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# Modern Slavery Statement

For Financial Year ending  
30 June 2021

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“At Perpetual, we are committed to taking action to address and mitigate modern slavery across our business. We know there is more work to do, and our focus on continuous improvement recognises that we will continue to develop our approach in addressing this important issue.”

**Rob Adams**

Chief Executive Officer and Managing Director

## Our Reporting Suite

Perpetual presents its 2021 annual reporting suite for the year ended 30 June 2021.



Our reporting suite is available online:  
[perpetual.com.au/reporting-suite](https://perpetual.com.au/reporting-suite)



Annual Report



Corporate Governance Statement



Modern Slavery Statement



Sustainability Report

# A message from our CEO

“As a trustee company supporting our clients for 135 years, our commitment has always been to earn trust through every action.”



As a trustee company supporting our clients for 135 years, our commitment has always been to earn trust through every action, every day and we continue to seek to build a sustainable future for our clients, our people and the communities we support.

We have been an early proponent of placing a strong focus on environmental, social and governance (ESG) factors in how we invest money on behalf of our clients. We set up our first Ethical SRI Fund in 2002 and have been signatories to the UN supported Principles for Responsible Investment since 2009. Since then, we have further developed our capabilities introducing a broader range of products that support our clients to contribute to a more sustainable future.

There is no more serious a social issue than modern slavery. In that context, I am proud to present Perpetual's second Modern Slavery Statement. This sets out the steps we are taking to identify and manage the specific risks of modern slavery in our operations and supply chain.

This is particularly important during the COVID-19 pandemic where, demand in certain sectors has increased, placing substantial pressure on suppliers and workers. Many industries have been forced to close, jeopardising the livelihood of communities around the world and placing people in increasingly vulnerable situations. It is clear that COVID-19 has intensified the modern slavery risks for people in vulnerable situations.<sup>1</sup>

Business accountability and transparency is important to maintain trust and to demonstrate progress on this important issue. We believe that the business and investment community can, and should, play a strong role in driving change and protecting the most vulnerable.

Over the past year, Perpetual has continued our ongoing work to identify, assess and address the risks of modern slavery relating to our business. We have established key protocols for reporting modern slavery incidents or concerns, conducted deeper due diligence with high risk investee companies and suppliers and we have developed a learning module on modern slavery, which we are rolling out to all our people.

Perpetual has strong governance in place to manage modern slavery, with a dedicated Working Group that has representation from across our divisions, and oversight and guidance provided by our Executive Committee. A new role of Sustainability and Modern Slavery Manager has also been appointed this year to drive forward our agenda on this important issue. I am pleased to have additional capability and expertise on this subject to work with different teams in our business and to advance our thinking on modern slavery and human rights.

At Perpetual, we are committed to taking action to address and mitigate modern slavery across our business. We know there is more work to do, and our focus on continuous improvement recognises that we will continue to develop our approach in addressing this important issue. I look forward to sharing our progress with you.

**Rob Adams**  
Chief Executive Officer and Managing Director

<sup>1</sup> Obokata, Tomoya, United Nations, 2020. [Impact of the coronavirus disease pandemic on contemporary forms of slavery and slavery-like practices.](#)

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# Reporting entities

This statement is submitted as a joint statement under section 14 of the *Modern Slavery Act 2018 (Cth)*, made on behalf of the following reporting entities in the Perpetual Group:

- Perpetual Limited ACN 000 431 827 and its controlled entities<sup>2</sup> (Perpetual Group);
- Perpetual Investment Management Limited ACN 000 866 535 (PIML); and
- Perpetual Trustee Company Limited ACN 000 001 007 (PTCo).

The term 'Perpetual' as used in this statement, refers collectively to Perpetual Group, PIML and PTCo.

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# Consultation

During FY21, we consulted across each of the reporting entities, which met the requirements for reporting under the *Modern Slavery Act 2018 (Cth)*. This included Perpetual Group, Perpetual Investment Management Limited and Perpetual Trustee Company Limited.

Engagement took place through our Modern Slavery Working Group, which included members across the following divisions: Perpetual Asset Management International (PAMI), Perpetual Asset Management Australia (PAMA), Perpetual Private (PP), Perpetual Corporate Trust (PCT), Legal, Audit, Risk, Company Secretariat and Compliance, Perpetual Client Solutions and Perpetual Group Services. These divisions operate across our controlled entities. Information was gathered from our controlled entities via the Modern Slavery Working Group for the statement. This Working Group meets on a quarterly basis, or more regularly if needed. In addition to the Working Group, a range of stakeholders from across all divisions were consulted on a regular basis and provided input for this statement.

This statement was developed in consultation with our Executive Committee.

The Board of Directors of each Reporting Entity have reviewed and approved this statement in December 2021.

<sup>2</sup> Refer to Appendix 1 for full list of controlled entities.

# Our structure, operations and supply chain

## Our structure

### Our vision

To be the most trusted in financial services

### Our purpose

Enduring prosperity

### Our business

Perpetual is a global ASX-listed financial services company, which has been serving clients since 1886. Our global client base includes institutions, not-for-profit organisations, Native Title trusts, small businesses, financial advisers, individuals and families.

Across our four divisions – PAMI, PAMA, PP and PCT – we protect and grow our clients' wealth, knowing that by doing so we can make a difference in their lives.

### Our strategic imperatives



#### Client first

Delivering exceptional products and outstanding service



#### Future fit

A scalable business platform that empowers our people to deliver high performance



#### New horizons

Adding new capabilities and building a global footprint

### Our sustainability focus

At Perpetual, sustainability is about creating enduring prosperity for our clients, people, communities, and the environment. This means delivering excellent service, providing a safe and inclusive workplace, helping increase investment in communities and reducing our impact on the environment. Our approach is built on strong foundations of good corporate governance, prudent risk management and a longstanding commitment to ESG principles.

