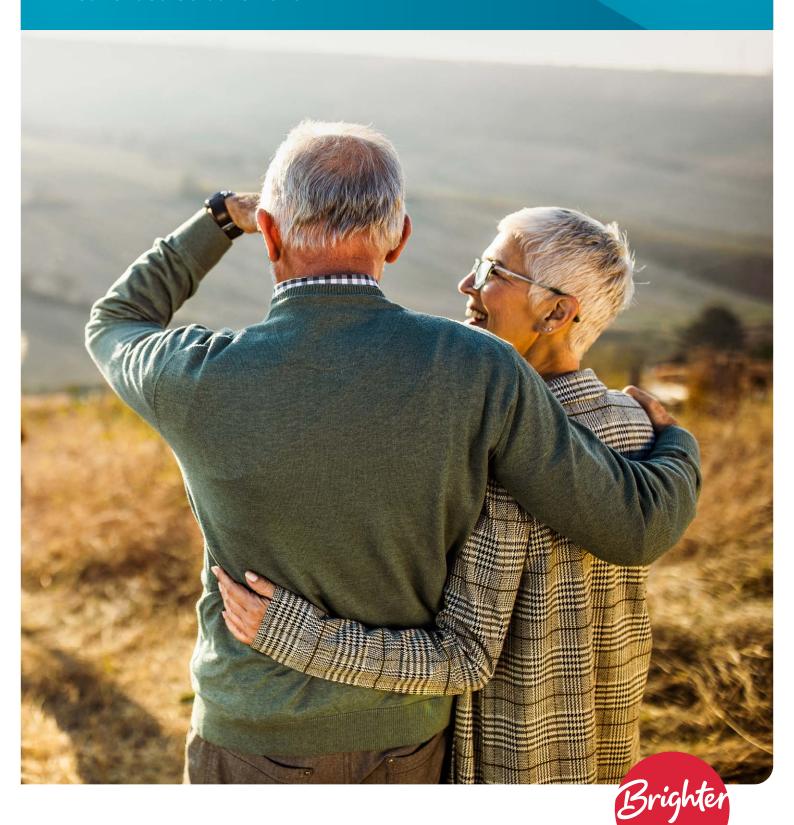
# **Brighter Super Sustainability Report**

Year ended 30 June 2025



# **Foreword**



As one of Queensland's largest superannuation funds, the fourth-largest non-government financial institution in Queensland, and the super fund for the Queensland local government and energy industries and members nationally, Brighter Super is proud to share our second *Sustainability Report* covering the 2024/25 financial year (FY25).

During FY25, we delivered on the key targets that we previously set for ourselves.

In 2023, our Board made a commitment to targeting by 2030 a 30% reduction in carbon emissions intensity ( $tCO_2$ e per \$1 million invested) across the listed equities portfolio below its 2022 levels. At the end of June 2024, we achieved that 30% reduction, much earlier than expected. This was accomplished through the positioning of our outsourced investment managers, emissions reduction at portfolio companies and overall market returns during the period.

This reduction in carbon emissions intensity is expected to materially lower exposure to climate-related financial risks within our listed equities portfolio. Based on scenario analysis<sup>1</sup>, the estimated capital value at risk due to climate impacts could reduce by approximately \$280 million, a meaningful reduction in the risk of loss due to climate impacts as the world changes.

During FY25, we continued our program to reduce the carbon emissions intensity of our listed equities portfolio and reaffirmed our commitment to our climate risk management strategy. To ensure we solidify our achievements so far, we set a further goal of a 50% reduction in the climate emissions intensity of our listed equities portfolio over our 2022 baseline by 2035. This is expected to further reduce our capital value at risk of loss due to climate issues in our listed equities portfolio to approximately \$470 million.

We are also committed to setting broader and higher climate targets for ourselves that take advantage of the opportunities posed by Environmental, Social and Governance (ESG) issues, as well as mitigating climate risks. This year, we expanded the scope of our targets to also include capitalising on the opportunities of the energy transition, through our plan to invest \$1 billion in the renewable energy sector by 2030, more than doubling our exposure compared with 2024 levels.

We committed to a stewardship program which will cover our priority domestic listed companies, helping us to understand our ESG exposures through holding their stock, as well as adding our voice to advocating for best practice in the ESG areas that matter most.

<sup>&</sup>lt;sup>1</sup>Refer to section 3.2.3 'Scenario analysis' for the 1.5°C divergent net zero assumptions.

Finally, we worked hard to continue our uplift in reporting and monitoring through an increased focus on our data, which meant we were able to expand coverage of our climate reporting to include corporate bonds as well as listed equities.

More broadly, this year Brighter Super has made a genuine impact on our commitment to investing in the communities where we and many of our members work and live, through our *Queensland Investment Strategy*. We have committed just under half of the \$500 million additional investment to Queensland announced as the foundation of our strategy, and as we have sought to implement it, we have established in coordination with our partners a detailed community and social risk assessment process to ensure the assets we acquire meet community expectations.

Within Brighter Super, we continued to advance our own governance arrangements including the effective implementation of the *Financial Accountability Regime* which strengthens and clarifies the accountability obligations of the Board and management. We enhanced our governance oversight of our ESG obligations by clarifying roles and responsibilities of ESG risks and issues within the organisation.

We have commenced implementation of our *Innovate Reconciliation Action Plan* and have made meaningful improvements in our team's understanding of the cultural challenges experienced by First Nations members, as well as in the way we service those who identify as Aboriginal or Torres Strait Islander.

We have focused on our people who make all our work and service happen, lifting our organisational health to the top decile as measured by an external consultant. We have reduced our gender pay to 14.4%, a reduction from 2023/24 reporting and significantly lower in comparison to the Australian average of 21.8%.

Moving forward, our focus remains on improving our ESG risk management practices both in our investment process and in our operating business. This way, we can continue to live up to the promise we make to our members to steward their assets safely through to their retirement, reducing risk and ensuring we meet the expectations of Queensland, our communities and our members as we do so.

**John Smith** 

**Chair**, Brighter Super November 2025 **Kate Farrar** 

Chief Executive Officer, Brighter Super November 2025

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### 1.1. About this report

Brighter Super has prepared a Sustainability Report for the financial year 2024/25 in accordance with our commitment to a fund-wide focus on our *Environmental, Social and Governance (ESG) Framework*.

This report is consistent with the intent of our *Sustainable Investment Policy*, which can be found on our website at **brightersuper.com.au**.

This year, Brighter Super has taken the learnings from our work with our external consultants and established a two-level internal assurance process. As a medium-sized fund, we will adopt the appropriate level of external assurance when mandatory climate reporting is required from the 2026/27 financial year onwards.

