

The image shows the ASX Exchange Centre building in Sydney, Australia, a prominent landmark with a curved facade and a distinctive circular top section. The building is illuminated at dusk, with interior lights glowing through the windows. A dark blue diagonal graphic element is overlaid on the right side of the image, containing the title text. The ASX logo is visible in the bottom left corner.

# ASX Group Modern Slavery Statement FY2023





# Letter from CEO

At ASX, our purpose is to power a stronger economic future by enabling a fair and dynamic marketplace for all. Supporting our purpose are four values that drive our actions and commitments as a company and as a market operator. Two of those values are “we drive positive change” and “we stand up for what’s right”. It’s with these values in mind that ASX is firmly committed to addressing risks of modern slavery occurring within our business and our supply chain.

This is ASX Group’s Modern Slavery Statement for the year ending 30 June 2023 and details the progress we have made in identifying modern slavery risks in our operations and supply chain, and the actions we have taken to address those risks. Those actions included conducting modern slavery risk assessments on all new suppliers with a proposed spend above \$50,000, the inclusion of modern slavery clauses in supplier contracts, the continued implementation of mandatory training for all ASX staff, as well as the maintenance of a Supplier Code of Conduct which includes specific provisions relevant to modern slavery.

We have used the UN Guiding Principles on Business and Human Rights to help assess our potential to cause, contribute or be directly linked to modern slavery and we’ll continue to embed this framework in our business processes over the next 12 months.

Importantly, our commitment to addressing modern slavery risks evolves each year as our understanding of those risks and best practice grows. We conduct ongoing reviews of our modern slavery risk assessment processes, and seek to increase the reach of those processes where possible.

I look forward to seeing what we can collectively achieve together, not only at ASX but also in the wider Australian business community, to address the issue of modern slavery.

**HELEN LOFTHOUSE**

# Reporting entities covered by this statement

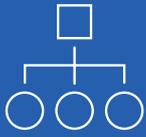
This statement relates to the reporting period commencing 1 July 2022 and ending 30 June 2023 (the FY2023 reporting period).

This Modern Slavery Statement is a joint statement made on behalf of:

Entity	Description
ASX Limited (ABN 98 008 624 691) (ASX Limited)	ASX Limited operates Australia's primary national securities exchange.
ASX Operations Pty Limited (ABN 42 004 523 782) (ASXO)	ASXO is ASX Group's primary services entity and contracting entity.
ASX Clearing Corporation Pty Limited (ABN 45 087 801 554) (ASXCC)	ASXCC operates two clearing houses as licensed facilities under the Corporations Act. As the central counterparties in their respective markets, ASX's clearing houses act as the seller to every buyer and the buyer to every seller, reducing counterparty risk and providing greater certainty and efficiency.
ASX Clear (Futures) Pty Limited (ABN 91 050 615 864) (ASXCF)	ASXCF provides central counterparty clearing of exchange-traded derivatives and over-the-counter (OTC) derivatives. Through the novation process, the CCP assumes the credit risk of all trades centrally cleared and facilitates an efficient and orderly clearing and settlement function for the market.

These entities are collectively referred to as the **ASX Group Reporting Entities** for the FY2023 reporting period, pursuant to the requirements of the Modern Slavery Act 2018 (Cth).

# ASX Group structure, operations and supply chain



## OUR STRUCTURE

ASX Limited is a publicly listed company incorporated in Australia and is the parent company of ASX Group, which comprises a number of wholly-owned subsidiary companies including each of the ASX Group Reporting Entities, and a number of other companies in which one or more ASX Group entities have a non-controlling ownership interest. The majority of ASX Group's subsidiary companies are incorporated in Australia (including each of the ASX Group Reporting Entities), however a small number of the entities that ASX Group owns are incorporated in New Zealand or the USA.

ASX Group employed an average of 1,050 full-time equivalent (FTE) employees and contractors, with 3 employees being located outside Australia.

