



Modern Slavery Statement

For the 2025 Financial Year

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Context

This document comprises the Modern Slavery Statement ('Statement') of REI Super ABN 76 641 658 449. The statement is made in pursuant to the Modern Slavery Act 2018 (Act).

Listed below are the mandatory criteria to address the Modern Slavery Statement.

Mandatory criteria		Page number
1	Identify the reporting entity.	This page
2	Describe the structure, operations and supply chains of the reporting entity.	Page 4
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that it owns or controls.	Page 5
4	Describe the actions taken by the reporting entity and any entities that it owns or controls, to assess and address those risks, including due diligence and remediation processes.	Page 6
5	Describe how the reporting entity assesses the effectiveness of those actions.	Page 7
6	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Page 7
7	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 7

Structure, operations and supply chains

REI Super serves the real estate industry and operates as a public offer fund. It has around 23,000 members and manages assets totalling approximately \$2.3 billion. It provides three main products, accumulation, transition to retirement, pension and it also provides personal financial advice service to its members.

REI Super is structured as a trust and managed by a board of trustees, REI Superannuation Fund Pty Ltd ABN 68 056 044 770, AFSL 240569. The Fund Trustee is responsible for ensuring that the Fund operates as a complying and regulated superannuation fund in accordance with the Superannuation Industry (Supervision) Act 1993. It also ensures that the Fund operates in accordance with its Trust Deed and all relevant laws and regulations. References in this Statement to "REI Super", "We" or "Our" refer to both the Fund and the Fund Trustee.

Our internal operations consist of five business units: CEO Office, Governance Risk & Compliance, Investment Strategy & Operations, Member Services, and Marketing & Growth. We employ around 30 staff, with its headquarters located in Melbourne. Although most employees are based in Melbourne, several staff members work remotely from other states across Australia.

Our supply chain includes the provision of good and services including but not limited to fund administrator, asset consultant, fund managers, custodian, insurer, IT companies, professional services firms, facilities/premises, logistics, industry organisations, and HR services.

REI Super Board has established the following committees:

- Membership & Business Development
- Finance Audit & Compliance
- Insurance Claims
- Governance Remuneration & Nomination
- Investment
- Risk

The following outlines the Governance, Risk and Compliance (GRC) framework applied to modern slavery.

REI Super Anti Modern Slavery Governance Framework
REI Super Board (Board)
Ultimate responsibility for oversight of compliance with modern slavery regulations.
Risk Committee
Oversight of the inclusion of modern slavery considerations into REI Super's approach to risk management and managing risk of modern slavery practices in the supply chain.
Group Executives
Responsible for promoting a culture of best practice and continuous improvement as well as the development and oversight of strategy and operational initiatives that lead to any identification of modern slavery in REI Super's internal operations and supply chains.
Responsible for remediation of incidents of modern slavery that occur. The Group Executives meet weekly.
Group Executive - Governance Risk & Compliance
Responsible for developing and implementing REI Super's approach for identifying and managing risk of modern slavery practices in our internal operations and supply chains.
Responsible for receiving, investigating, and leading the resolution of grievances relating to modern slavery in REI Super's internal operations and supply chain (including anonymous disclosures made under the Fund's Whistleblower Policy).
Group Executive - Governance Risk & Compliance reports to the Chief Executive Officer (CEO) and separately to Risk Committee Chair. Group Executive - Governance Risk & Compliance also attends board delegated committee meetings.

The key areas of focus of our GRC modern slavery framework include:

- Leadership & culture
- Legal & compliance
- Supply chain engagement
- Knowledge & capability
- Incident management
- Monitoring & reporting

Key activities consistent with this GRC modern slavery framework are covered in the Actions taken to address and manage risks of modern slavery practices section on page 6.

Identifying risk of modern slavery practices in operations and supply chains

The Act Guidance for Reporting Entities defines "modern slavery" as including the following eight types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services, and
- the worst forms of child labour

Identifying risk of modern slavery practices involves examining how REI Super may potentially cause, contribute to, or be directly linked to such practices through its internal operations and supply chains.

Within the Trustee Office, there is a recognised risk of inadvertently causing modern slavery. Given the location of the Fund Trustee Office is in Australia and the professional background of its employees, the risk of we may potentially cause modern slavery practices is considered to be low. This aligns with data from the Global Salary Index¹.

We also acknowledge the potential to contribute to modern slavery through our processes for appointing service providers and selecting goods suppliers. We may potentially have direct linked to modern slavery in supply chain due to the below factors:

- Use of low-skilled, contract, and/or migrant labour
- Subcontracting and use of third-party labour hire agencies
- Procurement of materials
- Supplier operations in countries with weak or opaque commitments to human rights

In FY2025, modern slavery risk identification within the supply chain encompassed established service provider inventories and Tier² suppliers with annual spending exceeding a set threshold. The following risk categories are areas of focus when evaluating the modern slavery risk for each supplier in scope:

- Country or region where the supplier operates

¹ [Modern slavery in Australia | Walk Free](#)

² Tier 1 suppliers are suppliers that have a direct relationship with the reporting entity, without any intermediaries.