This Sustainability Report is intended to provide our members and other stakeholders with an overall view of the actions Brighter Super is undertaking to measure our Environmental, Social and Governance impact from the way in which we do business. Currently, the Australian Accounting Standards Board, Australian Sustainability Reporting Standards, S1 'General Requirements for Disclosure of Sustainability-related Financial Information' and S2 'Climate Related Disclosures' do not apply to Brighter Super. Whilst we have considered these Standards for guidance and best practice, this Report has not been prepared in compliance with these Standards.

### 1.2. About Brighter Super

### 1.2.1. A proud history, a strong future

Brighter Super is a 100% member-owned, Queensland-based superannuation fund, with over 280,000 members and more than \$35 billion in funds under management as at 30 June 2025.

We are dedicated to being 'right by your side', guiding members to retire confidently, with a commitment to solid performance, low fees, personal support and financial advice.

Brighter Super does not have shareholders, nor pay commissions to financial advisers. We work hard to keep our fees and costs as low as possible, and our members come first in everything we do.

Formed from the merger of LGIAsuper, Energy Super and the acquisition of Suncorp Super, Brighter Super is a new kind of fund – one that blends public sector strength, industry insight and retail innovation. As a sustainable and competitive fund with a strong focus on Queensland, we are particularly proud of our track record of delivering strong and reliable investment returns, and lower fees, to improve our members' retirement outcomes.

We are an open fund, welcoming members from our foundation industries in the government, finance, electrical and energy sectors, alongside the wider community. We are currently the fourth-largest non-government financial institution in Queensland, serving Australians everywhere.

This year marks 60 years since the Fund was founded to serve Queensland local government employees and their spouses. Our legacy of putting members first has never wavered, as we remain committed to helping our members live confidently though every stage of life.

### 1.2.2. Commitment to members

We are proud to be a sustainable, medium-sized superannuation fund providing our members with a personal service. We strive towards sustainable growth and efficiency so we can offer services that meet all our members' needs, delivered with personal care. We're all about personal connections, and guiding members to retire confidently.

Personal relationships with our members make us different from other superannuation funds. Our promise is to be 'right by your side', and we have over 40 superannuation specialists who travel around Queensland to meet with our members where they work and live, and serve members virtually nationally.

As Brighter Super grows, we remain committed to the strong personal relationships and connections that our foundation funds were built upon.

### 1.3. Brighter Super's approach to ESG

ESG - short for Environmental, Social and Governance - is a set of factors which can be used to assess an organisation's impact on society and the environment, as well as its transparency and accountability.

Through our ongoing activities, Brighter Super considers a range of ESG risks and opportunities but prioritises those which we believe are likely to have the greatest impact on member outcomes, and on our ability to continue to offer our 'boutique at scale' services.

This is consistent with our *Risk Appetite Statement*, which articulates a need to take a considered approach to ESG given it is a dynamic and increasingly stakeholder-driven aspect of prudent financial management in members' best financial interests.

Brighter Super recognises our greatest leverage when considering ESG issues arises from our ability to use our responsible investing principles to help ensure that member investment returns are protected, or opportunities are identified.

We believe that a portfolio asset or company's approach to managing ESG issues may impact long-term financial returns. Accordingly, Brighter Super believes that ESG issues are material investment issues that should be considered as part of the investment process. We focus on aspects of our investment portfolio where there is the greatest impact and where we have the most significant information available.

Outside of investing our members' retirement contributions, Brighter Super also operates to provide services to our members across both Queensland and nationally. We are a significant financial institution in Queensland, in the industry and from a regulatory perspective. We are committed to conducting ourselves in a way that earns and maintains the trust of our members, communities and stakeholders in everything we do.

This includes applying ESG principles to the way Brighter Super conducts our own operations, with a focus on the areas that matter for delivering superannuation services. We are always seeking to continuously improve our outcomes and approach.

Brighter Super is also concerned with ESG issues as they relate to our industry. We seek to engage with industry organisations and thought leaders to provide broader stewardship where we are able.

### 1.4. Kev facts

- More than \$35 billion funds under management as at 30 June 2025.
- More than 280,000 members with 300,000 accounts as at 30 June 2025.
- 85% of our funds under management is from Queensland members.
- Fourth-largest non-government financial institution in Queensland, based on funds under management.
- Over 40 member superannuation specialists working across Queensland.
- Four offices: two in Brisbane, one in Sydney, and one in Townsville.
- 30% reduction in listed equities carbon emission intensity from 2021-2022 to 2024-2025.
- First company greenhouse gas assessment in 2024 complete.
- Innovate Reconciliation Action Plan in place from November 2024.

### **CASE STUDY**

# Brighter Super's support for real estate in Queensland

In December 2024, Brighter Super established a \$100 million commitment to local real estate. Partnering with global asset manager Barings, the commitment focuses on industrial properties across the state, from South East Queensland to regional areas.

These assets are essential to our communities, supporting jobs, supply chains and economic growth. With Queensland's population booming, infrastructure expanding, and the 2032 Olympics on the horizon, the timing is right to invest locally.

This strategy aims to deliver strong, long-term returns for members while helping build a stronger Queensland economy.

### 1.5. Proudly Queensland

Brighter Super has a long and proud history that continues to be focused on Queensland. In 2025, Brighter Super celebrated 60 years of continuous service to the Queensland local government sector and is proud to be the super fund that is dedicated to the Queensland electrical sector.

In May 2024, Brighter Super launched its *Queensland Investment Strategy*, an initiative designed to strengthen the communities where many of our members live and work. This strategy reflects our commitment to responsible investment, regional development and long-term value creation for members.

As part of this initiative, Brighter Super pledged an additional \$500 million in new capital to Queensland, building on the \$1 billion already invested across the state. These investments are focused on sectors and projects that support job creation, infrastructure development and economic resilience while delivering strong, risk-adjusted returns for our members.

During 2024/25, Brighter Super committed \$225 million of this \$500 million to new initiatives:

- \$100 million to Queensland industrial real estate, partnering with global investment manager Barings.
- \$75 million to vertically integrated Queensland agricultural assets with local agribusiness investor Riparian Capital Partners.
- \$50 million in venture capital investments, alongside iconic investment manager Queensland Investment Corporation (QIC), supporting local companies as they move into their next stage of growth.

By identifying opportunities that align with both financial performance and positive social impact, Brighter Super is helping to build a more sustainable and prosperous Queensland. This approach supports our broader commitment to responsible investment and ensures that our members' retirement savings contribute to meaningful outcomes in their communities.

### **CASE STUDY**

### Brighter Super commits \$75 million to Queensland agriculture and water assets

Brighter Super has committed \$75 million to support agricultural development across regional Queensland. The funds will be managed by Riparian Capital Partners (RCP) and directed toward farmland, agribusinesses, agricultural infrastructure, and water entitlements. These assets play a key role in food production and regional economies.

RCP specialise in investing in agricultural assets that contribute to food security and are primarily located in regional areas. Their approach involves partnering with producers and agribusinesses to improve financial performance and long-term sustainability.