### Our people and locations



For more information about our business, see our Operating and Financial Review at: [perpetual.com.au/ofr](https://perpetual.com.au/ofr)

The registered office of each reporting entity is 123 Pitt Street, Sydney and we have additional offices in Melbourne, Brisbane, Adelaide, Perth, Canberra, Singapore, Boston, San Francisco, Portland and Dallas as well as a presence in London, Edinburgh and Hong Kong. At the end of the reporting period, in FY21, we had 1,166 full time equivalent employees. We also opened registered offices in Amsterdam and Chicago although these were opened after the reporting period for this statement.



## Our structure, operations and supply chain (continued)

### Our operations<sup>3</sup>

#### The services we provide

The services provided by Perpetual, are performed by four divisions:

#### Perpetual Asset Management International

A growing international division with a presence in the US, the UK, Europe and Hong Kong. The division includes the operations of Trillium Asset Management (Trillium), a pioneering US ESG investment specialist, as well as Barrow Hanley Global Investors (Barrow Hanley), a diversified investment management firm that offers value-focused investment strategies spanning global equities, US equities and US fixed income.

#### Perpetual Asset Management Australia

A highly regarded investment manager, with a strong heritage in managing retail and institutional client assets, offering a broad range of investment, superannuation and retirement savings products. We manage investments across a range of asset classes, including Australian and global equities, cash and fixed income and multi asset strategies. We offer an increasing range of ESG strategies and service a diverse range of client types, from large institutional investors through to individual retail investors.

The investment management activities of Perpetual Asset Management Australia are provided by PIML. PIML is also the responsible entity of a number of registered and unregistered managed investment schemes and the Perpetual Group also offers a number of superannuation and retirement solutions funds through its registrable superannuation entity, Perpetual Superannuation Limited.

#### Perpetual Private

An advisory services business focused on the comprehensive needs of high-net-worth individuals, families and non-profit organisations. PP aims to lead the market in advisory and professional services in its chosen segments. A key part of PP is its philanthropic business and Perpetual is one of Australia's largest managers of philanthropic funds. PP is a leading manager of Native Title trusts, providing long-term support for First Nations communities. PP also provides accounting and business advice to small businesses, through a wholly owned subsidiary, Fordham Business Advisors Pty Ltd.

#### Perpetual Corporate Trust

Provides a broad range of fiduciary and agency products to the debt capital markets and managed funds industries in Australia and Singapore. Perpetual Digital, PCT's innovation company, encompasses data services, industry roundtables and our Perpetual Intelligence digital platform, which supports the banking and financial services industry. In providing these services, Perpetual Corporate Trust utilises a number of entities in the Perpetual Group, including PTCO, Perpetual Corporate Trust Limited, Perpetual Trust Services Limited, The Trust Company (RE Services) Limited, The Trust Company Limited, The Trust Company (Australia) Limited and Perpetual (Asia) Limited. In addition, the data and analytics services within Perpetual Digital are provided by a few entities in the Perpetual Group including Perpetual Nominees Limited, Perpetual Digital Pty Limited Perpetual Roundtables Pty Limited and Laminar Capital.

These divisions are supported by:

#### Perpetual Group Support Services

Perpetual Group Services includes the following divisions:

#### Perpetual Client Solutions

Consisting of teams providing technology, vendor and procurement management, operations (including payment, custody, accounting, tax), project delivery and product development and management to the Perpetual Group.

#### Perpetual Group Services

Consisting of the finance and the financial reporting team, investor relations and communications, marketing and building services.

#### Legal, Audit, Risk, Company Secretariat and Compliance

Provides risk, compliance, internal audit and company secretariat support as well as legal advice to the Perpetual Group.

#### People and Culture

Includes the talent acquisition team, employee benefits and overall responsibility for Perpetual's human resources function, such as providing the framework for Perpetual's remuneration and performance and reward programs.

<sup>3</sup> The term 'operations' is used to refer to the activities undertaken to pursue our business objectives and strategy, as per the description of activities provided by the [Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities](#).

