

Modern Slavery Statement 2025

First Super | Modern Slavery Statement 2025

The Modern Slavery Act 2018 (Cth) reporting criteria

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Introduction

This Modern Slavery Statement is made in accordance with the Commonwealth's *Modern Slavery Act 2018* (Cth), **(the Act)**. First Super acknowledges its expanded obligations to report on modern slavery in its operations (including investment activities) and supply chains.

First Super recognises not only its responsibilities under the Act, but also its opportunity as steward of member's retirement savings to help transform industry practices and more effectively combat modern slavery in all its forms. First Super strives to work closely with our suppliers, fund managers and employees to enhance our knowledge of modern slavery risks across our operations and supply chains.

For the purposes of defining modern slavery, we refer to the Act itself, which describes situations where offenders "use coercion, threats or deception to exploit victims and undermine their freedom". It lists eight practices that can constitute modern slavery, including: human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.

This statement sets out First Super's actions to identify and address modern slavery risks arising from our operations. It further outlines the steps we have taken and how we maintain responsible and transparent supply chains across our organisation.

About First Super

The reporting entity First Super Pty Limited (ABN: 42 053 498 472) as the Trustee for First Super (ABN 56 286 625 181) (the Fund), is a public offer superannuation fund. The Trustee holds an RSE License from the Australian Prudential Regulation Authority which allows the Trustee to operate the Fund on behalf of its members.

First Super was founded in July 2008 following the merger of three industry super funds. As the industry fund for employees in the timber, pulp and paper, and furniture and joinery industries, our products and services are designed to meet the needs of these members, their employers and communities, as well as being suitable for our broader membership.

First Super is also one of the few funds in Australia which accepts transfers of KiwiSaver – New Zealand's voluntary, work-based retirement savings scheme.

This allows First Super members who have moved to Australia from New Zealand to couple their KiwiSaver with their Superannuation, benefit from compound interest and grow their retirement savings.

First Super offers members five investment options within its accumulation (including Transition to Retirement) and Retirement products.

First Super's shareholders include the Timber Trade Industrial Association (TTIA), Australian Cabinet and Furniture Association (ACFA), Australian Furniture Association (AFA), Australian Forest Products Association (AFPA) in trust for the AFPA Committee Tasmanian Forest Products Association (TFPA) and Timber, Furnishing & Textiles Union (TFTU) (ACN 117 909 127 Pty Ltd).

The Trustee for First Super owns 100% of Super Benefits Administration Pty Ltd (the Fund's administrator) as a private equity investment.

Summary of actions

We recognise that there will continue to be risks of modern slavery in our supply chains and operations given the linkage of our operations to the global economy.

Because the task of identifying risks in the supply chain may be overwhelming, the UN Guiding Principles suggest focusing on the areas of greatest risk, which means those which would cause the greatest harm to people, the greatest impact or where risks are large-scale (a significant number of people are affected). We will continue to follow these guiding principles and revise our assessment of these risks. At First Super, we are aware that forced labour and other forms of modern slavery are a devastating reality, but we are committed to playing our role in reducing these practices in Australia and overseas.

Actions we have taken

First Super has taken the following steps to mitigate modern slavery risks:

1. Collaborated with industry participants to further develop our method of risk assessment, raise awareness of modern slavery risks and strengthen due diligence in deeper supply chains
2. Included modern slavery clauses in our contracts with suppliers and investment managers.
3. Engaged closely with investment managers and suppliers to better understand our exposure to modern slavery.
4. Joined Investors Against Slavery and Trafficking Asia Pacific (IAST) as part of Workstream 1 to lobby governments and international bodies.
5. Completed a detailed risk assessment of Service Providers and Investment Managers.

Ongoing actions

Many of the actions we have taken over the last twelve months are part of an ongoing process. The following are some of the most vital ongoing actions:

1. Monitoring the risk of modern slavery in our operations and our supply chain.
2. Identifying and assessing which sectors and geographies involve heightened modern slavery risks.
3. Focusing on areas of our operations where there is limited visibility and determine whether those areas carry high modern slavery risks.
4. Engaging with our suppliers, including our investment managers, by holding regular meetings to discuss, collaborate and cooperate on modern slavery matters.
5. Requiring the Modern Slavery Questionnaire to be completed as part of our onboarding due diligence for suppliers and investment managers.