To facilitate this, Brighter Super has established the Queensland Riparian Agriculture and Food Transition Trust. The trust will focus on partnering with Queensland producers to help expand their operations and improve efficiency.

For members, the commitment aims to:

- Provide stable, long-term financial returns.
- Support regional economic development.
- Contribute to sustainable food production.

This initiative reflects Brighter Super's commitment to investing in Queensland and supporting industries that have long-term value for both members and communities.

### 2.1. Our approach to ESG

For Brighter Super, our ESG priorities are defined and outlined as follows:

- **Environmental** (E) Brighter Super's impact on the natural environment or the impact of the environment on Brighter Super. This includes consideration of: climate change and emissions (Brighter Super's primary focus to date with respect to our financed portfolio); biodiversity; resource use and depletion; contamination and pollution; waste.
- **Social** (S) Brighter Super's social impacts on our stakeholders, i.e. how we treat our members, people and communities. This includes consideration of: members' best financial interests, Brighter Super's overarching legislative requirement; product reputation; anti-discrimination, bullying and harassment, labour and employment; diversity and inclusion; Aboriginal and Torres Strait Islander cultural matters; supply chain integrity including modern slavery; data protection and privacy; local communities and engagement.
- **Governance** (G) Brighter Super's governance, integrity and accountability. This includes consideration of: corporate governance (Brighter Super's significant focus in recent years as a regulated organisation); anti-money laundering and counter-terrorism financing; remuneration; tax governance and risk; conflicts of interest and the responsibilities associated with being stewards of equity capital, including proxy voting, active engagement and advocacy at an investment and an industry level.

### 2.1.1. Materiality assessment

Because Brighter Super recognises that our greatest leverage when considering ESG issues arises from our work on ESG in our investment portfolio, this has been the focus of our materiality assessment. Within our work on sustainability in our investment portfolio, we have prioritised actions based on financial impact, community and regulatory expectations.

Over the last decade, a global coalition of communities, governments and regulators has shown an increasing focus on the issue of climate change and the need for broad-based social change to mitigate its impacts on the world now and into the future.

In 2022, Brighter Super commissioned a total carbon footprint exercise with a third-party data provider, which included obtaining data from underlying managers across asset classes, including unlisted investments. As part of this project, it was estimated that approximately 75% of the Fund's financed emissions were contributed by the listed equity assets, representing around 52% of the Fund's assets.

We therefore determined that Brighter Super's primary area of focus from a materiality perspective should be the climate risks within our investment portfolio, initially within the listed equities asset classes.

### 2.1.2. Governance

At Brighter Super, the Board of Directors play a pivotal role in governing the Fund for the benefit of our members, adhering to the Fund's *Trust Deed* and relevant legislation. The Board of Directors hold ultimate responsibility for managing risk, including governance and oversight of actions addressing ESG risks.

Over the past year, Brighter Super has responded to increasing expectations regarding governance in the superannuation industry, captured through the Australian Prudential Regulation Authority (APRA) prudential standards on *Governance* (SPS510) and *Fit and Proper* (SPS520). We have developed a new publicly available *Fit and Proper Policy* to ensure Brighter Super's approach is fit for purpose, providing a director appointment/reappointment process that balances an appropriate mix of skills and experience with stakeholder knowledge and industry understanding. Knowledge of the application of ESG practices to investments is specifically referenced in this policy.

This year, Brighter Super also implemented the requirements of the *Financial Accountability Regime* (FAR) following its introduction into the superannuation sector. FAR imposes a strengthened responsibility and accountability framework on entities in the banking, insurance and superannuation industries, along with their directors and senior executives, and is designed to improve the risk and governance cultures of Australia's financial institutions. Within our FAR implementation, Brighter Super has allocated an accountability framework for ESG risks.

With respect to our management of ESG, central to our approach to risk management is our *Risk Management Framework*, within which the *Risk Appetite Statement* (RAS) is a crucial component. It defines the level of risk we are willing to accept in relation to ESG, ensuring alignment with our strategic goals and members' interests. The RAS is reviewed and approved by the Board annually, reinforcing our commitment to rigorous and responsive risk management practices. ESG risk is specifically contemplated in our RAS.

### Summary of sustainability oversight at Brighter Super

Role/Entity	Responsibilities
Board	The Board at Brighter Super play a crucial role, offering leadership and strategic direction, and is responsible for the approval and oversight of the Sustainable Investment Policy, Investment Governance Framework and Risk Management Framework.
Board Investment Committee	The Board Investment Committee is responsible for overseeing the management of investments where climate considerations are an integral part. Its duties include the biennial review and endorsement of the <i>Sustainable Investment Policy</i> to the Board for approval. On behalf of the Board, the Investment Committee ensures climate considerations are integrated into strategic asset allocation decisions and risk management approaches, while also actively monitoring and evaluating the effectiveness of climate-related strategies and policies. Additionally, the Committee stay informed through detailed quarterly reports on climate risks and strategies, facilitating informed decision making.
Chief Executive Officer	The Chief Executive Officer has overall accountability for Brighter Super's <i>ESG Framework and Strategy</i> , and for understanding and mitigating Brighter Super's ESG risks as appropriate.
Executive Investment Committee and Chief Investment Officer	The Executive Investment Committee, chaired by the Chief Investment Officer, assists in fulfilling Brighter Super's statutory, fiduciary, governance and regulatory responsibilities relating to the management of investments, including the climate risks associated with those investments.
Brighter Super ESG Working Group	The ESG Working Group coordinates enterprise-wide activities that are relevant to fulfilling our <i>ESG Policy and Framework</i> . The Working Group ensures consistency across our approach and communications, and shares information on emerging issues.
Head of Listed Equities and Sustainable Investment	The Head of Listed Equities and Sustainable Investment is responsible for the preparation and implementation of our <i>Sustainable Investment and Stewardship Policy</i> . This role includes ensuring that considerations related to climate change are thoroughly integrated into the Fund's investment process, aligning investment strategies with our commitment to environmental stewardship and sustainable practices.
Head of Investment Risk	The Head of Investment Risk is responsible for analysis and monitoring material financial risks within the investment portfolio, including ESG risks. This role is vital in informing the governing bodies and the investments team to allow them to understand and effectively manage these risks.

### 2.1.3. Training and development

Brighter Super ensures that our Board, management, and investment teams possess the necessary skills and competencies in climate finance and sustainable investing. This expertise underpins our informed decision-making process. To maintain and enhance these competencies, we conduct, arrange and attend regular training sessions, and provide updates on the latest developments in sustainability, climate science, policy and investment trends.

Our team also regularly attends industry conferences to share experiences and learn from domestic and international peers. We work with our asset consultant, JANA, to leverage its sustainability and climate expertise, and share learnings with our investment managers and our partners, the Australian Council of Superannuation Investors and Investor Group on Climate Change. We have also partnered with BlackCard to undertake Aboriginal and Torres Strait Islander cultural awareness training.