**Our structure, operations and supply chain** (continued)

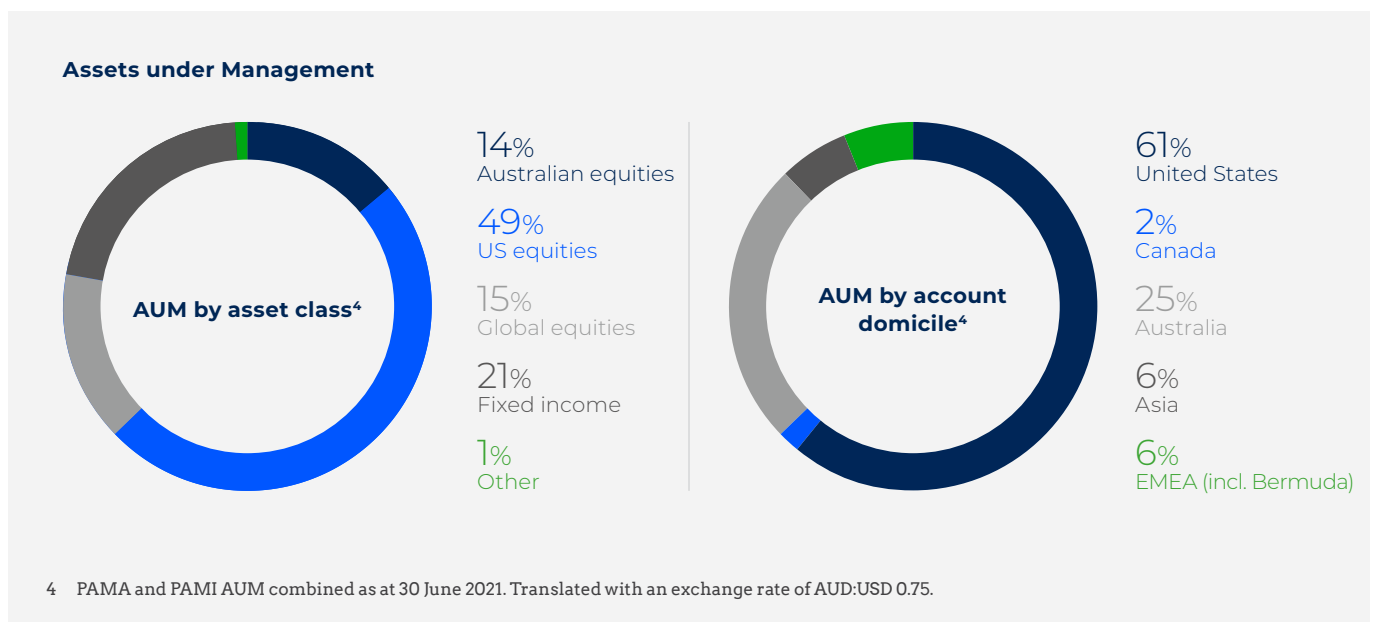
**Modern slavery governance structure**



**Our investments**

Our total Assets under Management (AUM) within our asset management businesses PAMA and PAMI was a total of A\$98.3 billion<sup>4</sup> in AUM across multiple asset classes, channels and regions. Our major asset classes were across the US, global and Australian equities, followed by fixed income assets. Our account domicile was concentrated in the United States and Australia.

**\$98.3<sub>b</sub>**  
Total AUM



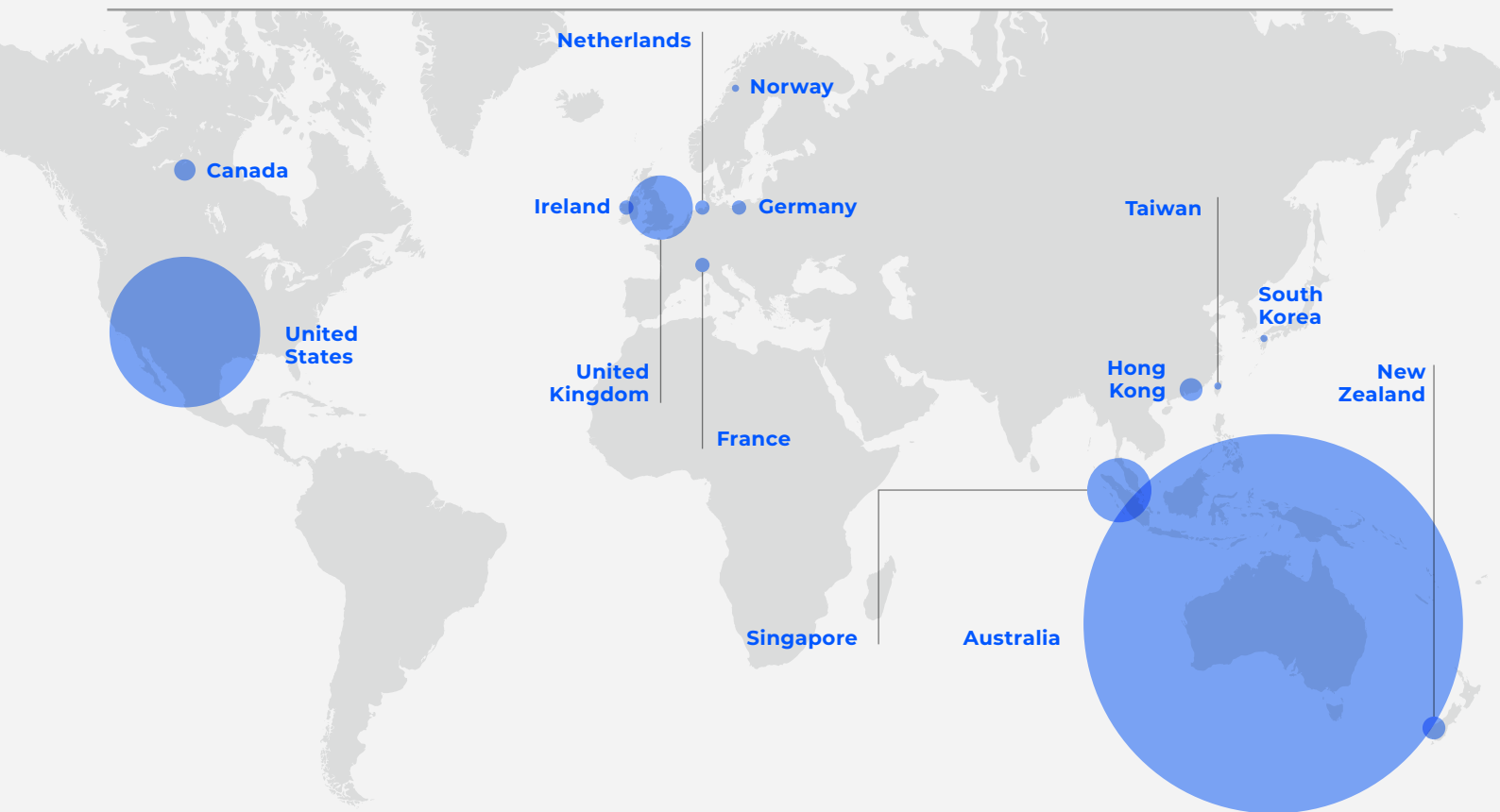
## Our structure, operations and supply chain (continued)

### Our supply chain

Perpetual sources 73% of the products and services we use from suppliers in Australia. Acquiring Trillium and Barrow Hanley in 2020 has seen our supply chain expand. Our Singapore office continue to procure goods and services in the Singapore region.