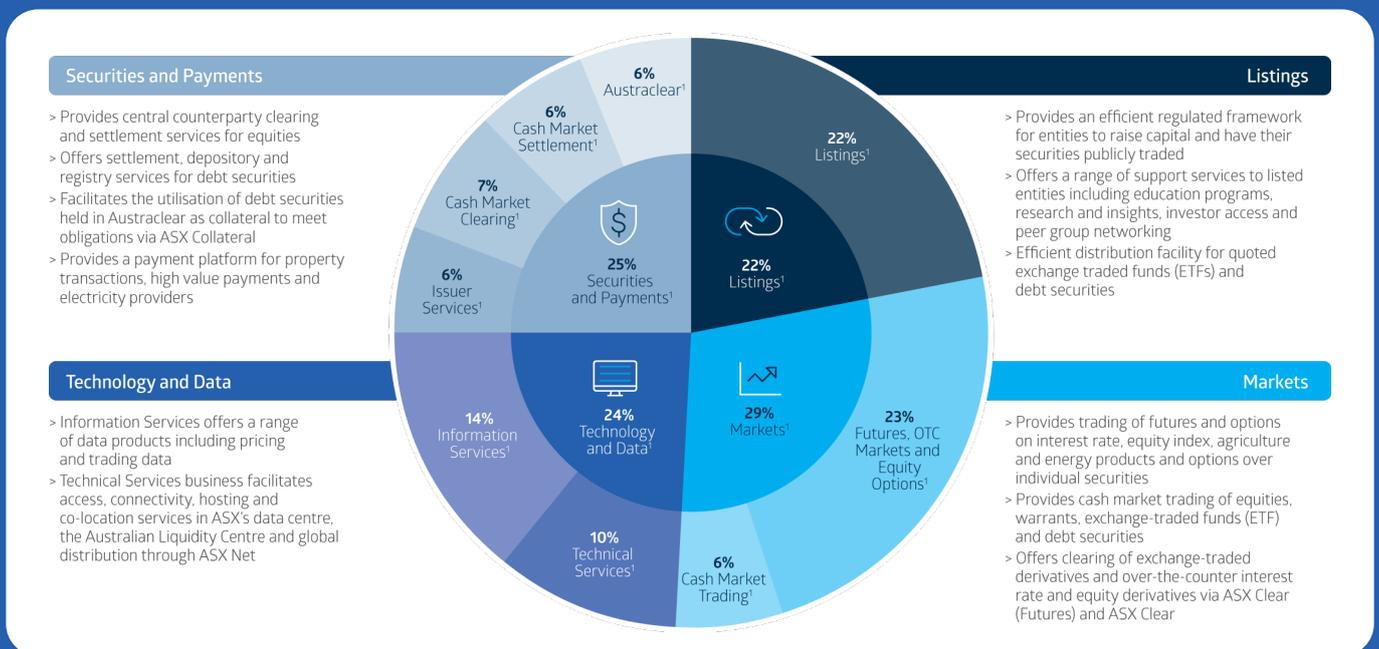
For more information about our corporate structure, please refer to our 2023 Annual Report.



## OUR OPERATIONS

ASX Group is an integrated exchange operating a significant part of the infrastructure that supports Australia's financial markets. ASX Group offers listing, trading, clearing and settlement services, technical and information services, and other post-trade services for a wide range of asset classes, including equities, fixed income, commodities and energy.

FIGURE 1: ASX VALUE CHAIN<sup>1</sup>



<sup>1</sup>Percentages in chart represent revenue allocation for FY23.

ASX operates a significant part of the infrastructure that supports Australia and New Zealand's financial markets. ASX is a multi-asset class and integrated exchange group. The Group operates markets for cash equities and derivatives, providing a full service offering across listings, trading, clearing, settlement, registry, and information and technical services.

The business is conducted through a number of regulated and non-regulated legal entities. ASX hold market licences, clearing and settlement facility licences and a benchmark administrator licence to undertake its activities.

ASX is subject to oversight by the Australian Securities and Investments Commission (ASIC) and the Reserve Bank of Australia (RBA), in addition to a number of overseas regulators.

ASX's activities and revenues are grouped into four key businesses: Listings, Markets, Technology and Data, and Securities and Payments.

In June ASX launched its new five year strategy including a new purpose, vision, strategic pillars and values. The new ASX strategy sets clear organisational goals and measures of success which will help guide, prioritise and deliver sustainable value to our stakeholders.

ASX Group operates primarily in Australia, with our head office located in Sydney. Regular operations are also undertaken by ASX Group entities out of office locations in New Zealand and the USA. In addition, ASX Group employees may briefly attend other countries from time to time as part of managing international customer activities.

More information about ASX can be found at: <https://www.asx.com.au/>

#### OUR SUPPLY CHAIN

The primary component of our supply chain includes the manufacture, delivery, installation, support and maintenance of the technology required to operate our infrastructure and provide our services. Our supply chain also includes the suppliers of the various goods and services that contribute to our general operations – these include our property agents, insurance providers, external consultants, the companies that provide our kitchen supplies and stationery, the manufacturers of ASX uniforms and apparel, and our security providers.

During the FY2023 reporting period, our global supply chain comprised approximately 600 direct suppliers having their base of operations located in a total of 18 countries, including Australia, Belgium, Canada, Switzerland, Czech Republic, Germany, France, England, Hong Kong, India, Ireland, Luxembourg, Malta, Malaysia, New Zealand, Singapore, Sweden, and the USA. ASX Group acknowledges that a number of direct suppliers to ASX Group may have manufacturing facilities in countries other than their base country of operation, including but not limited to Brazil, China and Mexico.