More broadly, across the organisation we undertake a range of learning and development to ensure that our people are conscious of their legal obligations with respect to each other, members and the broader community.

### 3.1. Sustainable investment integration across our portfolio

Brighter Super invests under the framework of our *Sustainable Investment Policy*. The framework for incorporating consideration of sustainability into our investment process is defined by four key pillars:



Must be in the best financial interests of members.



Must have negligible negative impact on investment risk and returns.



Must be genuine in both intent and outcomes.



Must not solely rely on divestment.

Brighter Super works with specialist investment managers to manage our members' superannuation monies. When selecting and reviewing these managers, we look at how they consider broad ESG issues such as:

- Environmental challenges like climate change, resource use and pollution.
- Social matters including workplace safety, labour rights and community relations.
- Corporate governance, such as board oversight, executive pay and business conduct.

These factors are assessed alongside financial performance to help us make well-rounded investment decisions that consider current performance as well as risks to that performance over the medium term.

Even though we predominantly rely on outsourced investment managers, Brighter Super has structured our mandates and policies so that we can take a more active approach in relation to ESG integration when we choose to do so.

### **CASE STUDY**

### Brighter Super's sustainability assessment in Australian Fixed Interest assets

During the reporting year, we appointed an investment manager to oversee a mandate within the Fund's Australian Fixed Interest investments. Following our internal due diligence, we assessed the investment manager's approach to sustainable investment as 'Industry Leader':

- **Governance and policy** the manager has a board-approved sustainability framework, supported by oversight committees and working groups. Policies are detailed, tailored to asset classes, and embedded in strategy-level decision making, demonstrating strong top-down commitment.
- **Investment process** ESG risks are systematically assessed at the issuer level by analysts, with support from a central sustainability team. The process combines internal research and external data, applying rigorous scrutiny to all investments, including sustainability-labelled bonds, to ensure risks and returns are evaluated beyond labels.
- **Stewardship** active engagement in fixed income markets, where influence is often limited. Analysts lead issuer dialogues and participate in collaborative investor initiatives to promote better practices.
- **Transparency** provides annual sustainability and stewardship reports, plus tailored reporting on request to support strategy-level monitoring.
- Modern slavery addressed within the broader ESG strategy. The manager publishes a modern slavery statement and engages smaller issuers to improve standards, with risk management processes extending to private markets.

### 3.1.1. Climate risk

Brighter Super recognises that climate change presents material financial risks and opportunities to our members' assets. Over time, we aim to:

- Understand how climate-related risks may affect different investments.
- Encourage better reporting and management of these risks by the managers and companies we invest in.
- Reduce the overall climate risk exposure in our investment portfolios, where data is both readily available and of sufficient quality.

Consistent with our commitment to best practice, Brighter Super is incorporating guidance from APRA's Prudential Practice Guide 229 *Climate Change Financial Risks* (CPG229) into our portfolio management and monitoring processes, and regularly reports relevant information to Brighter Super's Investment Committee.

Brighter Super considers that all climate change financial risks defined in CPG229 apply to our business or portfolio:

- **Transition risk** (disruption from adjustment to a low-emissions economy) this is a significant risk for Brighter Super given the importance of the energy industry in our member mix.
- **Physical risk** (direct damage to assets or property) this is a risk to our assets, for example Sunshine Coast Airport which is partly built on reclaimed land.
- **Liability risk** (arising from failure to consider or respond to the impacts of climate change) this is a risk for Brighter Super operations given the diversity of views on climate change across the community, and the litigious nature of some responses.

Brighter Super is committed to considering and mitigating the defined climate risks to our business and portfolio through our business plan, investment strategy and processes.

# 3.2. Climate-related reporting

Managing climate-related risks begins with a clear understanding of our exposures and opportunities. At Brighter Super, we use industry-standard data sources, climate-related insights, and our investment risk systems to develop a comprehensive view of how climate risks may affect our portfolios and members' retirement outcomes.

We aim to be transparent about our climate data, including its limitations. Before we publish any figures, we assess the quality and coverage of the data across different types of investments. This helps ensure our reporting is meaningful and reliable.

- **Listed equities** represent the largest source of climate risk in our portfolio and have been the priority for our monitoring and management efforts to date. However, we continue to expand climate coverage across asset classes, with our climate reporting now encompassing approximately 80% of our funds under management.
- **Fixed income** corporate bonds are now integrated into our emissions reporting framework, where data is available. The data and methodology for fixed income mirrors that of listed equities, so reporting fixed income was a logical extension of our previous work. However, because of complexities with data and double counting, sovereign bonds have been excluded from this reporting process.
- **Unlisted assets** (private equity, real estate, infrastructure) we are actively working with our investment managers to enhance data collection and reporting for unlisted assets. Coverage across these portfolio segments has materially improved, and we are now analysing data trends over time to enhance insights.

We remain committed to expanding our climate reporting as data quality improves across all asset classes.

### 3.2.1. Metrics

To help members understand our climate impact, Brighter Super reports on the carbon emissions linked to our investments in listed companies. Specifically, we focus on what are known as Scope 1 and Scope 2 financed emissions:

- Scope 1 emissions are those directly produced by companies we invest in like emissions from their factories
  or vehicles.
- Scope 2 emissions come from the electricity or energy those companies use to power their operations.

Although Brighter Super does not produce these emissions, they are considered part of our broader carbon footprint because we finance the companies that do produce them through our investment portfolio.

We measure emissions using tonnes of carbon dioxide equivalent per million dollars invested. The metric is a standard unit for measuring greenhouse gas emissions across different gases based on their global warming potential. This helps us understand how much carbon is linked to our investments and allows us to track changes over time as our portfolio grows or shifts.

We monitor and report the financed emissions intensity (Scope 1 and 2) of our listed equities and corporate bonds portfolios, along with the quality and coverage of the underlying emissions data. The table below presents the latest portfolio metrics as at 30 June 2025.

Asset class	Emissions intensity (tCO <sub>2</sub> e/\$M invested)	Reported	Estimated	No data
Listed Equities	29.1	88.6%	10.9%	0.5%
Corporate Bonds	17.4	83.9%	5.1%	11.0%

### 3.2.2. Methodology

Our approach to calculating carbon intensity is aligned to the Partnership for Carbon Accounting Financials (PCAF) methodology, the global greenhouse gas (GHG) accounting and reporting standard for the financial industry.

The equation below shows how we determine the financed emissions for listed equities and corporate bonds with Brighter Super's estimated carbon intensity reported in units of tonnes of CO<sub>2</sub> equivalent per \$1 million invested.

Financed emissions = 
$$\sum \frac{\text{Brighter Super ownership share}_c}{\text{Enterprise value including cash}_c} \times \text{Company emissions}_c$$

Where 'c' represents a listed company.