●●● Bubble size indicative of number of suppliers/service providers

### Mapping our global supply chain<sup>5</sup>



### Our major procurement categories of goods and services include:

- 
**Asset management services**  
 Particularly external investment managers, custody banks, brokerage and research houses
- 
**Real estate management**  
 Such as property managers and banks
- 
**Commercial cleaning and equipment repair services**
- 
**Professional services**  
 Such as lawyers, accountants and auditors
- 
**Technology and technology support**
- 
**Registry services**
- 
**Hotels, restaurants and leisure**

<sup>5</sup> This supply chain map represents our goods and services suppliers that are above a materiality spend threshold of \$10,000.



# Our modern slavery risks

## We understand that modern slavery risk can occur in our Australian and global investments and supply chains.

We consider risk assessment a critical process to identifying the inherent risk of modern slavery across our business. This risk assessment is used to categorise our suppliers and investments into industries. Taking a risk-based approach, we implement additional due diligence for higher risk industries to reduce the residual risk of modern slavery.

### How we define modern slavery risks

Modern Slavery is an umbrella term. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, abuse of power, or deception. It is largely invisible, in part because it disproportionately affects the most marginalised.<sup>6</sup> We recognise that COVID-19 has exacerbated modern slavery risks for people in vulnerable situations.<sup>7</sup>

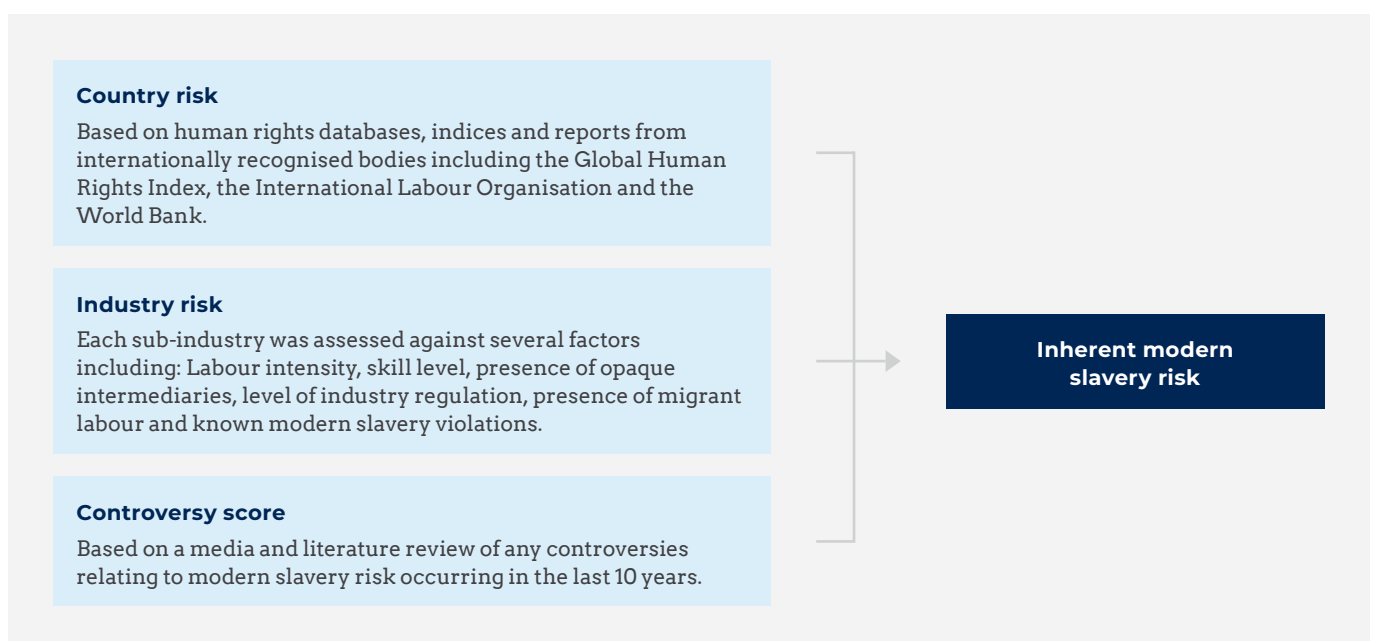
Modern slavery includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.<sup>8</sup> When we think about the risk of modern slavery practices, we mean the potential for our entity to cause, contribute to, or be directly linked to modern slavery through our operation or supply chain.

### Our risk assessment methodology

In FY21, we collected information on our supply chain and about our investee relationships from PAMI (including Trillium and Barrow Hanley), PAMA, PP, PCT and Group Support Services. Specifically, we investigated the suppliers and investee companies that we have a direct relationship with. Suppliers and investee companies were then assessed for inherent modern slavery risks by a professional consulting firm, using their risk assessment tool. An inherent risk score was determined for each supplier or investee company. Inherent risk is the level of risk before any actions are taken to manage the risk's impact or likelihood.

<sup>6</sup>This data excluded information about our people, as Perpetual employees are primarily professional staff employed directly in Australian and US offices, which is considered a low risk of modern slavery.

The FY21 risk assessment results have been analysed by our Sustainability and Modern Slavery Manager. Secondary research using industry and academic resources, has been conducted to build on the data driven insights provided by the risk assessment tool.