FIGURE 2: ASX PROCUREMENT SPEND BY COUNTRY

Country	Spend by % in FY23
Australia	81.8%
United States	9.1%
United Kingdom	3.3%
New Zealand	1.8%
Singapore	1.0%
Hong Kong	0.5%
Ireland	0.5%
Belgium	0.3%
Other <sup>1</sup>	1.7%

<sup>1</sup>denotes countries with a single supplier relationship including Canada, Czech Republic, France, Germany, India, Luxembourg, Malaysia, Malta, Sweden

Approximately 20% of ASX Group's total supplier spend during FY2023 was attributed to 27 "Tier 1" suppliers providing key goods and services to facilitate ASX Group's operations. These suppliers cover a range of industry sectors, including financial services and technology goods and services, telecommunications and risk management. ASX Group's operations require uninterrupted access to the infrastructure that services our business, therefore our core supplier relationships are often stable, long-term relationships, rather than short-term engagements.

ASX Group's supply chain is also comprised of other key direct suppliers operating in the industries of data infrastructure, external consulting, information technology, financial services (including technology), telecommunications, recruitment, insurance, energy (electricity and gas), property management, electrical installation services, and postal services.

Our supply chain also comprises the indirect suppliers that provide inputs and services to the direct suppliers of ASX Group, such as the manufacturers of the uniforms that we source from our suppliers and the cleaning services used by our external contractors.

# Our approach to protecting human rights through modern slavery risk practices

ASX Group uses the United Nations Guiding Principles on Business and Human Rights (UNGPs) to help assess our modern slavery risk factors. The UNGPs establish an internationally recognised framework that explains that companies may cause, contribute or be directly linked to adverse human rights impacts through their business activities. This “continuum of involvement” is outlined below.

**FIGURE 3: ADOPTING THE UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS**

Cause	Contribute	Directly linked
Assessing any risk that may cause modern slavery if its actions directly result in modern slavery practices.	Assessing any risk that may contribute to modern slavery if its actions significantly contribute to modern slavery including where ASX Group performs acts or omissions that facilitate or incentivise modern slavery.	Assessing any risk that may be directly linked to modern slavery through the activities of another entity through which ASX Group has a business relationship.

## POTENTIAL FOR MODERN SLAVERY RISKS IN OUR OPERATIONS

### As an employer

ASX Group employs approximately 1,050 full-time equivalent (FTE) employees and contractors and augments our workforce with various consultants and third party providers. As such, we have the potential to cause modern slavery through our employment practices. We believe the inherent risk of this occurring is extremely low given the strong control frameworks and employment processes we have in place. These include:

- The existence of a Board-approved Modern Slavery Policy, which addresses modern slavery risks in our supply chain and operations, and sets minimum standards for staff for identifying modern slavery risks (see section titled ‘Our Modern Slavery Policy’ below).
- The fact that the vast majority of ASX Group’s employees are employed in Australia, which is considered a low risk geography for modern slavery due to the existence of strong workplace and employment laws.

- Processes and controls to ensure prospective employees are engaged in a proper and lawful manner. These include pre-employment and visa checks and minimum terms and conditions that apply to all of our employees under our employment contracts.
- The communication of the existence of our available grievance mechanisms (such as our independently managed whistleblowing reporting service) to current and former employees, including contractors and temporary employees.
- The setting of clear expectations through the ASX Code of Conduct about behaviour and conduct.

### OUR MODERN SLAVERY POLICY

ASX Group launched our Modern Slavery Policy in June 2020. It sets clear expectations for the ASX Board of Directors, key executives and all employees about their responsibilities for managing modern slavery risks in our business operations and supply chain.

Key aspects of the policy include:

- Business unit management will perform its operations in a way that mitigates the risk of modern slavery in its business and supply chain. This may include reliance on organisational controls as appropriate.
- Each contract owner must, as far as practicable, include in their operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.
- ASX’s supplier policies and procedures should include specific prohibition of modern slavery.
- All new suppliers are to be subject to a risk-based due diligence assessment prior to on-boarding.
- Contract owners who manage existing vendor relationships must implement a risk-based approach to review the vendor’s modern slavery risks and disclosures.
- ASX Group has modern slavery risk and performance indicators in place and provides regular reporting to appropriate governance forums against such indicators.



## POTENTIAL FOR MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

For consistency with the approach taken by ASX Group in previous reporting periods, we have mapped our supply chain and operations and established a baseline for identifying modern slavery risks. In order to inform our assessment of modern slavery risks that may be applicable to the operations and supply chain of ASX Group (including each of the ASX Group Reporting Entities), we continued to refer to modern slavery data and resources published by non-government organisations (NGOs) and international organisations such as the International Labour Organisation and Walk Free Foundation.