The financial data used in our calculations was procured from a variety of sources. Holdings were sourced from our custodian, market values and company enterprise values (including cash) were provided by FactSet, and Scope 1 and 2 company-level emissions were supplied by MSCI. MSCI's methodology involves estimating emissions for companies that do not report Scope 1 and 2 emissions by using global industry averages – a recognised approach within the PCAF Standard's hierarchy of emissions estimation methodologies.

Where possible, we used the most recent data available as at 30 June 2025. However, the timeliness of carbon data is dependent on the reporting cycles of companies and the frequency at which MSCI updates its database. The emissions data includes a mix of reported and estimated figures. Data deficiencies arise due to unreported or unavailable data, and corporate actions. Where data is not reported publicly, MSCI employs estimation models. Companies with insufficient data (market values, enterprise values or emissions) are excluded from calculations.

The 30 June 2022 baseline analysis involved the construction of a blended portfolio, which captured the future state of the combined Brighter Super and Suncorp Super portfolios, ensuring comparability to our 30 June 2024 (our first reporting year) portfolio. In doing so, the carbon emissions of some passive (i.e. indexed) portfolios were estimated using an applicable benchmark. For instance, some domestic and global portfolios were estimated via the S&P/ASX 300 Index and MSCI All Country World ex-Australia Index, respectively.

<sup>&</sup>lt;sup>^</sup> Emission scopes as defined by the *Greenhouse Gas (GHG) Protocol*.

### 3.2.3. Scenario analysis

Brighter Super understands the value of scenario analysis in identifying, assessing, and managing potential risks and opportunities associated with individual investment holdings, portfolios, and strategies affected by climate change. We also acknowledge the inherent challenges in this process, such as data limitations and evolving methodologies among providers.

Despite these challenges, we carry out climate scenario analysis monthly on our listed equities and corporate bonds using models introduced in 2023/24. Our scenarios consider a wide range of factors, such as global economic growth, population trends, energy consumption, land management, and greenhouse gas emissions. This helps us simulate how different climate futures might unfold. We base our scenarios on those developed by the Network for Greening the Financial System (NGFS), a group of central banks and financial regulators. These include:

- Orderly transitions where climate policies are introduced early and gradually strengthened.
- Disorderly transitions where delays or inconsistent policies increase the risks and costs of the transition.
- Nationally Determined Contributions (NDC) scenario where policy action is limited to current Nationally Determined Contributions, leading to increased physical risks from climate change.

One such scenario is the Divergent Net Zero scenario, which aims to achieve net-zero emissions by 2050 and limit global warming to 1.5°C, but through a disorderly and disruptive pathway. It assumes that climate action is delayed and fragmented across regions, with some countries acting early while others lag behind, resulting in a lack of global coordination.

Under this scenario, policy measures are introduced late and tightened abruptly after 2030, creating significant economic and financial shocks. Carbon prices rise sharply and unevenly across jurisdictions, reaching extremely high levels in a short period to compensate for lost time. The scenario relies on rapid and uneven deployment of low-carbon technologies, with some regions advancing quickly while others remain dependent on fossil fuels for longer.

Key assumptions include limited early cooperation, regional disparities in policy ambition, and heavy reliance on negative emissions technologies such as bioenergy, with carbon capture and storage (BECCS) and direct air capture later in the century to meet the 1.5°C target. These dynamics create high transition risks, including stranded assets in carbon-intensive sectors, sudden shifts in energy markets, and increased credit and market risk for financial institutions. While physical risks remain relatively low because the temperature goal is ultimately achieved, the economic disruption from the disorderly transition is substantial.

By regularly using these scenarios, Brighter Super is better placed to prepare for long-term changes, helping to protect members' retirement savings in a changing world.

### 3.2.4. Targets and activities

Brighter Super achieved its target, set in 2023, of reducing the carbon emissions intensity of our listed equities portfolio by 30% in June 2024. This was due to a combination of factors including:

- Implementation of the first phase of our climate risk overlay on a proportion of our listed equity assets.
- Portfolio construction and manager lineup decisions resulting in a significant reduction in exposure to high-emitting companies.
- Changing emissions profiles at some key emission-contributing companies.
- Market returns over the period.

Following the achievement of our initial target, we committed to setting more ambitious goals and refining our strategy. To continue managing climate-related risks and identifying investment opportunities, Brighter Super has adopted three new targets:

## **Target 1:** Further emissions intensity reduction in listed equities

We aim to reduce emissions intensity (Scope 1 and 2 emissions per \$1 million invested) in our listed equities portfolio by 50% by 2035, compared with the 2022 baseline. This target was set after reviewing our current progress and assessing alignment with international decarbonisation pathways, such as the International Energy Agency's Net Zero by 2050 scenario.

Our progress to date, when measured against this scenario, gives us flexibility in setting a more prudent reduction timeline. A more aggressive target could introduce additional financial risks into our investment process, so we have chosen a pathway that balances risk management with current returns.

### Target 2: Investment in renewable energy infrastructure

We plan to invest \$1 billion in renewable energy infrastructure assets by 2030, more than doubling our exposure compared with 2024 levels. This reflects our intent to capture long-term investment opportunities associated with the transition to lower-carbon energy sources. These assets can offer stable returns whilst contributing to broader climate risk mitigation.

### **CASE STUDY**

### Brighter Super commits US\$100 million to a global renewable energy strategy

Global clean energy consumption is expected to grow rapidly in the next decade and beyond, driven by the world's surging demand for electricity and decarbonisation objectives. This provides an opportunity for investors in the global renewables sector to generate strong, long-term financial returns. Brighter Super's recent investment in the Macquarie Green Energy and Climate Opportunities Fund (MGECO) allows members to participate in this opportunity and demonstrates the Fund's commitment to future proofing members' portfolios.

In March 2025, Brighter Super committed US\$100 million to MGECO, an open-ended fund that invests in large-scale renewable technologies, such as wind and solar, in Australia and overseas. It seeks to provide diversified exposure to the global renewables sector by investing across a range of geographies, technology types, and asset lifecycle stages.

Macquarie is one of the world's largest infrastructure asset managers<sup>2</sup> and has deep expertise across the global renewables landscape. Their team of energy transition specialists are managing over US\$7 billion in equity under management<sup>3</sup> in energy transition strategies and are working with around 35 portfolio companies.

### **Target 3:** Stewardship and company engagement

We are committed to engaging with companies that significantly contribute to climate risk in our portfolios. Our goal is to have 100% of identified 'priority companies' under formal climate-related engagement, supported by consistent proxy voting practices.

Our Stewardship Policy, introduced in 2024, formalises our approach to active ownership. It includes engagement with companies on climate risk and other material issues. The top nine contributors to Brighter Super's equity-financed emissions are all Australian companies, collectively responsible for over 50% of our portfolio emissions. These companies are currently under collaborative engagement through our participation in the Australian Council of Superannuation Investors (ACSI).