<sup>6</sup> The Minderoo Foundation, 2018. [The Global Slavery Index 2018](#), 7,2.

<sup>7</sup> Obokata, Tomoya, United Nations, 2020. [Impact of the coronavirus disease pandemic on contemporary forms of slavery and slavery-like practices](#).

<sup>8</sup> As defined in the Australian *Modern Slavery Act 2018* (Cth).

## Our modern slavery risks (continued)

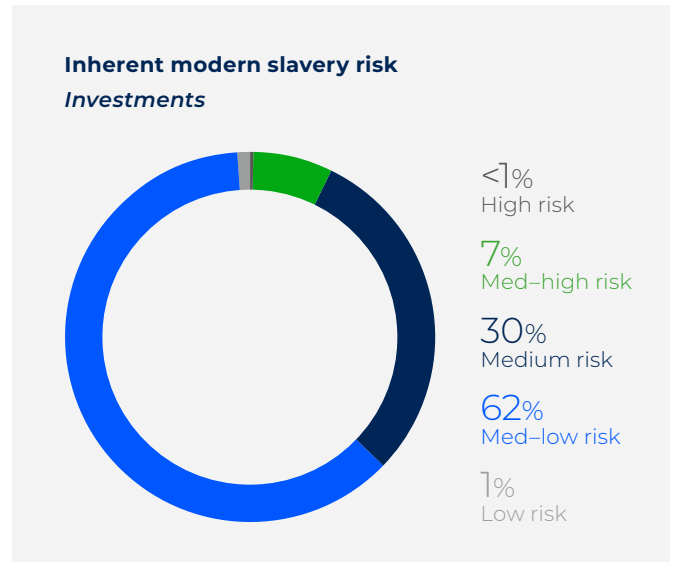
### Risk assessment results






#### Investments<sup>9</sup>

Our investment footprint is local and global, including many multi-national companies. Our risk assessment included each of our asset management businesses.<sup>10</sup>

Our FY21 risk assessment revealed that of our assessed investment portfolio, seven investments pose a high inherent modern slavery risk, and 139 investments pose a medium-high inherent modern slavery risk.

Our investments that have a high (0.36% of our portfolio) and medium-high (7% of our portfolio) inherent risk profile are in industries or geographies that are considered higher risk. In these industries, the most relevant types of modern slavery risks for our investments are forced and child labour. The below table summarises the risks of industries that our investee companies categorised as high and medium-high risk are in. Our approach to due diligence and assessment for investments is informed by these risk profiles.



Industries	Inherent risk profile
 <b>Food and beverage manufacturing and agriculture industries</b>	The COVID-19 pandemic has resulted in pressure to increase production and has caused the restructure of supply chains. This has exacerbated already existing risks of modern slavery, which is high in manufacturing and agriculture industries.
 <b>Cement manufacturing</b>	The raw materials for the construction industry, specifically cement manufacturing, have a high risk of modern slavery.
 <b>Garment, textiles, footwear, jewellery and accessories industries</b>	Labour exploitation is common in these industries, which rely on global supply chains that often intersect with countries that have a higher risk of modern slavery.
 <b>Electronics, technology and automotive industries</b>	Modern slavery risk exists in the raw materials supply chains of vehicles and electronic goods. This is due to the prevalence of conflict minerals in the production processes.
 <b>Medical protective wear manufacturing</b>	The sudden surge in demand for medical protective wear due to the COVID-19 pandemic has heightened the occurrence of labour violations in supply chains.

<sup>9</sup> For our business, our operations mainly consist of the people we employ and our financial investments. The operational focus for our risk assessment excluded information about our people, as Perpetual employees are primarily professional staff employed directly in Australian and US offices, which is considered a low risk of modern slavery. As such, our operational focus for our risk assessment was on our financial investments.

<sup>10</sup> Due to challenges around data availability and classification some asset classes were not included from Trillium and Barrow Hanley in the FY21 risk assessment. We will seek to include these asset classes in future risk assessments.

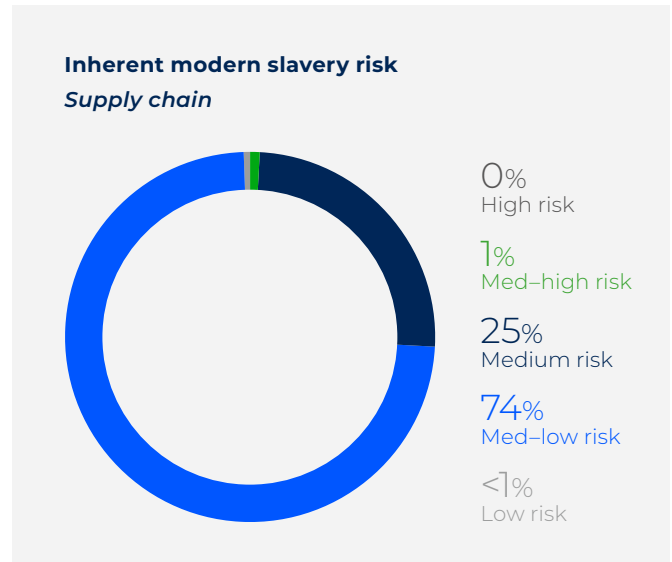
## Our modern slavery risks (continued)



### Supply chain

Our FY21 risk assessment did not identify any high risk suppliers, however, it did identify 12 medium-high (1% of our supply chain) inherent risk suppliers from the Asia region, that supply goods and services for our international offices.

Our suppliers that have a medium-high (1% of our suppliers) inherent risk profile are from industries or geographies that are considered higher risk. In these industries or geographies, the most relevant types of modern slavery risks for our supply chain are forced and child labour.