Structure, operation, and supply chains

Organisational structure and business

First Super operates as a Trust, and the Trustee Board is obliged to prudently invest funds and ensure First Super is managed in the best interests of members.

First Super’s Board is made up of 12 directors: five Directors nominated by the TFTU, five nominated by employer associations or employer sponsors, and two Independent Directors. There is also an Associate Employer Director.

Directors are appointed by the Board based on skills, qualifications, and suitability, and are obliged by law and our own governing policies to act in the best financial interests of all First Super members.

First Super’s board has established committees to deal with all areas of the Fund’s management. These committees make recommendations to the Board, helping it to discharge its duties.

First Super employs about 40 employees and works with a range of independent advisors, consultants and service providers who assist in the daily running of its operations.

For its investments function, First Super invests in a range of asset classes using Australian and international investment managers.

Advisors and service providers are appointed following due diligence processes, and these may change from time to time.

Our operations

In the 2024/25 financial year, First Super had more than 70,000 members and managed more than \$5 billion in funds under management.

To achieve our purpose of building members’ retirement savings, First Super manages a large investment portfolio spanning Australian and international equity markets, direct property, infrastructure, fixed interest, cash and private equity investments.

We recognise that certain sectors and geographies pose greater modern slavery risks (such as property development) and, therefore we have engaged with our investment managers to better understand the processes they have in place to guard against modern slavery.

Further information on our approach to investing can be found in our *Annual Report*, *Product Disclosure Statement* and *Investing Your Super* guide, all of which are available on First Super’s website.

Our supply chain

First Super’s supply chain includes a wide range of material and non-material service providers.

The material service providers we use include administration, custody, investment services, asset consulting and group insurance. Our non-material service providers include, among other things, printing and mail house services, legal advice, marketing services, research and analysis, and telecommunications.

As part of First Super’s Investment strategy, we have carefully appointed 15 investment managers with either offices or headquarters based in Australia, two investment managers that are based in the United Kingdom and other investment managers based in Denmark and the USA. Currently, ~55% of First Super’s FUM is invested within Australia and ~45% in international investments. A more complete summary can be found on page 28 of First Super’s Annual Report 2024/25.

The Fund focused on investigating its investment portfolio to ascertain whether our investment managers have appropriate structures, processes, policies and procedures in place to combat modern slavery. Regarding current investments, First Super has 15 investment managers based in five jurisdictions and investments in more than 77 countries.

In 2025, the Fund engaged in its own risk evaluations of our investment managers. The results of which are discussed in the following pages.

Most of First Super’s supply chain is located within Australia with further suppliers from the USA, UK, and New Zealand. These suppliers will likely have global supply chains. Through our surveys, we are working to better understand these supply chains and seek out any exposure we may have to modern slavery.

Geographic location – First Super suppliers		
Australia	58	88%
USA	4	6%
Europe	1	1.5%
UK	2	3%
New Zealand	1	1.5%

Identifying modern slavery risks in our supply chain and investments

Over the past year we have carefully assessed the scope of our supply chain to identify the areas at greatest risk of modern slavery. Building on external research we have identified certain elements of our supply chain that carry greater risk. We have also sought to understand geographic and sector risks in relation to our investments.

First Super has used research from Walk Free, an international human rights group that have developed a Global Slavery Index. This research identifies high-risk industries and geographies across the globe. It has demonstrated that activities such as IT procurement, e-waste disposal, sourcing of promotional merchandise and facilities management (such as cleaning and building maintenance), for example, all give rise to the risk of modern slavery. High risk geographies can include conflict-affected zones, countries where there is a weak rule of law, high corruption or a significant population of migrant workers. We will focus on achieving continual improvement in our ability to identify, manage, address and remediate modern slavery risks and impacts.

First Super understands that businesses cannot be expected to monitor every single supply chain back to its source. However, we accept the obligation to investigate and understand the risk of modern slavery in our supply chains, and to put reasonable steps in place to respond to these risks.