Based on the reporting data contained in these resources around the prevalence of modern slavery in certain regions and industries, and having regard to the location and nature of our suppliers, we assessed that while ASX Group operates in a relatively low risk sector (being financial markets infrastructure), we have the potential to be directly linked to modern slavery through our supply chain.

The following components of our supply chain are key areas which could give rise to a risk that one or more ASX Group entities could be directly linked to modern slavery practices:

- **Geography risks** – Suppliers located in ‘high risk’ countries: Data provided by Walk Free Foundation in its [Global Slavery Index 2023](https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf)<sup>1</sup> outlines the ten countries which are considered to have the highest rates of prevalence of modern slavery across the globe. ASX Group has identified that none of our direct suppliers are from these countries. However, it is possible that some of our direct suppliers may obtain their own inputs from suppliers located in these countries, meaning that our ‘indirect suppliers’ are a key area of risk for ASX Group.

- **Category risks** – Suppliers utilising offshore manufacturing: ASX Group sources stationery, ASX-branded uniforms and apparel, corporate merchandise, technological devices and hardware from suppliers that we anticipate may use offshore manufacturers. As we do not have visibility over the locations of these offshore manufacturers, there exists a possibility that they may be located in countries reported by NGOs and international organisations to have a higher prevalence of modern slavery. In addition, the inputs and materials used by these offshore manufacturers may be sourced from suppliers located in countries with a high prevalence of modern slavery. For these reasons, suppliers using offshore manufacturers are another key risk area for ASX Group.

- **Sector risks** – Suppliers operating in high risk industries: Data provided by Walk Free Foundation in its Global Slavery Index 2023 suggests that despite the financial sector being perceived as low risk for human rights abuses, entities may unknowingly engage vulnerable workers through labour agencies in higher risk industries such as catering and cleaning services. Office cleaning services are used in each of the locations in which ASX Group has offices. ASX Group has low visibility over the supply chains of these cleaning services where such services are provided through ASX Group’s direct suppliers (such as building management). We have identified this as a key risk area for ASX Group.

ASX Group recognises the importance of monitoring and mitigating the above key risk areas to help ensure that no ASX Group entities are directly linked to modern slavery practices through ASX Group’s operations and supply chain.

<sup>1</sup> <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

# Actions taken to address the risks of modern slavery practices in our supply chain

## DUE DILIGENCE

ASX Group seeks to ensure that we only engage with suppliers that share our values about the prevention of modern slavery practices. To this end, ASX Group performs mandatory due diligence on our suppliers to assess our potential exposure to the risk of modern slavery for each supplier, and mitigate the risk of modern slavery being present in our supply chain.

During the FY2023 reporting period, the due diligence processes and controls in operation included the following:

- **Risk Assessments:**
  - ASX Group implemented a new risk assessment methodology for our supply chain, adopting a “risk-based approach” principle rather than solely relying on existing and potential suppliers to provide us with information. The revised approach is outlined in Figure 4 below and will continue to be refined based on best practice and our own learnings over time.
  - Consistent with actions taken in previous financial years, we performed risk assessments on all new suppliers (where ASX Group’s proposed spend is above \$50k or where the supplier is identified by ASX Group as being in a high risk industry) to assess the supplier’s level of modern slavery risk.
  - We utilise Bureau Van Dijk (BVD) service and tools to detect, assess and monitor risks associated with modern slavery throughout our supply chain. The risk assessment tools help ASX Group identify and verify entities to be screened for risks relating to modern slavery prior to agreeing to a contract and for the duration of a contract agreement.
  - We also continued our risk assessment and categorisation of existing suppliers in regard to modern slavery risk.
- This risk assessment process for both new and existing suppliers included:
  - > vetting supplier policies or published statements to understand the modern slavery risks in their operations and supply chains, and how they typically seek to address any identified modern slavery risks.
  - > engagement of a third party data service to provide independent scores for proposed new suppliers based on the supplier’s levels of human rights protections within its own operations and supply chains.
  - > categorisation of a supplier into a defined risk tier.
- Categorisation of a supplier into a particular risk tier triggered an associated risk management action for ASX Group, each of which are detailed against the relevant category below and outlined in Figure 4:
  - > “High Risk” (resulting in requirement for immediate engagement with supplier and review of modern slavery risk assessment within 3 months of identification of High Risk status).
  - > “Medium Risk” (resulting in requirement for review of modern slavery risk assessment within 12 months of identification of Medium Risk status).
  - > “Low Risk” (resulting in requirement for review of modern slavery risk assessment within 3 years of identification of Low Risk Status).
- We completed 121 modern slavery risk assessments in FY2023 of our base of suppliers where ASX Group’s spend was above \$50k, or where the supplier was identified as being in a high risk industry. This is in addition to the 84 risk assessments completed over the previous two financial years. In total (as of June 30 2023), ASX Group has recorded 6 high, 46 medium and 153 low risk assessments of which we engaged all high rated suppliers to seek clarification and validation of ASX’s initial assessment.

