

Modern Slavery Act 2018 (Commonwealth of Australia)

Trend Micro Australia Pty. Ltd.

This statement covers the financial year ending 31 December 2022.

This statement is made by Trend Micro Australia Pty Ltd (ABN 70 077 055 817) pursuant to the Modern Slavery Act.

We do not own or control any other entities.

Structure

Trend Micro Australia is a subsidiary in a group of companies and does not control other entities. The ultimate parent of Trend Micro Australia is a listed Japanese corporation, Trend Micro Incorporated, a global leader in cybersecurity solutions. The global group of Trend Micro has over 7000 employees in 65 countries utilising the world's most advanced global threat research and intelligence.

Operations

Trend Micro Australia supplies cybersecurity products and services for hybrid cloud, endpoint and network security solutions and automated solutions for secure data sharing. Find out more at: www.trendmicro.com.au

We primarily supply software and software related services to our customers. The software is developed by the global group of Trend Micro with contributions from the personnel of Trend Micro Australia.

Supply chains

Trend Micro Australia collaborates with channel partners to fulfil product and service distribution and delivery. We rely on multiple third party suppliers and outsourcing arrangements for the supply of goods and services.

Risk assessment

We undertook risk assessments of modern slavery risks in our operations and supply chains over the reporting period to consider if we are directly or indirectly linked to modern slavery practices.

We use a number of factors to assess the potential risk of modern slavery in our supply chains, including geographic risks from where we source materials, the



products and services that we source, the sectors that we operate in and the supply chain model involved.

Due to the nature of its business, Trend Micro believes that it is at a low risk of modern slavery in its business and supply chains.

During our reporting period we have reviewed supplier engagement processes and principles. We have begun a process of requiring key suppliers to acknowledge compliance with the Modern Slavery Act and to support Trend Micro's compliance initiatives.

Trend Micro Australia is not aware of any conduct in its supply chains that would permit modern slavery. The full extent of slavery risks that exist in all supply chains and in all the supply chains of our suppliers is being investigated and will continue to be investigated over time.

Policies

During our reporting period we have examined and where necessary revised and updated our internal policies. Trend Micro Australia is subject to a Code of Conduct.

The following is an extract from the current Code of Conduct for Trend Micro employees published in January 2023:

XXII. Human Rights Modern slavery is a crime and a violation of fundamental human rights and encompasses slavery, servitude, human trafficking and forced labor, all of which have in common one person depriving another of their liberty in order to exploit them for personal or commercial gain. The Company has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, contractors, external consultants, third party representatives and business partners.

We meticulously comply with all Australian laws including those relating to employment and the engagement of third party contractors. We have in place a robust recruitment process which clearly outlines the ethical stance that we take in relation to employee intake and treatment.



The Board of Trend Micro Australia and senior management are aware of the Modern Slavery obligations.

We routinely respond to requests and questionnaires from customers concerning modern slavery practices. These requests and questionnaires require an internal examination of the risks of such practices and thereby focus our attention and resources on compliance with the requirements of the Modern Slavery Act.

Next steps

We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by monitoring our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

We will maintain a zero-tolerance policy towards slavery.

Trend Micro Australia will actively apply the Modern Slavery Act.

This statement was approved by the Board of Directors of Trend Micro Australia.

Signed for and on behalf of Trend Micro Australia by:

30th June 2023

Shirley Ng, Director on [insert date]