- **Sector and industry risks:** Certain industries, such as textiles, cleaning and agriculture, are globally recognised as high-risk sectors.
- **Product and services risks:** Certain products, such as cotton and rubber, are recognised globally as high-risk products, while services such as cleaning often involve lower wages and a degree of manual labour that has high modern slavery risks.
- **Geographic risks:** Some countries may have higher risks of modern slavery as a result of conflict, poor government and political instability.
- **Entity risks:** Some entities which have poor governance, or a record of treating workers poorly may have modern slavery risks.
- **Invisible Risks:** First Super will identify the parts of its operations or supply chains that we do not have visibility over and consider if they may involve modern slavery risks.

Examples of how risks can be assessed in the supply chain may include making appropriate enquiries into accommodation and travel to ensure that the services we are using are not involved in the degradation of workers.

Additionally, the marketing team manages risk by ensuring that suppliers of promotional products have manufacturing systems that do not involve modern slavery.

Another high-risk area is in cleaning and catering. Subsequently, it is necessary to be vigilant when engaging these services and assess the risks of modern slavery.

Finally, First Super is careful when setting time frames for work to be completed. It is important to ensure that these time frames are not unrealistic to minimise the risk that suppliers are only able to deliver the desired products or services through exploited labour.

First Super investments

Investments carry with them a heightened risk for modern slavery. First Super is in an industry that is at a low risk and is in a country that requires far greater transparency and accountability than many others. As such, when investment managers are acting on our behalf in global markets the risks associated with modern slavery grow exponentially. The engagement with global investments and supply chains presents greater difficulty in monitoring modern slavery and greater risk of it occurring.

However, the acknowledgment of this difficulty does not excuse inaction. First Super strives to always work with investment managers that act responsibly and ethically and invest our members' contributions the same way. We have not identified any instances where we have invested in, or benefited from, modern slavery. It is vital to remember that even though we have not identified any such instance does not mean it is not happening. We will continue to work closely with investment managers to identify and remedy instances of modern slavery we discover across our investments.

Actions taken to assess and address risk

Internally, First Super has many processes, people, and policies in place to manage risk of modern slavery.

First Super has a risk assessment framework in place to evaluate risks and achieve optimal outcomes. Once a risk has been identified, the relevant employee will make the business aware of that risk and the organisation will then determine the most appropriate response.

As part of this process flow there are efficient reporting mechanisms in place to ensure identification of, and response to risks. First Super recognises risks relating to certain sectors, industries, products and services, as well as geographic regions. Potential risks are dealt with through our Modern Slavery Policy and staff training.

As part of our risk assessment process, First Super conducted a Modern Slavery Questionnaire, which included all material and non-material service providers and vendors.

The questionnaire feedback provided insight to help us understand the procedures that our service providers have in place for managing modern slavery risk. In addition, the questionnaire responses assisted our review by identifying and assessing the associated level of modern slavery risk in our operations and supply chain.

Material service providers are responsible for areas such as administration, asset consulting, auditing, custody, and group insurance. Non-material service providers include actuaries, marketing, legal advice, telecommunications, strategy, research, and analysis.

First Super has also conducted a risk assessment of its Material and Non-Material Service Providers which considered many vectors for risk. Included in our analysis were inherent risks, such as those of the service provider's sector, geography, labour profile, business and service models, and their key suppliers. Further risks assessed were their governance, policies and controls, their training, due diligence, and upstream risks. We then applied a rating system of low to high risk. This approach demonstrated that all of the material and non-material service providers considered were either low or moderately-low risk. We also assessed our Investment Managers and determined that their operations were all rated low-risk. However, Investment Managers include the additional risks of their investments. These are discussed further below as part of the *Investments held by First Super* section below.

First Super is committed to open and transparent business practices and aims to ensure that our approach to modern slavery adheres to the requirements of the Act and associated legislation. We expect our investors, suppliers, and business partners to adhere to these same standards.

Human rights analysis already forms part of our process for integrating environment, social and governance factors into our investment decision-making.

The risk processes we use includes an assessment of high-risk geographies, services and products, and we are planning additional work to identify how these procedures can be enhanced to integrate risk assessment specific to modern slavery.

Many people at First Super take responsibility for mitigating the risks of modern slavery.