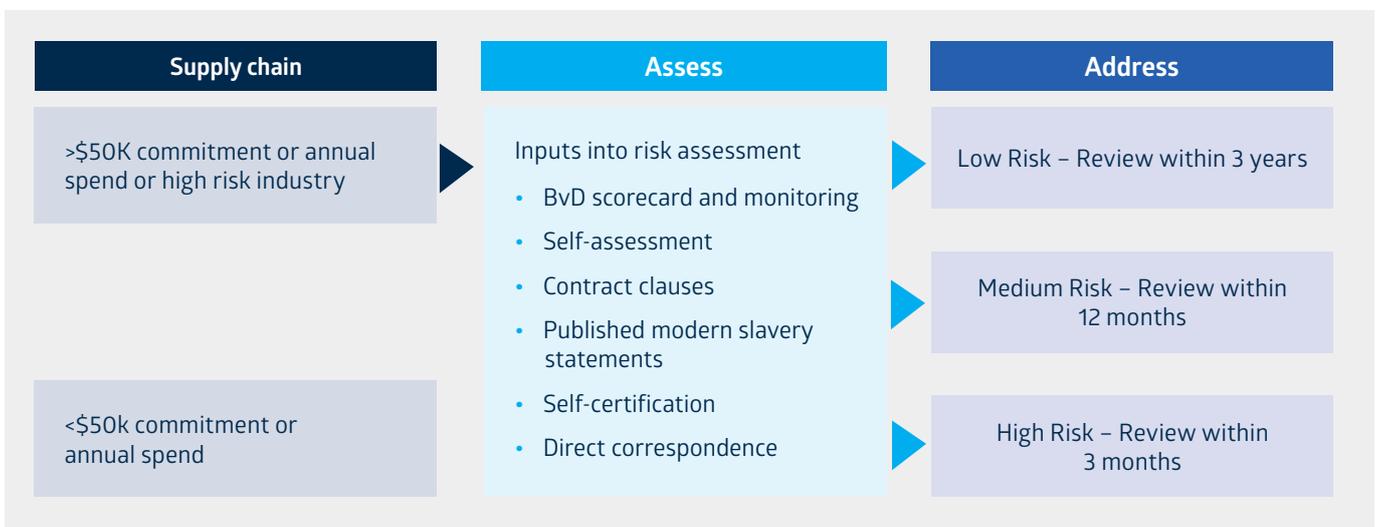
**• Supplier Dialogue**

- During FY2023 we have embedded into our procurement processes an expectation that ASX Group engage in dialogue with proposed suppliers, in order to understand the nature and levels of modern slavery risks inherent in their respective operations and supply chains, and how they typically seek to address any identified modern slavery risks.
- Dialogue commenced during FY2023 and is ongoing with suppliers identified as high risk to validate our modern slavery risk assessment and take appropriate action (see 'Remediation' section of this statement) to mitigate any modern slavery risks within the aforementioned timeframe.

**• Contractual Requirements**

- ASX Group continues to request that new suppliers incorporate ASX Group's standard modern slavery clauses in any contracts to supply ASX Group with goods or services, whereby the supplier is required to confirm that it has reviewed its own operations and supply chains and is not aware of any instances of modern slavery occurring therein.
- Where existing supplier agreements have expired during FY2023, ASX Group has requested insertion of our aforementioned modern slavery clause into any extension or renewal of the agreement (where this is not already part of the existing contract).

**FIGURE 4: ASX APPROACH TO ADDRESSING MODERN SLAVERY RISK**



**• Key policies addressing modern slavery risks**

- ASX Group has developed an internal company Modern Slavery Policy which articulates ASX Group's commitment to identifying and addressing risks of modern slavery occurring in our operations or supply chain, and provides guidance to staff with respect to the identification and assessment of any modern slavery risks.
- The Modern Slavery Policy was reviewed during the FY2023 reporting period to ensure it remains fit for purpose and relevant to our operations and supply chain. No material updates were deemed necessary.
- Various existing ASX Group policies and procedures (such as our Supplier Code of Conduct, Procurement Policy, Vendor Management Framework and RFP documentation) continued to provide additional safeguards for ASX stakeholders in respect to identifying and addressing modern slavery risks. These documents were also reviewed during the FY2023 period to ensure they remained fit for purpose and relevant to our operations and supply chain.
- ASX Group's internal Whistleblower Protection Policy provides an avenue for all eligible whistleblowers to identify and address modern slavery risks by raising concerns at ASX Group about misconduct or an improper state of affairs or circumstances, including matters concerning modern slavery.