Perpetual sources 73% of the products and services we use from suppliers in Australia. In comparison to globally sourced goods and services the inherent risk of modern slavery in Australia is low, however industry research has identified several industries that are considered more prone to modern slavery risk. As several of our medium risk suppliers are from these industries this has been included in our industry assessment below. The table below summarises the risks of industries that our suppliers categorised as medium-high risk are in. Our approach to due diligence and assessment for investments is informed by these risk profiles.



Industries	Inherent risk profile
 <b>Building services – cleaning, security and maintenance</b>	These services rely heavily on migrant workers and employment arrangements are often casual, involve sub-contracting or the use of labour hire firms. These characteristics increase the risk of modern slavery in building services.
 <b>Catering and hospitality services</b>	Casual employment and the use of migrant workers on temporary visas, elevate the risk of modern slavery in catering and hospitality services.
 <b>Corporate merchandise</b>	The Global Slavery Index has ranked garments as one of the top five imported products in Australia that is at risk of modern slavery. <sup>11</sup>
 <b>IT and electronics</b>	Ranked in the top five imported products in Australia that is at risk of modern slavery by the Global Slavery Index. <sup>11</sup>
 <b>Business services in Asia</b>	Migrant workers who are employed to provide business services are vulnerable to exploitation. Additionally, Human Rights Watch have growing concern about China’s human rights violations in 2020, particularly in Hong Kong. <sup>12</sup>

11 The Minderoo Foundation, 2018. [The Global Slavery Index 2018](#), 121.

12 Human Rights Watch, 2021. [World Report: China](#).

# Our actions to address modern slavery risks

In FY21 our approach to addressing modern slavery has been underpinned by the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles).

Specifically, we have drawn on the operational principles as outlined by the UN Guiding Principles to inform how we address the risk of modern slavery through our commitments and policies, due diligence and remediation.

## Our commitments and policies

Several policies, frameworks and strategies are used to address modern slavery risks across Perpetual. These are listed in the table below.

<b>Modern Slavery Framework</b>	This framework sets out the programs, processes and tools we have in place to ensure compliance with the Modern Slavery Act. It also provides a consistent framework to effectively manage our ongoing modern slavery risks and enhances our management team's awareness and understanding of modern slavery risks.
<b>Whistle-blower Policy</b>	In FY21, our Whistle-blower Policy was amended to formally recognise that modern slavery breaches form part of conduct that can be reportable under this policy.
<b>Supplier Code of Conduct</b>	Our Supplier Code of Conduct sets out minimum standards on human rights and modern slavery that we expect suppliers to comply with.
<b>Responsible Investment Policies</b>	Trillium, Barrow Hanley, PAMA and PP have dedicated policies that set out how consideration of ESG factors is integrated into our investment analysis and decision-making process, including consideration of social issues such as modern slavery.
<b>Developing our Sustainability Strategy</b>	In FY21, we commenced a program of work to develop a Sustainability Strategy for Perpetual, which will set out the commitments we will make to areas that are important to our business and stakeholders and where we can have the most impact. This will help to drive the decisions we make as we deepen the integration of sustainability-related issues into our business, including modern slavery.

## Our actions to address modern slavery risks (continued)

### Due diligence and training

#### Our approach to governance

During FY21, our approach to governance was driven by the objective of driving stakeholder engagement on modern slavery across a variety of levels within the business. Our senior management team provided critical oversight of our activities and our Working Group allowed us to collaborate across the business. The Sustainability team within the Corporate Affairs and Investor Relations function has driven the agenda for modern slavery and regularly works with Senior Management, driving 'bottom-up' governance in addition to the 'top-down' governance structure.

#### Risk assessment

Our annual risk assessment was conducted to assess our inherent modern slavery risks. This assessment applied a professional consulting firm's risk assessment tool to our supplier and investment relationships across Perpetual. In FY21, we included Trillium and Barrow Hanley, significantly expanding the scope of risk assessment.

#### Grievance mechanism

In FY21, our Whistle-blower Policy was updated to include modern slavery as a form of reportable misconduct. Through this mechanism, employees can report any concerns to a Whistle-blower Protection Officer within Perpetual or anonymously through our third-party whistle-blower hotline.

#### Training

We recognise the need for capacity building across Perpetual to increase knowledge and to highlight the importance of addressing modern slavery. In FY21, we developed a training module for all Australian-based employees to undertake. Our training program is currently being implemented across our organisation.

### Investments due diligence

#### ESG integration

Across our businesses, ESG factors are integrated into our investment analysis and decision-making process. Our approaches are outlined in our Responsible Investment Policies.

#### High risk investee companies

Additional due diligence was conducted on the investee companies with a high inherent risk assessment. This included engagement with the Head of Responsible Investments at PAMA and, where we have significant leverage, engagement with the investee companies. We have also conducted additional desktop due diligence of investee companies that have a medium-high inherent risk rating where we have a material ownership share. Additionally, the PAMA team engage with investee companies if any human rights and modern slavery issues are identified as part of the ESG integration process above and we can influence how this issue will be addressed in the future. The case study on fast fashion retailer Boohoo is an example of engagement in FY21.

#### Supply chain due diligence

##### Questionnaires

We incorporate standard modern slavery and human rights questions as part of engagement with suppliers who provide critical services.

##### Contract clauses

We continue to include contractual provisions focused on modern slavery within contractual terms with new suppliers to ensure our suppliers understand we require them to assess and manage modern slavery risk in their business.

##### Code of conduct

All suppliers assessed as 'medium-high' or 'high' risk and suppliers who provide critical services are required to accept this Supplier Code of Conduct as part of their contractual obligations.