ACSI is our preferred stewardship partner due to its scale, influence and experience in the Australian market. Their approach focuses on companies with high climate-related financial risk from a long-term asset owner perspective. ACSI also supports proxy voting efforts, helping ensure that shareholder actions align with our risk management goals.

We recognise that the list of priority companies may change over time due to investment activity, mergers, divestments or operational changes. We will continue to monitor and adjust our engagement strategy accordingly.

### 3.2.5. Outcomes to date

Over the past financial year, the emissions linked to each million dollars we invest have continued to fall. This has been driven by the following key factors:

- Continued implementation of our climate risk strategy across part of our listed equity investments.
- Updated emissions data from some of the companies that contribute most to our overall emissions, showing that they themselves have been working on their emissions.
- Market performance over the year.

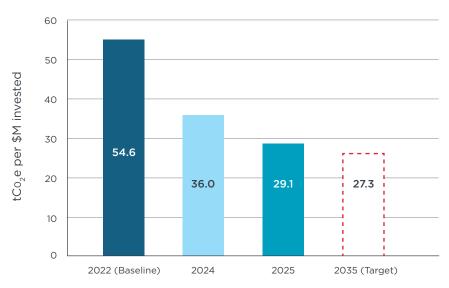
<sup>&</sup>lt;sup>2</sup> Infrastructure Investor, November 2024. Ranking of the world's largest infrastructure managers by direct investment capital raised over the past five years - www.infrastructureinvestor.com.

<sup>&</sup>lt;sup>3</sup> Equity under management (EUM) represents total funds raised in energy transition funds, including a mixture of equity deployed, equity committed to assets but not yet deployed and equity yet to be deployed.

Compared to the previous year, our emissions intensity – a measure of emissions per million dollars invested – decreased by an additional 19%, aligning with the decarbonisation rate of the Total Equities benchmark<sup>4</sup>.

Most of our reduction in emissions intensity was broad-based via updated company disclosures and market movements. That is to be expected given a global business focus on reducing exposure to climate risks of all types and supports our current emissions reduction target. Our goal moving forward is to have an emissions reduction trajectory which is broadly aligned with the market, rather than moving more quickly, which could introduce unintended performance risks for our members.

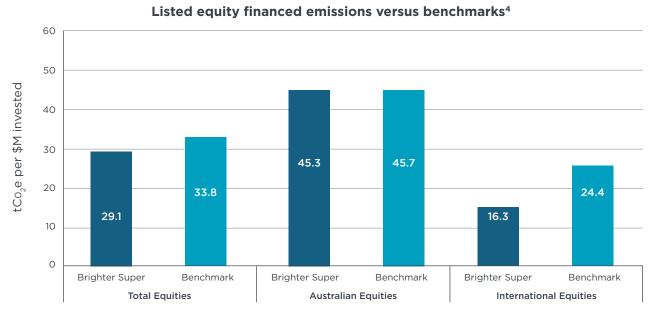
### Listed equity financed emissions per \$1 million invested for Brighter Super versus baseline and target



Source: FactSet financial data and analytics.

The chart below shows our portfolio financed emissions against the benchmarks, as a proxy for the market. While our Australian equity portfolio is broadly in line with the benchmark, our international equity portfolio is materially below benchmark at the reporting date. This is driven by the implementation of our climate risk overlay, alongside active positioning from our external managers, resulting in greater exposure to lower-emissions sectors such as financials and healthcare.

The disparity in carbon emissions intensity between Australian and international equities predominately arises from Australia's energy production and fossil fuel exports, followed by transport, agriculture and industrial processes.



Source: FactSet financial data and analytics.

<sup>&</sup>lt;sup>4</sup> Total Equities benchmark - composite of the Australian and international indices (blended based on the AUM of each asset class).

Australian Equities benchmark - S&P ASX 300 Index. International Equities benchmark - MSCI All Country World ex-Australia Index.

### Collaborating to manage risks

This year, Brighter Super deepened its partnership with ACSI, a leading organisation that helps investors engage with investee companies. We took part in over 20 meetings with key Australian companies to discuss issues that matter to long-term investors, including climate change, fair treatment of workers, and responsible governance.

In the coming year, we will adopt ACSI's *Corporate Governance Guidelines* for voting at company meetings in Australia. This reflects our commitment to using our influence to support better company practices that protect and grow our members' retirement savings.

We also helped in shaping ACSI's new engagement strategy, which focuses on fewer companies but with deeper conversations, especially in areas like:

- Climate change ensuring companies have credible plans to adapt to a warming climate.
- Biodiversity and nature encouraging better reporting and action on nature and environmental risks.
- Workforce and safety addressing wage issues, workplace safety and fair treatment.
- First Nations engagement supporting respectful and transparent relationships.
- · Human rights and supply chains promoting stronger protections and accountability.
- Board diversity and governance advocating for balanced leadership and responsible decision making.

To reflect our increasing focus in these areas, Fiona Mann (Head of Listed Equities and Sustainable Investment) joined ACSI's board, and George Kendall (Senior Analyst) joined its Member Advisory Council.

### **CASE STUDY**

### ACSI engagement with an oil and gas company on the energy transition

During the year, the investee company showed incremental progress in climate-related disclosures, shifting focus from LNG demand outlook to demonstrating energy transition resilience. New disclosures included benchmarks for gross emissions intensity, methane emissions, and lifecycle GHG intensity, alongside cost comparisons for one of the company's major projects and comparable regional LNG projects. Long-term supply contracts were also disclosed, giving investors more detailed information.

Despite these improvements, investor dissatisfaction remained, with approximately 20% voting against the sustainability committee chair at the AGM. The impending departure of this committee chair signals a desire for enhanced energy transition and stakeholder engagement expertise on the board.

ACSI has long advocated for company-specific disclosures to better assess climate resilience. The inclusion of benchmarked emissions and cost data is a positive step, enabling investors to more effectively evaluate long-term transition risks. ACSI continues to encourage enhanced transparency, clearer transition planning, and improved board-level oversight of climate strategy.

### 3.3. Other sustainability activity within our investment process

### 3.3.1. Modern slavery

Consistent with our *Modern Slavery Statement*, Brighter Super closely reviews the modern slavery submissions annually of all our external investment managers to make informed investment decisions.

Using access to international data, we undertake screening of our directly-held listed equity and corporate bond assets to identify companies deemed to be in breach of the UN Global Compact Labour Standards. We have a process where, if appropriate, we can exclude such companies from these portfolios and have applied this to ten companies at the reporting date.

### **CASE STUDY**

# **Exclusion of a Chinese energy company**

Recent reports raised concerns about forced labour in China's Xinjiang region, especially in industries linked to car manufacturing. Investigations suggested that raw material processing, such as synthetic rubber for tyres, have shifted to the region, increasing exposure to state-run labour transfer programs involving ethnic minorities.