**FIGURE 5: MODERN SLAVERY POLICY AND RELATED POLICIES**

Policy	Description	How this supports mitigation of modern slavery risk
Modern Slavery Policy	Addresses modern slavery risks within the supply chain and business operations and sets minimum standards for staff with respect to the identification of modern slavery risks.	Supports ASX's expectation that contracts with third parties should contain specific clauses relating to modern slavery, and requires accountable employees to conduct modern slavery risk assessments where certain criteria are met.
Supplier Code of Conduct	Sets ASX's expectations on how suppliers act in relation to corporate governance and ethics, workplace health and safety, environmental practices, employment practices, risk management and diversity.	Supports ASX's expectation that it should only contract with suppliers with credible and evidenced commitments to practices that minimise instances or risks of modern slavery.
Procurement Policy	Policy that seeks to facilitate timely, efficient and economic procurement, within the guidelines of best business practices. It applies to the procurement of goods and/or services regardless of size, type of spend, term, value and complexity.	Includes provisions regarding business ethics, supplier vetting as well as robust risk management requirements.
Vendor Management Framework	Sets the framework for the effective procurement practices and management of suppliers across the Group.	Includes specific processes for the identification and management of modern slavery risks among our suppliers.
Whistleblower Protection Policy	The Whistleblower Protection Policy provides information to assist staff to make disclosures and sets out how ASX will protect them from any form of retaliation or victimisation when they make a legitimate whistleblowing disclosure.	Supports people to raise concerns about misconduct or an improper state of affairs or circumstances, including matters concerning modern slavery.
Code of Conduct	Underpinned by the ASX values. The Code of Conduct applies to all directors, employees and contractors.	It sets the standards for how we work at ASX and outlines the importance of our corporate values to anyone dealing with ASX.
Anti-bribery and Corruption Policy	This policy is critical to ASX's delivery of our goal of enduring trust, integrity and resilience, and outlines ASX's requirements for the management of gifts and benefits.	Supports employees to adhere to practices that promote ethical business behaviours and practices.

- **Training and awareness**

- ASX Group continues to mandate annual Modern Slavery Risk Awareness training for all ASX Group staff.
- All vendor management staff at ASX Group were required to complete a training course titled "Identifying and Assessing Modern Slavery Risks" during FY2023.
- We publicise our values with respect to modern slavery to those outside ASX Group through publishing our Supplier Code of Conduct, Modern Slavery Policy and annual Modern Slavery Statement on the ASX website.

## REMEDIATION

ASX Group recognises the importance of appropriately addressing situations where it is found that one or more ASX Group entities have caused or contributed to modern slavery. To this end, during the FY2023 reporting period we maintained a robust remediation framework, which is captured in our Modern Slavery Policy, and bolstered by existing ASX Group policies such as our Supplier Code of Conduct and Whistleblower Protection Policy.

Our framework requires that where ASX Group becomes aware that any one or more of our direct suppliers is causing or contributing to modern slavery in their operations or supply chains, ASX Group will engage directly with that supplier to:

- Investigate the circumstances surrounding the reported occurrence.
- Develop and agree an appropriate remediation action plan with that supplier.

Remediation action plans will primarily focus on the prevention of any recurrences of the relevant supplier's actions that have been found to cause or contribute to instances of modern slavery. ASX Group recognises that the circumstances surrounding reported instances of modern slavery may vary greatly, and so remediation action plans will be developed on a case-by-case basis having regard to the circumstances of the reported occurrence and of the relevant direct supplier.