Position Title	Role	Responsibility
Compliance Manager	Prevent illegal, unethical or improper conduct within the Fund by complying with outside regulatory requirements and internal policies	Develop, review and update compliance policies, monitor Fund activities to ensure adherence to policies and ensure that First Super complies with external regulatory requirements.
Executive Manager Governance and Risk Manager	Manage outsourced service providers	Develop and implement outsourced contract management strategy, manage contracts, monitor and report on service delivery and ensure that procurement programs meet with prudential requirements and First Super's internal policies.
Audit and Compliance Committee member	General oversight and management of the audit and compliance functions of the Fund	Act honestly, exercise due diligence as a superannuation trustee and avoid improper conduct.
Board	Provide strategic governance for the Fund, ultimate decision body.	Review and approve the Policy and endorse the annual regulatory returns.

By including many tiers of oversight, First Super can monitor for risks of modern slavery across our supply chain and investments. This includes the development of internal policies by the Compliance Manager and the management of outsourced supply chains. At a committee level, members of the Audit and Compliance Committee exercise due diligence and strive to avoid improper conduct. Ultimately, responsibility rests with the Board, members of which have made the commitment to combat modern slavery.

Due diligence, remediation, and reporting

When engaging new suppliers, First Super undertakes due diligence to ensure it only partners with organisations that share our commitment to combating modern slavery. We have open lines of communication with other investors, and suppliers so we can continually assess, understand, and limit the risks and impacts of modern slavery in these supply chains. Additionally, First Super has an established avenue for remedying any concerns with its suppliers through documented grievance procedures.

An enhanced due diligence regime has been implemented following a scoping exercise that identified the breadth of organisations and suppliers associated with First Super and assessed any links to modern slavery.

New suppliers are subjected to heightened scrutiny, and any engagement is pre-empted by contractual agreement requirements requiring their compliance with the Act.

First Super has also developed a reporting process whereby employees can anonymously and confidentially report actual or suspected breaches of the Fund's Modern Slavery Policy and Code of Conduct, as well as the Act. Any disclosures are investigated and reported to the appropriate manager. This system ensures that all reports are managed in an efficient, fair, and timely manner.

First Super recognises the dedicated role it can play in employing its reputation and industry position to leverage for broader systemic change. First Super strives to demonstrate a level of compliance with the Act that serves as a beacon to other sectors of the industry and businesses in general. As part of this role, First Super has engaged in advocacy actions, joining with civil society and industry bodies to push for improvement in at-risk sectors and in geographic regions that pose a substantial modern slavery risk.

First Super assesses risk by:

- Reviewing First Super's operations and supply chain;
- Mapping key risks associated with business operations and supply chains, and using this information to undertake a detailed risk assessment;
- Assessing the risks of modern slavery in the investment portfolio;
- Developing tools and policies to monitor high risk suppliers and mitigate associated risks; and
- Setting up a mechanism to all people to safely report modern slavery risks.

First Super, when engaging with suppliers ensures that they have measures in place to combat modern slavery throughout their business operations. As part of this process we:

- Will strive to improve supplier awareness of modern slavery risks
- Will take steps to build a transparent and collaborative engagement with suppliers
- Will ensure workers in supply chains have access to information about their rights
- Will clearly communicate expectations to suppliers
- Will leverage our relationship with suppliers to ensure they monitor modern slavery risks; and
- Will develop a supplier engagement plan to tailor a response that focuses on high-risk suppliers.

Industry collaboration

First Super has worked with industry bodies to better understand its role in preventing modern slavery. This includes participation in the Australian Council of Superannuation (ACSI) Investors meetings and events to understand what the superannuation industry is doing as a whole.

First Super maintains ACSI membership to support its work in analysis of the quality of ASX 200 companies' modern slavery statements and thus improvement of modern slavery risk management, development of industry guidance, company engagement and policy advocacy.

First Super has also joined Investors Against Slavery and Trafficking. IAST brings together many financial institutions to leverage our strength as investors. This includes direct engagement with businesses, governments and international bodies to create change.

First Super policies

Modern Slavery Policy	First Super's policy document which provides specific policies, roles, and actions surrounding modern slavery. These are incorporated in related policies, processes frameworks and action plans that apply across our business operations. This was updated in July 2024.
Whistleblower Policy	This policy applies to all First Super staff and service or supply providers. It includes breaches of the law and unsafe work practices that occur under modern slavery. It protects those who come forward about these issues.
Outsourcing Policy	Outlines how and when risk is assessed and due diligence performed for all suppliers (in Tiers).
Risk Management Controls	Specific risk management controls have been implemented in our enterprise risk management system related to modern slavery.
Due diligence questionnaire	Issued as part of large tenders or contract renewals to suppliers, and as part of investment manager due diligence.
Modern slavery model clauses	Incorporated in relevant large new or renewed contracts, and investment management agreements.

