

# Modern Slavery Statement

## Background

This statement is produced to provide interested stakeholders with information about Trustees Executors Limited (TEL) for the purpose of understanding the potential exposure to modern slavery risk.

Modern slavery includes situations where coercion, threats or deception is used to exploit victims and undermine their freedom. This includes practices such as:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage
- Child labour.

TEL strongly supports global initiatives to eliminate modern slavery practices.

## About TEL and its supply chains

### Structure

TEL is a privately owned New Zealand company that was founded in Dunedin in 1881. Originally named The Trustees, Executors, and Agency Company of New Zealand (Limited) it was incorporated under the Companies Act 1860 on 6 July 1881 and was re-registered to become a company under the Companies Act 1993 on 30 June 1997.

Its ultimate holding company is Sterling Grace (NZ) Limited.

TEL wholly owns a number of nominee companies, which it uses to hold client money in a fiduciary capacity.

### Operations

TEL is a trustee company under the Trustee Companies Act 1967. The Trustees Executors Limited Act 2002 also provides the company with powers in relation to acting as an executor. Additionally, the company holds licences under the Financial Markets Supervisors Act 2011 and Financial Markets Conduct Act 2013. All licences are issued by the Financial Markets Authority (FMA).

Current licences held are:

- Supervisors Licence
- Corporate Independent Trustee Licence
- Financial Advice Provider Licence
- Discretionary Investment Management Services Licence
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The business has moved through a transitional phase by way of divesting various operations of Personal Client Services and Fund Administration Services which will leave the Corporate Trustee and Supervision business operations as the core continuing service of TEL that include:

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- Acting as a supervisor and trustee of registered managed investment schemes and debt offers and as a statutory supervisor of retirement village operators

### Supply chains

TEL suppliers are primarily professional service companies including ; software cloud service providers, legal advisers, auditors, consultants, , recruitment consultants, , banks, and other services providers commonly utilised by a business operating in a New Zealand based office administration environment.

## Modern slavery risks in Trustees Executors' operations and supply chains

TEL has assessed the risk of modern slavery as low within its business and immediate suppliers. Consideration has been given to the sector and industry, products and services, types of investments made, and geographic risks such as the rule of law and governance. Nonetheless, TEL is aware of the harm

modern slavery presents, and that these risks can exist, knowingly or unknowingly further along the supply chain or within that of its clients.

### **TEL's clients**

As a trustee and/or custodian of managed investment schemes, TEL will hold assets on behalf of KiwiSaver, superannuation and other pooled scheme investors. Investment managers that manage these schemes create diversified investment portfolios, meaning some funds hold positions in companies that approximate the global market. Where TEL monitors these managers in a supervisory capacity, TEL seeks to understand if environmental, social and governance (ESG) factors are considered when making investment decisions.

### **Actions taken to assess and address modern slavery risks**

TEL will assess and address modern slavery risk according to the risk factors presented. Assessment criteria is made with consideration to whether TEL may cause, contribute to, or may be directly linked to modern slavery risks.

Should there be evidence of a considered risk, TEL will where appropriate:

- obtain information on suppliers and their position in relation to sub-suppliers
- undertake risk assessments on suppliers in regard to modern slavery risk
- update supplier contractual terms to address modern slavery risks
- obtain commitment to adhere to a supplier code of conduct
- provide staff training on modern slavery risks
- monitor and treat reported incidents.

If on initiating information requests and should the supplier be unwilling to engage with TEL in order for it to assess its exposure to modern slavery risks, TEL may choose to ultimately cease the supplier relationship.