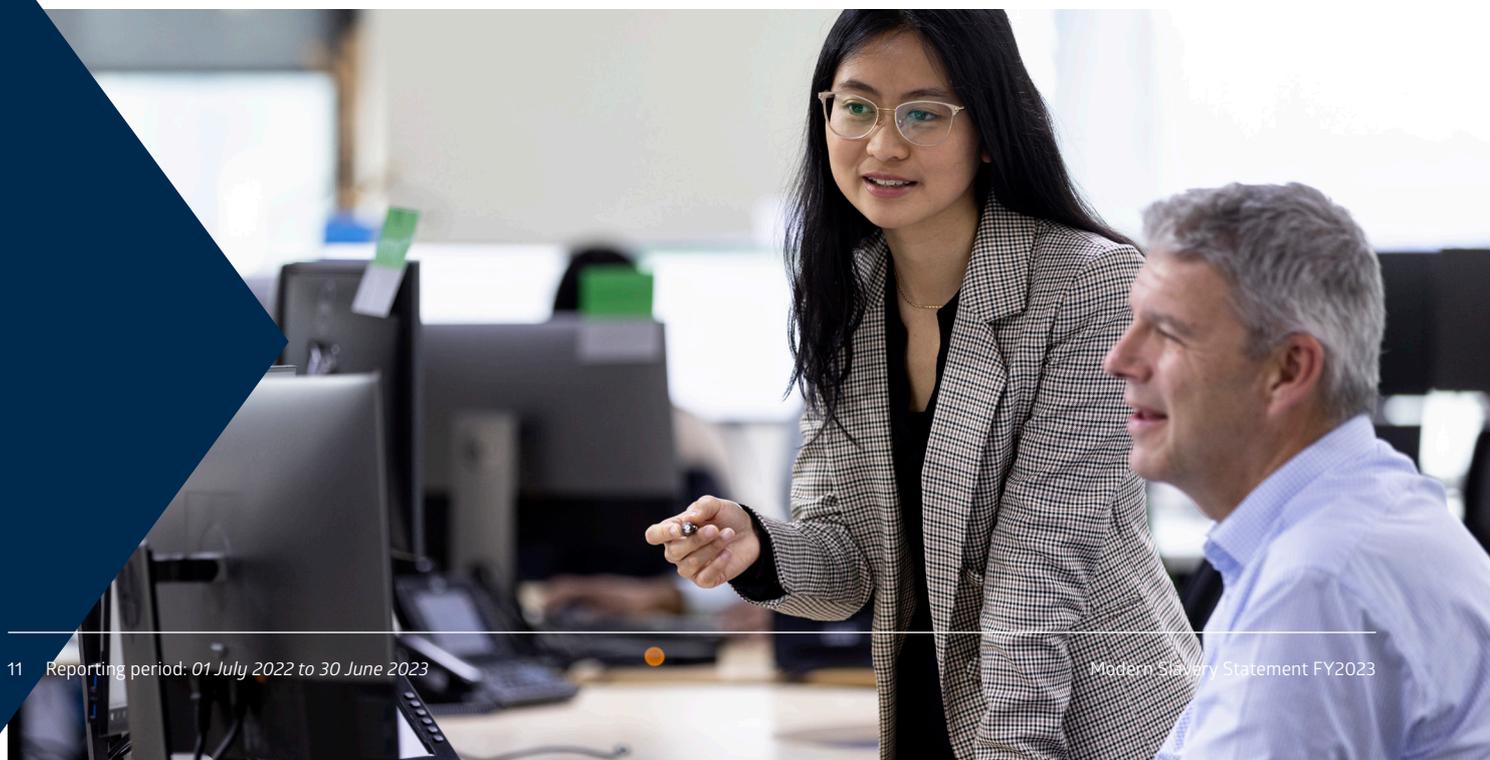
Where a direct supplier reports an incident or in ASX Group's view, any subsequent supplier risk assessments demonstrate the existence of an unacceptable risk to one or more of ASX Group's policies and procedures due to the supplier's direct or indirect involvement in modern slavery, and the supplier does not agree to work with ASX Group to implement an effective and meaningful remediation action plan, ASX Group will seek to take further action, which may include termination of the supplier relationship where necessary and appropriate.

## CONTRACT TERMS AND CONDITIONS

During the previous reporting periods we introduced a new clause into the standard form supplier agreement. This clause requires the relevant supplier to provide a warranty to ASX Group that they themselves do not engage in modern slavery practices. Suppliers are required to report on their due diligence in their own operations and suppliers within the last 12 month period, describing any identified risks and what they have addressed, and to provide satisfactory evidence that there are no instances of modern slavery in their supply chains as of the date of the agreement.

The clause also requires that suppliers undertake to provide ASX Group with an updated certification of these matters on an annual basis, and to notify ASX Group within five business days in the event that they become aware of any instances of modern slavery occurring in their operations or supply chains. During the FY2023 reporting period we have continued to roll out these amended standard form supplier agreements for new suppliers to ASX Group and existing suppliers upon contract renewal cycles.

This practice is standard procedure as part of ASX Group policy to manage modern slavery risks.



# Effectiveness of actions taken

ASX Group recognises the importance of regularly assessing the effectiveness of the actions we are taking to manage modern slavery risks in our operations and supply chain, and the need for review of the way we measure the impacts of these actions.

Below are some of the key data points that highlight the effectiveness of ASX's actions to manage modern slavery risks over the FY2023 financial year.

## TRAINING AND AWARENESS

Training programs (eligible staff completion rate)	FY23	FY22
Modern slavery module	97.7%	94.0%
Code of conduct	97.8%	94.8%
Modern slavery vendor management	100%	N/A

## COMPLETION OF MODERN SLAVERY RISK ASSESSMENTS

	FY23	FY22
Total of completed assessments	121	84 <sup>1</sup>

<sup>1</sup>Cumulative total of Risk Assessments completed during FY2021 and FY2022.