Ongoing due diligence

First Super's due diligence when onboarding new suppliers requires that the supplier not use any form of forced, bonded, compulsory labour, slavery or human trafficking. This is supported through First Super's internal processes which:

- Provide staff training to ensure that all staff have an understanding and awareness of their obligations to this Policy and to identify risks of modern slavery within First Super and its supply chain.
- Provide a framework for remediation, so that where breaches occur, the adverse impacts are addressed through documented processes such as formal apologies, compensation or ceasing certain activities or relationships, in addition to more pro-active measures such as incorporating a positive culture where whistle-blowers are encouraged to speak up.

This is also achieved externally through the following processes:

- When engaging new suppliers, we will seek evidence of processes and policies that they have in place regarding human trafficking, forced labour, human rights and whistle blowing.
- We will conduct investigations into existing commercial relationships to ensure that they have in place mechanisms to address the risk of modern slavery.
- We will review potential risks regularly, and consider audits and spot-checks.
- In order to minimise the potential for any problems, we will require the businesses that we work with to abide by our requirements and address modern slavery concerns in their workplace policies.
- We will work alongside our suppliers in order to maintain standards and improve the situation of workers across the supply chain.

Investments held by First Super

First Super asked investment managers if they have policies or processes in place to assess and manage modern slavery. We were satisfied with their responses. Key takeaways include that most of our investment managers do have a Modern Slavery Statement even if they are not required to. This gives us further confidence that this issue is taken seriously across our investments. As part of these statements, managers demonstrated that actions are being taken through increased risk management processes. This included analysis of key risk criteria for modern slavery.

First Super asked investment managers about their visibility of modern slavery in their supply chains. Their options were, developing, moderate, or high visibility. Most selected moderate, first stating that due to their industry they were not at a high risk of modern slavery. However, they also acknowledged that they could gain greater visibility on suppliers further down the supply chain while engaging in due diligence during the procurement process.

When asked whether they assess and manage modern slavery risks in their supply chain our investment managers said they did through multiple channels. First, due diligence is completed as suppliers are brought on. Secondly, most tier one suppliers are kept to the same geographic regions as the investment managers, meaning that they avoid geographically risky areas. Finally, gap analysis and deep dives into specific vulnerabilities provide ongoing opportunities to find modern slavery. IFM is particularly dedicated to this process.

We also asked about training, staff and procurement, and what training is provided to staff to identify modern slavery risks. Specific staff training sessions for modern slavery are not yet a universal practice. However, some managers provided staff training. Ausbil and IFM provided notably in-depth training. Similarly, they also both reported particularly rigorous screening processes when procuring new suppliers. When asked about the use of low-skilled migrant workers, some investment managers acknowledged their use in the supply chain from cleaning staff, caterers and business travel.

We also asked our investment managers about where responsibility lay for the governance and reporting of modern slavery issues. Ultimately it lay with the Board of Directors. However, CEOs and executive management also took responsibility. Additionally, we queried day-to-day responsibilities, where compliance officers and investment teams played key roles.

First Super's investment managers use many methods to track, manage, report, and prevent instances of modern slavery in their supply chain. The methods to address modern slavery shared key procedures in the procurement process, whistle-blowing policies, and specific procedures for compliance teams, especially around medium and high-risk suppliers. More broadly, feedback was obtained through annual assessments, deep dives of particular suppliers, and engagement with unions. Should instances of modern slavery be identified in supply chains, many of First Super's investment managers opt for remediation over termination. This allows the organisation to push for improvement and retain influence, rather than stepping away.

We asked our investment managers if their ESG integration approach included an assessment of modern slavery risks in the companies they invest in. All investment managers consider it a key aspect of due diligence when investing in companies. Partially, this is because if instances of modern slavery are found it will cause cash flow and labour issues as the issue is remediated, but also due to the more significant moral concerns. To avoid these potential issues, First Super's investment managers complete due diligence, including gathering modern slavery details and questionnaires, completing risk assessments and conducting interviews. If possible, they will use the size of their investment to influence practices and policies. As an example, Ausbil has a specific model for assessing these risks.