##### High risk suppliers

In FY21, additional due diligence was conducted on the suppliers with a high inherent risk assessment. These suppliers were required to complete a self-assessment questionnaire to determine that they had adequate controls in place to manage modern slavery related risks.



#### Case study: Supplier onboarding process

We have designed a decision tree which has been embedded into our Vendor Management Framework. This tool allows our commercial and compliance teams to conduct a modern slavery risk assessment for new and existing suppliers when they are being onboarded or when we are renewing a contract. In this assessment, suppliers are risk rated based on country and industry. Using a risk-based approach, suppliers that return a higher risk rating must go through additional due diligence which includes adhering to our code of conduct, providing a copy of their Modern Slavery Statement or completing a self-assessment questionnaire.



#### Case study: Engagement PAMA – Equities Investment Team

Boohoo is a leading UK online fast fashion retailer. In July 2020, Boohoo's stock price fell significantly following media reports of exploitative work practices in Boohoo's UK supply chain. Poor working conditions, which include exploitative practices, can lead to modern slavery. We subsequently conducted extensive due diligence on the issue including discussions with UK garment industry independent experts and the company, to ascertain whether the issue was systemic. We gained comfort that the issues were isolated and that the company had a robust approach to managing this risk going forward.

**Our actions to address modern slavery risks** (continued)

**Remediation**

**In FY21, we finalised our remediation process for modern slavery.**

The purpose of remediation is to ensure Perpetual takes reasonable steps to:



- Address the underlying root causes driving the modern slavery if possible;
- Prevent the modern slavery impact from re-occurring by collaborating, supporting remediation and monitoring the implementation of remedial measures taken by another party; and
- Ensure compliance with national and international labour and human rights standards.

Our remediation process has been approved by the Perpetual Board and has been captured in our Modern Slavery Framework. The process details specific steps that we will take if Perpetual has ‘caused or contributed’ to modern slavery. Our approach to remediation is led by a set of guiding principles. This includes ensuring that our actions are in the best interest of the suspected victim or victims and responding in a way that is appropriate to the circumstances of the situation.

The principles also articulate that we will take steps to prevent further harm to achieve the best possible outcome for the victim or victims and consider whether there is any action that Perpetual can take that may address the underlying structural factors that have contributed to the exploitation. Our framework, including the remediation process, has been published on our intranet and communicated with our employees directly by our Chief Risk Officer.

**Engagement**

We recognise that collaboration is key to addressing modern slavery. During FY21, we took part in several initiatives that support companies in addressing human rights issues, including modern slavery.

Initiative	What they stand for	Activities
<p><b>Responsible Investment Association of Australasia (RIAA) Human Rights Working Group</b></p> 	<p>RIAA champions responsible investing and a sustainable financial system in Australia and New Zealand. RIAA is dedicated to ensuring capital is aligned with achieving a healthy society, environment and economy.</p>	<p>As part of our membership, we are involved in the RIAA Human Rights Working Group.</p>
<p><b>Principles for Responsible Investment (PRI)</b></p> <p>Signatory of:</p> 	<p>The PRI is the world’s leading proponent of responsible investment. It works to understand the investment implications of ESG factors, including human rights. PRI is an investor initiative in partnership with UNEP Finance and the UN Global Compact.</p>	<p>Our commitment to PRI acknowledges that, as a company and an industry, we must continue to improve our understanding of how ESG factors, including social factors such as modern slavery, impact investment returns for individual assets and across the economy.</p>



# Measuring the effectiveness of our actions

## We aim to continuously improve our approach to addressing modern slavery.

This commitment requires us to constantly reflect on our progress and to acknowledge what we can do better. Here, we share our FY21 actions, some critical reflections on our FY21 progress and, we outline key objectives and effectiveness measures for FY22 so that we can measure our progress going forward.

### Key actions in FY21

- 1. Published our first Modern Slavery Statement** and embedded our Modern Slavery Framework
- 2. Strengthened our policies and established key protocols** for reporting modern slavery incidents or concerns
- 3. Conducted deeper due diligence** with high risk investee companies and suppliers
- 4. Developed a learning module on modern slavery** which we are rolling out to our people
- 5. Included our newly acquired businesses** Trillium and Barrow Hanley in our inherent risk assessment
- 6. Established key objectives and effectiveness measures** so that we can measure our progress going forward

### Lessons learnt from FY21

- As we continued to develop our policies and commitment, we recognised that we need to be able to measure outcomes of our actions. This resulted in the development of key objectives and effectiveness measures, which we will monitor going forward.
- During FY20, Perpetual acquired Trillium and Barrow Hanley, growing our global presence. We consulted with our teams in our new businesses regarding our modern slavery obligations and collected data about their supply chains and investments. However, due to challenges around data availability and classification some asset classes were not included in the FY21 risk assessment. We will seek to include these asset classes in future risk assessments.
- Taking a risk-based approach, we conducted increased due diligence on investments, which were identified as having a higher inherent risk of modern slavery. Within this group we are initially focussing on those investments where we have the greatest leverage to influence meaningful change.

These learnings have guided the development of actions for FY22, to further embed and improve our approach to addressing modern slavery.