The effectiveness of our modern slavery focus is enabled by ongoing actions within our business, which includes the following:

- Conducting a regular review of our Modern Slavery Policy to ensure it remains fit for purpose and relevant to our operations and supply chain.
- Capturing and recording all identified breaches of ASX Group's Modern Slavery Policy (as well as identified breaches of any other ASX Group policies and procedures relating to modern slavery) in ASX Group's existing breach register.
- Maintaining a framework within our existing enterprise compliance processes through which modern slavery related risks and concerns (as well as breaches) may be escalated to ASX Group's Risk Committee and reported to relevant ASX Group board committees as necessary.
- Defining and measuring Key Risk Indicators related to completion of modern slavery assessments for new suppliers and current suppliers, and metrics associated with periodic review cycles and remediation of unacceptable findings or risk ratings to minimise any potential business continuity impact, consistent with our Modern Slavery Policy.





# ASX

OUR  
HISTORY

## Governance

Formal governance of modern slavery risks occurs through the ASX Limited Board who approve the annual Modern Slavery Statement. Further governance practices are in place that include:

- An internal reporting facility to capture and record all identified breaches of ASX Group's modern slavery policy (as well as identified breaches of any other ASX Group policies relating to modern slavery) in ASX Group's existing risk register (note: no breaches were reported for the FY2023 reporting period).
- Escalation processes for modern slavery-related risks and concerns (as well as breaches) to ASX Group's risk committee and relevant ASX Group Board committees as necessary.
- Definition and measurement of Key Risk Indicators (KRI's) related to completion of modern slavery assessments for new suppliers and current suppliers, and metrics associated with periodic review cycles and remediation of unacceptable findings or risk ratings and mitigation efforts to minimise any potential business continuity impact, consistent with our modern slavery policy. These KRI's are reported on a monthly basis.

## Consultation

This statement was developed by the ASX Group Reporting Entities in consultation with each of the wholly-owned subsidiaries of the ASX group of entities. It should be noted that all ASX Group entities are subject to ASX Group policies, procedures and systems, and are party to group-wide information and resource-sharing arrangements. Accordingly, the information (including supplier information) detailed in this statement is applicable to all ASX Group entities.

# Future actions on modern slavery

We are committed to further improving our response to modern slavery risks in our operations and supply chain. In our next reporting period we will look to continue expanding our response as outlined below:

Theme	FY2024 Priorities
Assessing effectiveness	Review and improve the way in which the ASX Group measures and reports the effectiveness of our actions to mitigate modern slavery risks.
Strengthening governance and reporting	Include modern slavery as an ongoing area of focus across the ASX Group in a revised Sustainability Framework.
	Establish a Sustainability Working Group to co-ordinate and oversee ASX's improvement commitments and annual Modern Slavery Statement.
	Better align ASX's Modern Slavery Statement to the UN Guiding Principles for Business and Human Rights to provide a stronger understanding and disclosure of modern slavery risks.
Managing risks	Increase the number of existing suppliers assessed for risks of modern slavery to 100% of suppliers with greater than \$50K spend.
	Undertake further risk assessments of cleaning services, which was identified as a key area of risk for ASX Group earlier in this statement.
	Increase the number of supplier contracts with modern slavery clauses included as part of ASX Group's standard contract renewal process.
	Leverage the UN Principles for Business and Human Rights to review modern slavery risks and potential mitigants across the broader ASX Group value chain for disclosure in future statements.
	Update our Vendor Management Framework to incorporate modern slavery risk assessment processes when considering new suppliers or renewing existing ones.
	Incorporate modern slavery risks into relevant risk profiles and registers with associated controls subject to the annual testing process.

This statement was approved by the Boards of directors of each of the ASX Group Reporting Entities on or about 15 November, 2023.

Signed for and on behalf of the  
Board of ASX Limited:



**HELEN LOFTHOUSE**  
Director, ASX Limited

Signed for and on behalf of the Board of  
ASX Operations Pty Limited:



**HELEN LOFTHOUSE**  
Director, ASX Operations Pty Limited

Signed for and on behalf of the  
Board of ASX Clearing Corporation Pty Limited:



**HELEN LOFTHOUSE**  
Director, ASX Clearing Corporation Pty Limited

Signed for and on behalf of the  
Board of ASX Clear (Futures) Pty Limited:



**HELEN LOFTHOUSE**  
Director, ASX Clear (Futures) Pty Limited

# Modern Slavery Act 2018 Mandatory Criteria

Australian modern slavery act mandatory reporting criteria	Reference in this statement
Identify the reporting entity.	Pages 3-5
Describe the reporting entity's structure, operations and supply chains.	
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 6-7
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Pages 8-11
Describe how the reporting entity assesses the effectiveness of such actions.	Page 12
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Page 13
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 14

## Further Information

ASX Customer Service Centre  
Mon-Fri 8.30am – 6.00pm (AEST)  
excluding public holidays

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