International bodies, including the United Nations and the International Labour Organisation, have found evidence of coercive practices, such as forced relocations, surveillance, and threats of detention targeting Uyghurs and other groups. These findings highlight serious human rights risks in global supply chains connected to Xinjiang.

The company has been linked to forced labour concerns through a subsidiary which plays a major role in China's synthetic rubber production, as used in automotive tyres. The company has yet to respond to the engagement by our third-party data vendor and remains excluded from our portfolios.

### 3.3.2. Stewardship

Brighter Super believes that the use of investor rights and influence can protect and enhance overall long-term value for clients and beneficiaries. This can be achieved through better understanding of a company's corporate governance approach, their leadership, and their strategies, which can then be used to understand the risk and return potential more meaningfully.

Stewardship means being an active owner, which includes:

- Engagement with companies to understand their leadership, strategy and risk management.
- Collaborating with other investors to address broader market risks.
- Voting on company decisions to represent members' interests.

How we do it:

- Investment managers we expect our fund managers, where practical, to engage with companies and report on their stewardship activities.
- **Collaboration** we work with ACSI to amplify our voice and influence key Australian companies. ACSI is an organisation that represents the interests of Australian superannuation funds in promoting good corporate governance and responsible investment practices.
- **Proxy voting** we instruct our managers to exercise ownership rights through proxy voting at company Annual General Meetings (AGMs) to ensure members' interests are represented. Brighter Super's mandates with our listed equities managers delegates to them the exercising of voting rights as part of their overall investment responsibilities. Voting activity, particularly with respect to companies deemed material to the risk and return outcomes for our members, is monitored and discussed with managers as part of the review process.

We are currently building out our approach to voting at Australian companies, which will align more closely with our engagement activity through ACSI.

### **CASE STUDY**

# Investment manager engagement with a mining company on human rights in the energy transition

As demand for electric vehicles and renewable energy grows, so does the need for minerals like cobalt. However, parts of the cobalt supply chain carry risks related to human rights and labour conditions.

Our investment manager raised the issue with the investee company about how these risks are considered in its climate transition action plan. This included feedback from a research trip to China, where a major cobalt supplier was unable to demonstrate adequate human rights safeguards. A new engagement objective has been set around establishing how investee companies in the sector balance climate goals with responsible sourcing, giving a deeper insight into the leaders and laggards in this area.

# **Operating responsibly**

### 4.1. Healthy, happy and safe workplace

Brighter Super is proud to call Queensland home, with over 85% of our team based within the Sunshine State, working closely with our local members every day. We employ approximately 260 team members and are pleased to maintain a balanced gender ratio across the organisation. Our purpose is to build personal connections and guide members to retire confidently.

Our people are our competitive advantage. Being intentional in creating a culture that fosters innovation, enterprise thinking and commercialised risk-taking ensures that we attract, develop and retain key talent to support the sustainable growth of Brighter Super. We are continuing to mature our people strategy to strengthen engagement, build capability, embrace technology, enhance employee experience and above all retain our member focus. We appreciate that discretionary effort plays a critical role in achieving our strategic priorities and driving meaningful outcomes for our members.

The following successes from 2024/25 reflect our ongoing commitment to fostering a healthy, happy and safe workplace. After a period of considered consultation and collaboration, Brighter Super received a 97% 'yes' vote and implemented the 2024 Brighter Super Enterprise Agreement in late 2024. This facilitated a notable uplift of our employee benefits, including increased flexibility to work from home, innovative leave options, extended paid parental leave for both primary and secondary carers, expanded redundancy provisions, and a range of additional improvements.

Workplace Gender Equality Agency (WGEA) reporting for 2024/25 revealed the gender pay gap aggregate for Brighter Super subsidiaries (Brighter Super and SPSL) of 14.4%, a reduction from 2023/24 reporting and significantly lower in comparison to the Australian average of 21.8%. The gender pay gap reduction demonstrates our strong commitment to education and awareness around talent management and remuneration practices.

This year saw a strong increase in participation in our rewards and recognition program, with approximately 25% of the organisation nominated for an award during the year. This initiative has played a key role in increasing employee engagement, supporting retention, and fostering a positive and inclusive workplace culture.

We strengthened our commitment to diversity and inclusion through the introduction of continuous listening sessions, refinement of our onboarding and mandatory training. We also reaffirmed our workplace health and safety obligations through facilitating

psychosocial education sessions and company-wide employee surveys to mitigate risks, reduce absenteeism and turnover and promote a culture of openness and trust.

We streamlined and elevated our performance management processes to ensure greater visibility, efficiency, and alignment with organisational goals. This included simplifying workflows, improving feedback loops, and enhancing the overall employee experience through more transparent and supportive performance conversations.

Our concerted focus on our people and culture and significant attention to our organisational health to drive performance has been very effective. A survey of organisational health indicators undertaken by an external consultant placed Brighter Super in the top decile of surveyed companies, reinforcing our reputation as an employer of choice and a high-performing business.

### 4.1.1. Cultural evolution

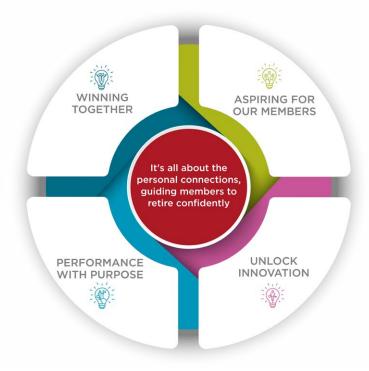
Brighter Super is committed to enhancing our culture to build engagement and retention, drive performance and productivity, strengthen team cohesion and to align with our sustainability measures.

During our first phase of integration, Brighter Super brought together three respected super funds – LGIAsuper, Energy Super and Suncorp Super – and our shared values of trust, integrity and partnership helped us come together and grow.

As Brighter Super, we have now entered a new phase where we are embracing the opportunity to evolve our purpose and values to reflect a modernised culture ready to support our strategy and member outcomes. Our business strategy aligns with our purpose – it's all about the personal connections, guiding members to retire confidently – and this ensures that we are a sustainable member-owned superannuation fund for the future.

Underpinning our purpose, our modernised values are built on our foundations of trust, integrity and partnership and are reflected in how we show up for work, how we lead, and how we support each other.

Additionally, we acknowledge the link between ESG reporting and company values as a strategic cornerstone for our business. Our values serve as guiding principles for our sustainability efforts.



Our organisational values are more than just words. They are the behaviours, attitudes and mindsets that will help us deliver on our strategy, create a lasting culture and, most importantly, continue to guide our members to retire with confidence.

### 4.2. Innovate Reconciliation Action Plan

Brighter Super launched our first Innovate Reconciliation Action Plan (RAP) in November 2024 as part of our commitment to advance reconciliation and create meaningful opportunities for Aboriginal and Torres Strait Islander people.

Since then, we have embraced the plan and made strong progress towards the goals we set in consultation with our First Nations partners.