### Actions for FY22

	Objectives	Effectiveness measures
<b>Strategy development</b>	Modern slavery incorporated into our new Sustainability Strategy.	Set commitments and actions for modern slavery in our Sustainability Strategy.
<b>Capacity building</b>	Build the capacity of our employees in relation to modern slavery including understanding, risk management and reporting concerns.	Percentage of employees having completed modern slavery training.
<b>Employee awareness</b>	Build the awareness of modern slavery across the organisation.	Percentage of employees engaging with our internal awareness campaign.
<b>Global engagement</b>	Foster a collaborative relationship with our globally acquired businesses.	Greater coverage for asset classes in our risk assessment.
<b>Risk management</b>	Continuous improvement of our risk management process.	Actions completed following the risk assessment.
<b>Investments</b>	Greater level of due diligence for higher risk investee companies.	Thematic research insights on higher risk investee companies compiled and presented internally.
<b>Supply chain</b>	Improve our visibility of our supply chain beyond tier 1 for priority high risk categories.	Action plan created for improving our due diligence.

# Appendix

## Appendix 1: Controlled entities

The following entities are controlled by Perpetual Limited and are covered in this statement.

### Entities

- Australian Trustees Limited
- Barrow, Hanley, Mewhinney & Strauss, LLC
- BHMS Investment GP, LLC
- BHMS Investment Holdings, LP
- Commonwealth Trustees Pty Ltd
- Fintuition Institute Pty Ltd
- Fintuition Pty Ltd
- Fordham Business Advisors Pty Ltd
- P.T. Limited
- Perpetrust Nominees Pty Ltd
- Perpetual (Asia Holdings) Pte. Ltd
- Perpetual (Asia) Limited
- Perpetual Acquisition Company Limited
- Perpetual Asset Management UK Limited
- Perpetual Assets Pty Ltd
- Perpetual Australia Pty Limited
- Perpetual Corporate Trust Limited
- Perpetual CT (Asia) Limited
- Perpetual Custodians Limited
- Perpetual Digital Holdings Pty Limited
- Perpetual Digital Pty Limited
- Perpetual Europe Company B.V.
- Perpetual Legal Services Pty Limited
- Perpetual Mortgage Services Pty Limited
- Perpetual Netherlands B.V.
- Perpetual Nominees Limited
- Perpetual Roundtables Pty Ltd
- Perpetual Services Pty Limited
- Perpetual Superannuation Limited
- Perpetual Tax and Accounting Pty Ltd
- Perpetual Trust Services Limited
- Perpetual Trustee Company (Canberra) Limited
- Perpetual Trustees Consolidated Limited
- Perpetual Trustees Queensland Limited
- Perpetual Trustees Victoria Limited
- Perpetual Trustees W.A. Ltd
- Perpetual US Holding Company, Inc.
- Perpetual US Services, LLC
- Perpetual US TDC, LLC
- Perpetual Wholesale Fiduciary Services Pty Limited
- Queensland Trustees Pty Ltd
- Skinner Macarounas Pty Ltd
- The Trust Company (Australia) Limited
- The Trust Company (Nominees) Limited
- The Trust Company (PTAL) Limited
- The Trust Company (RE Services) Limited
- The Trust Company (UTCCL) Limited
- The Trust Company Limited
- Trillium Asset Management Group, LLC
- Trillium Asset Management UK Limited
- Trillium Asset Management, LLC
- Trillium Impact GP, LLC

## Appendix (continued)

### Appendix 2: Australian Modern Slavery Act – mandatory reporting criteria

The following table describes the location of each mandatory reporting criteria within the FY21 Modern Slavery Statement.

Mandatory Reporting Criteria	Location in Modern Slavery Statement
Identify the reporting entity	Reporting Entities <a href="#">Page 4</a>
Describe the reporting entity's structure, operations and supply chains	Our Structure, Operations and Supply Chain <a href="#">Page 5</a>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Our Modern Slavery Risks <a href="#">Page 9</a>
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Our Actions to Address Modern Slavery Risks <a href="#">Page 12</a>
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring the Effectiveness of our Actions <a href="#">Page 15</a>
Describe the process of consultation and any entities the reporting entity owns or controls	Consultation <a href="#">Page 4</a>
Any other relevant information	Appendix <a href="#">Page 16</a>

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# Our offices



## NEW SOUTH WALES

Angel Place  
Level 18,  
123 Pitt Street  
Sydney NSW 2000

## VICTORIA

Level 28 and 29  
Rialto South Tower  
525 Collins Street  
Melbourne VIC 3000

## SINGAPORE

16 Collyer Quay #07-01  
Singapore 049318

## QUEENSLAND

Central Plaza 1  
Level 15,  
345 Queen Street  
Brisbane QLD 4000

## SOUTH AUSTRALIA

Level 11,  
101 Grenfell Street  
Adelaide SA 5000

## CHICAGO

155 N Wacker Drive,  
Suite 4250  
Chicago, IL 60606  
USA

## AUSTRALIAN CAPITAL TERRITORY

Level 9,  
Nishi Building  
2 Phillip Law Street  
Canberra ACT 2601

## WESTERN AUSTRALIA

Exchange Tower  
Level 29,  
2 The Esplanade  
Perth WA 6000

## AMSTERDAM

Apollolaan 151,  
1077AR Amsterdam  
Netherlands



## BOSTON

Two Financial Center  
60 South Street,  
Suite 1100  
Boston, MA 02111  
USA

## PORTLAND

721 NW  
Ninth Avenue,  
Suite 250  
Portland, OR 97209  
USA

## EDINBURGH

15 Queen Street  
Edinburgh EH2 1JE  
United Kingdom

## SAN FRANCISCO

160 Spear Street,  
Suite 250  
San Francisco, CA 94105  
USA

## LONDON

20 North  
Audley Street  
London W1K 6LX  
United Kingdom



## DALLAS

2200 Ross Avenue,  
31st floor  
Dallas, TX 75201  
USA

## HONG KONG

Unit 22, Level 10  
BOC Group Life  
Assurance Tower  
139 Des Voeux Road Central  
Central Hong Kong

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