



Committee Secretary
Joint Standing Committee on Foreign Affairs, Defence and Trade
PO Box 6021
Parliament House
Canberra ACT 2600

April 28th, 2017

To the Committee Secretary,

RE: ESTABLISHING A MODERN SLAVERY ACT IN AUSTRALIA

Profile

Christian Super (ABN: 66 628 776 348) is an industry superannuation fund with over 25,000 members and over \$1 billion in assets under management. As a long term investor of our members' retirement savings, we desire to see responsible and sustainable business practices amongst Australian and international companies. We are strongly committed to investing in accordance with the Christian values held by our members, and maximising our financial performance by encouraging companies to address material environmental, social and governance (ESG) risks in their practices.

Terms of Reference

Christian Super has already supported a submission by the PRI organisation into this Committee Inquiry (see attached), which speaks to most of the terms of reference. As such, this separate submission seeks to elaborate on certain points, as well as address separate points not raised in that submission.

PROVISIONS IN THE UNITED KINGDOM'S LEGISLATION WHICH HAVE PROVEN EFFECTIVE IN ADDRESSING MODERN SLAVERY, AND WHETHER SIMILAR OR IMPROVED MEASURES SHOULD BE INTRODUCED IN AUSTRALIA

As investors, Christian Super believes that the companies, to which we invest on behalf of our members, sit at the nexus point between society, governments, and the environment. As such, they play a key role in addressing complex social issues, such as modern slavery. We also believe that for companies, a sustainable supply chain is a more profitable supply chains. When workers are given the right to freedom of association, a living wage, safe working conditions, and are free from slavery and bondage, then supply chains are ultimately more resilient, generating sustainable returns for our beneficiaries.

Christian Super **supports disclosure requirements commensurate with the current level of disclosure requirements in Section 54** of the UK's *Modern's Slavery Act (2015)*. We believe that while global supply chains are still far from transparent, at this stage, it should be left to companies to decide how best to disclose, less overly prescriptive disclosure requirements results in a backlash



from the business community. As the global community better responds to the issue of modern slavery, then disclosure requirements should be revised. However at this stage, the response to modern slavery seems to still be very much in its infancy, and as such best practise disclosure is still being developed. We also **support the establishment of a central repository for such reporting.**

To ensure that Australian businesses are equipped to play their role in combatting modern slavery, we also support the **establishment of an Independent Anti-Slavery Commissioner.** Given modern slavery requires a whole-of-society response, from government agencies, through to businesses, and civil society, the importance of an independent, and appropriately resourced Independent Commissioner to objectively oversee and review such a mammoth task, cannot be overstated. While Australia has made good first steps, given the systemic, insidious, and longstanding nature of modern slavery in society, there is still much to be done. It is our view that an Independent Commissioner is required to spearhead the next step in Australia's response. As to the exact powers and resources given, we encourage the Australian Government to learn from the criticism of the UK experience over a year on, and engage appropriately.

WHETHER A MODERN SLAVERY ACT SHOULD BE INTRODUCED IN AUSTRALIA

Christian Super supports the establishment of a Modern Slavery Act in Australia.

Thank you for taking the time to consider our submission. We look forward to the outcome of the Inquiry.

Yours sincerely,

Tim Macready, Chief Investment Officer
Christian Super