- Industry or sector in which the supplier operates
- Product or service that the supplier provides
- The supplier itself

The risk of modern slavery practices is considered to be higher within our supply chain compared to the Trustee Office's internal operations. However, our service providers and suppliers are predominantly based in Australia and typically operate in lower risk industries such as financial and professional services. Furthermore, our legal agreements with major suppliers prohibit subcontracting activities offshore without our prior knowledge and consent.

Actions to assess and address those risks, including due diligence and remediation processes

Utilising the GRC framework applied to modern slavery, we undertook the following key activities in FY2025.

Governance

We continued to review our policies and frameworks on periodic basis. These reviews were overseen by respective committees and the Board, both of which ensure that the reviews capture any amendments required to maintain the effectiveness of the relevant policies and frameworks.

Employee Safety and Knowledge

We maintained high standards for human rights in our workplace to ensure we minimise the likelihood of modern slavery. Key activities to uphold human rights in our workplace include:

- Verified employees' work eligibility in Australia and ensure adherence to the Code of Conduct to foster a safe, healthy, and inclusive workplace.
- Discussed modern slavery as part of employee onboarding and training, including whistleblower policy and protection, providing awareness/insights and process how to report any issues or concerns.
- Provision of leave entitlements and other benefits enabling employees to enjoy the right to family, recreation and work-life balance.

Supplier chain engagement

We expect our key suppliers, including our administrator, custodian, insurer and asset manager to assess their risk of modern slavery practices and conduct due diligence that considers the risk management in their internal operations and supply chains, and report any incidents. This includes providing detailed statements in respect of these activities. During the FY2025 no supplier has reported any incidents of modern slavery.

Risk assessment

We conducted a risk assessment and mapping of our suppliers, identifying a few service providers operating in higher risk countries such as India³ and the Philippines⁴. These are professional services firms with operations focused on highly skilled office based work. The sector is typically composed of well educated professionals working in office settings.

Incident reporting and remediation

We continued to encourage prompt and transparent reporting of modern slavery related concerns across both our internal operations and supply chain. This commitment supports our broader efforts to identify

³ [Modern slavery in India | Walk Free](#)

⁴ [Modern slavery in The Philippines | Walk Free](#)

and address potential risks effectively. Key activities that helped us understand the effectiveness of our reporting and remediation processes include:

- Incidents raised and investigated through internal reporting
- Analysis of reports against risk management
- Annual review of breach and incident processes

The risks of modern slavery practices within our internal operations and supply chains have been identified and assessed. Overall, these risks are currently considered low, and they are continuously monitored through mitigation measures.

Assessment of actions effectiveness

Effectiveness of actions being taken to address modern slavery risks is assessed through monitoring of outcomes and any modern slavery incidents reported. These are captured via our GRC system with escalation or follow up as required. In FY2025, there has been no modern slavery incidents reported.

Process of consultation with any entities owned or controlled

The reporting entity, REI Super, and its trustee, REI Superannuation Fund Pty Ltd, do not own or control other entities. In preparing this statement, all Group Executives were consulted, and the board of trustees reviewed and approved this Statement.

Grievances and remediation

Any concerns regarding risks of modern slavery practices in our internal operations and supply chains, can be reported anonymously as described in our Whistleblower Policy available at <https://reisuper.com.au/about-us/governance/whistleblower>.

Other relevant information

In FY2026, we aim to review our modern slavery risk management practices to ensure they comply with any upcoming updates to the Modern Slavery Act.

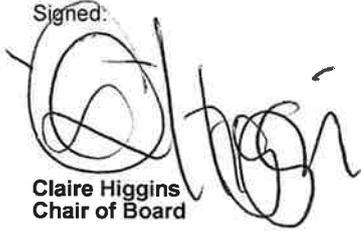
Our commitment to human rights is supported by a number of internal policies. These include:

- Risk Management Framework
- Investment Governance Framework
- Conflicts Management Framework
- Environmental, Social and Governance Policy
- Code of Conduct
- Whistleblower Policy
- Fraud & Corruption Policy
- Service Provider Management Policy
- Privacy Policy
- Inquiries & Complaints Procedures
- Anti-Money Laundering/Counter-Terrorism Financing Program

Approval

The Board of REI Superannuation Fund Pty Ltd as trustee of REI Super has approved this Statement.
This Statement will be updated annually.

Signed:

A handwritten signature in black ink, appearing to read 'Claire Higgins', written over a circular stamp or seal.

Claire Higgins
Chair of Board

Dated: 4 Dec 2025