First Super also queried how these same risks are addressed. In high-risk cases, Investment Managers have used site visits, interviews, and modern slavery workshops for investee companies without a policy. Risk is then continually monitored with specific reporting requirements. All of First Super's investment managers have plans and processes to track, manage and report instances of modern slavery. Roc Partners, Ausbil and IFM all take further steps to monitor the effectiveness of their approaches.

How First Super assesses the effectiveness of these actions

First Super understands it will take time and a collective effort to effectively mitigate and eventually eliminate the practice of modern slavery. We believe that incremental change by numerous bodies is the most effective means of transforming and enhancing both

national and global awareness of these issues. We are committed to the objectives set out in this statement and to the ongoing assessment of the efficacy of our actions.

Consultation with entities we own or control

Super Benefits Administration Pty Limited (SBA), is wholly owned by First Super Pty Ltd and performs administration services for us. We meet with the senior executive of SBA regularly to discuss what we expect, to raise awareness and understand their approach in mitigating modern slavery risks.

We have also provided them with awareness training and our documentation, and offered our assistance to them, including access to our governance team.

Looking ahead

First Super understands the importance of continually enhancing its understanding, monitoring and management of modern slavery risks within its organisation and supply chain. First Super is committed to deepening its capacity to identify, evaluate and respond to modern slavery risks, including ongoing continuous assessment and enhancement of due diligence procedures and policies.

As part of our commitment to continuous improvement, First Super undertakes the following measures:

- **Continuous policy assessment and evaluation.** Analyse and examine the current policy and determine which areas require action or amendment. This is not only for our Modern Slavery Policy, but others including the whistleblower, investment governance, and travel policies. This extends beyond modern slavery to include a broader consideration of human rights in all subsequent policies.
- **Training.** Continue to provide up-to-date training for all employees to ensure they are capable of identifying and assessing risks of modern slavery and cognisant of the mechanisms for reporting grievances.
- **Engagement with suppliers.** Continue to work alongside suppliers to ensure that all new and existing suppliers are aware of First Super's policy towards modern slavery and, where appropriate, have their own processes and procedures in place. Furthermore, to continue directly engaging with them on the topic to better understand how both organisations can further grow. Where possible we will also share our own insights, such as those from our risk assessments, on what our suppliers can do to combat modern slavery.

- **Continued monitoring of Investments:** First Super will monitor how members' contributions are invested to continue fighting against modern slavery. This will be done through continued dialogue and work with investment managers.
- **Collaboration with civil society and industry bodies.** Engage with its civil society and industry bodies including the Super Members Council of Australia (SMCA), Department of Home Affairs, Australian Institute of Company Directors (AICD), Australian Council of Superannuation Investors (ACSI) and the Australian Shareholders Association (ASA). We are always looking to expand the sphere of industry bodies we engage with on modern slavery.

This year, First Super joined Investors Against Slavery and Trafficking. We have joined its Workstream 1 which lobbies governments across the Asia Pacific and international bodies to create tangible improvements in modern slavery prevention. First Super aims to be an industry leader in the elimination of modern slavery.

Through consistent monitoring and assessment, the Fund reviews and evaluates the success of our modern slavery risk control measures. As discussed above, while responsibility rests with the Board there are many First Super staff who share in this responsibility. As such, we are regularly reviewing supply chains and investments as part of operations. This includes assessment of policies and practices.

Approval of First Super's Modern Slavery Statement

In preparing this Statement the trustee of First Super consulted with its directors and executive officers.

Two specific requirements are necessary for this statement to be approved:

- the statement must be approved by the Trustee Board, and
- the statement must be signed by the CEO.

This statement was endorsed and approved by the First Super Board at its meeting on 15 December 2025.



Bill Watson
Chief Executive Officer

Important information: The material contained in this bulletin is accurate and reliable as at December 2025.

This document contains general advice which has been prepared without taking into account your objectives, financial situation or needs. You should consider whether the advice is appropriate for you and read the Product Disclosure Statement before making any investment decisions. To obtain a copy of the PDS and Target Market Determination please contact First Super on **1300 360 988** or visit our website **firstsuper.com.au/pds**.

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