

MODERN SLAVERY STATEMENT 2020

CERTAINTY | INGENUITY | ADVANTAGE

Computershare

This statement outlines the actions taken by Computershare Limited (Computershare) and its related entities to identify and mitigate the risks of modern slavery in our businesses and supply chains, during the year ending 30 June 2020.

This statement has been prepared to comply with the requirements of the Australian Modern Slavery Act 2018 (Act). It is a joint statement that applies to all Computershare reporting entities within the scope of the Act, as identified in the Appendix to this statement. This is our first statement, which outlines our commitment to advancing human rights along with the steps we have taken to identify and reduce the risk of modern slavery in our business and supply chains.

Our business

Computershare is a global market leader in transfer agency and share registration, employee equity plans, mortgage servicing, proxy solicitation and stakeholder communications. We also specialise in corporate trust, bankruptcy, class action and a range of other diversified financial and governance services.

Founded in 1978, Computershare is renowned for its expertise in high integrity data management, high volume transaction processing and reconciliations, payments and stakeholder engagement. Many of the world's leading organisations use us to streamline and maximise the value of relationships with their investors, employees, creditors and customers.

Computershare is represented in all major financial markets and has over 12,000 employees worldwide in 21 countries.

For internal reporting and risk management purpose, Computershare's operating businesses are structured across the following areas.

- › Issuer Services: register maintenance, corporate actions, stakeholder relationship management, corporate governance and related services.
- › Mortgage Services and Property Rental Services: mortgage servicing and related activities, together with tenancy bond protection services in the UK.
- › Employee Share Plans and Voucher Services: provision of administration and related services for employee share and option plans, together with childcare voucher administration in the UK.
- › Business Services: services supporting for bankruptcy administration, class actions and corporate trust administration.

- › Communication Services and Utilities: document composition and printing, intelligent mailing, inbound process automation, scanning and electronic delivery, and utilities administration.
- › Technology Services: provision of software specialising in share registry and financial services.

These operating businesses are supported by corporate and shared service functions, including finance, risk and compliance, human resources, internal audit and legal. Our business is mainly office based, with some print and mail and warehouse facilities supporting our communication services business.

Our commitment

Computershare is committed to ensuring that modern slavery plays no part in the services we provide or in the supply chains we rely on to render those services.

Our Global Human Rights Policy reflects our commitment to act ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls across our business and supply chains in support of these commitments.

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all our suppliers and we expect that they hold their own suppliers to the same high standards.

Governance framework

Our company values of Certainty, Ingenuity and Advantage, supported by our 'Being Purple' ways of working, guide our staff in how they should act and conduct themselves. We have redeveloped our global learning modules to embed our Being Purple ways of working and promote the right behaviours from our staff.

We have in place several policies to help guide our employees, including:

- › Code of Conduct
- › Global Human Rights Policy
- › Diversity and Inclusion Policy
- › Whistleblower Policy
- › Anti-Bribery and Corruption Policy
- › Anti-Money Laundering and Terrorist Financing Policy

In addition, our global compliance training program covers obligations under our group policies on issues such as health, safety, wellbeing and environment, discrimination and bullying, accessibility, diversity and inclusion, human rights, anti-bribery and anti-corruption measures, and privacy.

We monitor, report and manage mandatory training completion rates, as part of our training governance framework. Employees who fail to complete mandatory compliance training without a valid reason may face disciplinary action.

Computershare has adopted a risk-based approach to assessing and managing modern slavery risk. We established a working group to review our business and supply chain activities, and to coordinate the implementation of changes needed to comply with Modern Slavery legislation in Australia and in other jurisdictions in which Computershare operates. This working group includes representatives from Procurement, Risk and Compliance, Legal, and business line management. The group is responsible for implementing appropriate practices to manage and mitigate potential modern slavery risks across our businesses, operations and wider supply chains.

Our position

As a provider of services in financial markets, Computershare has assessed the risk of modern slavery within our direct business operations as low. However, we recognise that we can be indirectly exposed to these risks, for example through our supply chain. Further detail on Computershare's approach to addressing modern slavery risk in its supply chain is provided below.

In our assessment of Computershare's risks in relation to Modern slavery, we have identified the following procurement categories that may have a higher risk of Modern slavery:

- › Facilities service providers (e.g. cleaning and premises maintenance)
- › Information technology infrastructure and hardware
- › Paper suppliers (e.g. to our global print and mail business)
- › Outsourcing suppliers (with focus on outsourced resource suppliers operating from a lower-cost location, e.g. India)

In addition, we have also analysed country risk associated with our main business locations (and those of key suppliers), and we currently consider, based on information sourced via the Global Slavery Index, that the higher-risk locations to be:

- › South Africa
- › China
- › India
- › The Philippines

Having regard to these risk-based assessments, we have identified the suppliers who are within the higher risk procurement categories and have also identified key suppliers within the higher risk locations. We have also implemented a program where we actively seek confirmation from these suppliers that they conform to a Human Rights Policy (as required by laws and regulations in their jurisdiction), or alternatively, Computershare's Human Rights Policy.

So far, we have reviewed around 300 suppliers globally, of which approximately 100 operate in higher-risk locations and/or in a higher risk procurement category, as listed above. Over two-thirds of our supply chain have now been reviewed; all of these suppliers either have an appropriate public stated position on Human Rights and Modern Slavery or have confirmed they have a Human Rights and Modern Slavery Policy in place.

We also conduct regular searches of global news sources to ensure we are aware of any reports of human rights violations committed by our suppliers.

In the past year, we have also broadened and deepened our efforts to understand and manage modern slavery risk in our organisation. We have updated our regulatory learning modules include definitions of Human Rights risks and our legal and regulatory obligations to protect the rights and wellbeing of all Computershare staff worldwide.

In addition, we have embedded our 'Being Purple' ways of working into all regulatory learning modules. These ways of working make it clear to all employees how we expect them to carry out their role and give clear guidance on acceptable behaviour and working practices. We have also piloted discussions on modern slavery risk in management meetings to broaden awareness within the business.

Future commitments

Over the next year, our focus will be on continuing to develop the maturity of our supplier due diligence program within our risk management framework. This will include the development of an additional due diligence process for new suppliers to undertake an assessment of their human rights and modern slavery compliance at the time of on-boarding. We will also be enhancing our employee training so that employees are better aware of the appropriate company policies in relation to slavery and human trafficking and understand that they have a responsibility to identify any potential breaches of those policies.

This statement has been approved by the Board of Computershare Limited.

A handwritten signature in black ink, appearing to read 'Stuart Irving', with a stylized flourish at the end.

Stuart Irving
Chief Executive Officer
30 November 2020

Appendix

This statement applies to the following Computershare Group reporting entities for the purposes of the Act and has been approved by the Boards of each of these entities:

Computershare Investor Services Pty Limited

Computershare Communication Services Pty Limited

Registrars Holdings Pty Limited

CDS International Pty Limited

ACN 080 903 957 Pty Ltd

ACN 081 035 752 Pty Ltd