As a fund that supports 17 First Nations councils and with many First Nations people among our members, we are deeply invested in building a more inclusive and culturally safe superannuation experience.



Reconciliation is not a journey we can take alone. Our progress has been guided and enriched by the support of partners including the First Nations Foundation, BlackCard, and artists Kylie and David Hill, who have been instrumental in helping us deepen our cultural learning. We collaborated with partners including TAL, Zurich, Australian Council of Superannuation Investors (ACSI), and Tech Mahindra to explore and align reconciliation goals and improve services for First Nations members.

The first 12 months of our RAP journey focused on learning and discovery. We remained active in the First Nations Foundation Superannuation Working Group, strengthening relationships with First Nations communities and financial counsellors to simplify identification processes, and enhance third-party verification. We participated in national initiatives such as First Nations Foundation's Financial Wellness Week, where our team travelled to remote and regional Queensland to meet members in their workplaces and communities.

Over 100 staff completed cultural awareness training with our partners at BlackCard, including deep cultural immersion for our Executive Leadership Team. We launched annual modular online training for all customer-facing staff, complemented by immersive experiences such as cultural walking tours. We celebrated Reconciliation Week and NAIDOC Week with staff and stakeholders, embedding reconciliation into our culture through leader-led acknowledgements and regular updates at all-staff meetings.

To better support vulnerable and First Nations members, we established a dedicated team in our call centre with systems in place to identify members who may need additional care. We introduced regional identification in our call centre to connect First Nations members with team members who have more experience engaging with First Nations members.

As we move into the second year of implementing our RAP, our focus continues to be on uplift and delivery. We will:

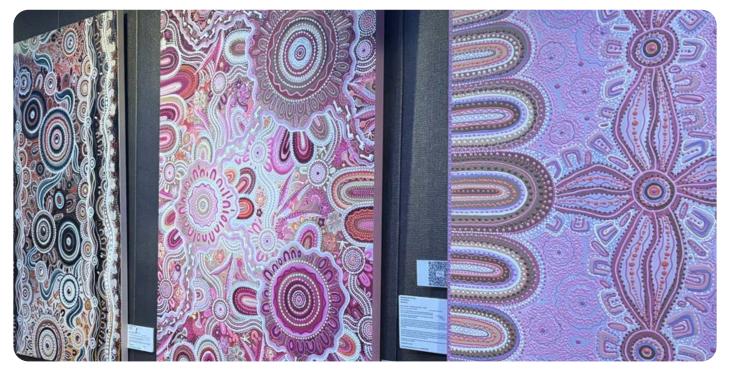
- Introduce tailored information and forms to better support First Nations members.
- Further enhance member experiences to reflect cultural needs and expectations.
- Continue our engagement with the First Nations Foundation and the national superannuation working group.
- Co-design service and learning plans with First Nations councils that meet their unique needs.

Read about Brighter Super's progress on its *Innovate Reconciliation Action Plan* on our website.

# Walking tours with BlackCard







# Acknowledging Reconciliation Week and NAIDOC Week with artists David and Kylie Hill











### 4.3 Organisational carbon emissions

Brighter Super assesses climate risks not just at the level of the investment portfolio – where our largest exposure exists – but also emissions created by the operations of our Fund. Brighter Super will seek to reduce our ownsource carbon emissions over coming years.

Brighter Super continues to uplift our understanding of our own source emissions and in FY25 we have again undertaken an analysis of our emissions with our partners Pangolin Associates.

Our analysis covered all Brighter Super activities associated with our work and our people based in four locations:

- 180 Ann Street, Brisbane, Queensland
- 123 Eagle Street, Brisbane, Queensland
- 320 Pitt Street, Sydney, New South Wales
- 266 Sturt Street, Townsville, Queensland

We also enhanced our understanding of the ways in which we work by surveying our colleagues to understand their workplace and travel to work preferences, and the contributions these make to our greenhouse gas emissions, as well as their likely emissions contribution when working from home.

At  $5,274 \text{ tCO}_2$  equivalent, our gross emissions have remained steady with what we reported in FY24 (5,292.9) and we are beginning to build a clearer understanding of our key emissions sources.

This information also provides us with a longitudinal reference point for how we act over time to reduce our carbon emissions where that is efficient and effective.

Operational boundary	Examples of inclusions	tCO₂-e
Scope 1	Direct emissions such as those resulting from fuel use or refrigerant leakage	56.6
Scope 2	Purchased electricity	255.0
Scope 3	All other indirect upstream and downstream emissions resulting from activities along the value chain	4,962.5
Scope 1 and 2 emission	s total	311.6
<b>Gross emissions total</b>		5,274.0
GHG trade total		106.9
Net emissions total		5,167.1
Energy (TJ)		3.8

Source: Pangolin Associates, Greenhouse Gas Assessment for Brighter Super FY25 in accordance with the GHG Protocol Corporate Standard - ghgprotocol.org/corporate-standard.

# 4.4 Working with stakeholders

### 4.4.1. Queensland stakeholders

Brighter Super has continued to advance our contribution to Queensland thought leadership and influencing outcomes where appropriate that support members.

In May 2025, Brighter Super implemented a new *Integrated Stakeholder Strategy* to focus our attention on ensuring we understand stakeholders' needs and expectations to continue to deliver outstanding services and returns to our members.

Our approach is to continue to work closely with the employers, associations and unions we partner with to provide our services to members where they live and work. We also seek to effectively engage with other stakeholders, including governments, competitors, associations and the media in ways that support our objectives and ensure we can deliver services and results to our members.

An example of how we engage effectively is our support of the Queensland Futures Institute (QFI). Our work here ensures that we are effectively engaged in discussions that help to guide the economic and social development of Queensland.

### 4.4.2. Regulators

Brighter Super's primary regulators are the Australian Prudential Regulatory Authority (APRA) and the Australian Securities and Investments Commission (ASIC). Brighter Super strives to have an open, proactive and productive relationship with both regulators recognising that, as the steward of our members' retirement savings, the Fund's continued success is dependent on maintaining good standing with ASIC and APRA.

# **Conclusion**

The 2024/25 financial year has been an opportunity for continued advancement of Brighter Super's progress in understanding and acting responsibly across the Fund in a way that enhances our delivery to members.

Our understanding of the impact of our investments on ESG issues has increased, with the most pleasing element being the strong engagement we are now having with our investment managers and increasingly, our portfolio companies.

Our continued focus on fund-level governance, and the consideration at the board level of ESG matters, has continued to increase. The establishment of our internal Community and Stakeholder Steering Committee has allowed us to pay more attention in particular to how we are investing in Queensland, and proven to be an effective mechanism for demonstrating our commitment to ensuring our Queensland investments consider community expectations.

As climate change continues to impact the world we live in, and community expectations increase, we are confident that Brighter Super is appropriately positioned to manage ESG risks and take advantage of ESG opportunities as a substantial and sustainable Queensland superannuation fund.



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