

# MODERN SLAVERY STATEMENT 2022

CERTAINTY | INGENUITY | ADVANTAGE

 **Computershare**

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# MESSAGE FROM THE CEO



Computershare is committed to doing the right thing and supporting our employees, clients, and communities, which is the foundation of our environmental, social and governance (ESG) approach.

We have identified modern slavery as a potential risk and addressing it is an important part of our ESG strategy. Taking action to address modern slavery risks is not just the right thing to do; it is imperative for business success. We remain committed to ensuring that modern slavery has no part in the services we provide or in the supply chains we rely on to provide those services, and to being transparent in how we manage modern slavery risks.

This is Computershare's third Modern Slavery Statement, which outlines the progress we have made to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain. We believe our business has an important role to play in upholding human rights, and we welcome legislation and other initiatives that work to protect the world's most vulnerable people.

We consider our 'Being Purple' ways of working, particularly our commitment to 'doing the right thing', to be a solid platform for our group processes and procedures. All our employees, from new starters to senior managers, are trained and regularly communicated with about our expectation that they should prioritise being honest and ethical in our business practices. This supports and furthers our commitment to human rights protection and our determination to do our part in eliminating modern slavery in all its forms.

Our Global Human Rights Policy reflects our commitment to act ethically and with integrity in all business dealings and relationships. We want to be transparent in the approach we are taking in tackling modern slavery throughout our supply chains, and we are implementing and enforcing effective systems and controls across our organisation and supply chains in support of these commitments.

Our goals in supporting human rights and preventing modern slavery include the following:

- > Conducting our business in a manner that respects the rights and dignity of all people and complies with all legal requirements
- > Prohibiting the use of child labour, forced or compulsory labour or other forms of modern slavery in any of our operations
- > Training and directing our staff to fulfil our commitments to human rights protection

We expect our suppliers to do business in an ethical manner and to share the same commitments as we do in supporting human rights, including the elimination of modern slavery in their organisation and supply chain.

In the 2023 reporting period Computershare will continue to build on the achievements set out in this report - both within our organisation and through our working relationships with our suppliers.

**Stuart Irving,**  
Chief Executive Officer

# ABOUT OUR STATEMENT

This Modern Slavery Statement has been prepared by Computershare Limited on behalf of itself and its controlled entities to comply with the requirements of the *Australian Modern Slavery Act 2018* and, where applicable, the *UK Modern Slavery Act 2015* and applies to the reporting year ended on 30 June 2022. It has been approved by the Board of Computershare Limited on 14 December 2022, by each Australian Reporting Entity<sup>1</sup> on 15 December 2022 and each UK Reporting Entity<sup>2</sup> on 9 December 2022. The board of each Australian Reporting Entity and UK Reporting Entity was consulted with and given an opportunity to consider and comment on the Statement prior to publication.

The Statement was prepared in consultation with Computershare's controlled entities by establishing a globally coordinated cross-functional working group that comprised senior management and personnel in areas such as Procurement, People, Legal, Risk and Compliance, and Corporate Communications. This Statement is made in accordance with (i) section s14 of the *Australian Modern Slavery Act 2018* (Cth) and also represents the Australian Reporting Entities' Statement on modern slavery for the financial year ended 30 June 2021; and (ii) section 54 *UK Modern Slavery Act 2015* and also represents the UK Reporting Entities' Statement on modern slavery for the period ended 30 June 2021. A complete list of the controlled entities to which this Statement relates is set out in Computershare's [FY22 Annual Report](#).

<sup>1</sup> 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 and ACN 081 035 752 Pty Ltd

<sup>2</sup> Computershare Investor Services plc, Computershare Mortgage Services Limited, Homeloan Management Limited and Topaz Finance Limited

# OUR ORGANISATION AND SUPPLY CHAIN

## COMPUTERSHARE OFFICE LOCATIONS AND KEY STATS



Issuer Services	Employee Share Plans	Corporate Trust	Mortgage Services	Business Services	Communication Services
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<p>PRESENCE IN <b>21</b> COUNTRIES</p>	<p><b>25,000+</b> CLIENTS</p>	<p><b>~16,000</b> PEOPLE</p>	<p><b>A\$14BN</b> MARKET CAPITALISATION</p>
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The Computershare group 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, and class action services, as well as 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 16,000 employees worldwide in over 20 countries.

Note: Stats at 30 June 2022

## WHERE WE PROVIDE SERVICES BY BUSINESS LINE - OVERVIEW

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

	Australia	Canada	Channel Islands	China	Denmark	France	Germany	Hong Kong	Ireland	Italy	Netherlands	Norway	New Zealand	Philippines	Poland	South Africa	Spain	Sweden	Switzerland	UK	USA	
<b>Issuer Services</b> 3,906 employees	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓
<b>Communication Services</b> 819 employees	✓	✓		✓	✓		✓	✓	✓				✓								✓	✓
<b>Employee Share Plans</b> 1,008 employees	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓
<b>Business Services</b> (includes Corporate Trust in Canada) 478 employees		✓									✓										✓	✓
<b>Mortgage Services and Property Rental Services</b> 2,721 employees									✓												✓	✓
<b>Computershare Corporate Trust</b> 2,376 employees																						✓

### ISSUER SERVICES

Register maintenance, corporate actions, stakeholder relationship management, corporate governance and related services

### COMMUNICATION SERVICES

Document composition and printing, intelligent mailing, inbound process automation, scanning and electronic delivery, and utilities administration

### EMPLOYEE SHARE PLANS

Provision of administration and related services for employee share and option plans, together with childcare voucher administration in the UK

### BUSINESS SERVICES

Services supporting bankruptcy administration, class actions and Canadian corporate trust administration

### MORTGAGE SERVICES AND PROPERTY RENTAL SERVICES

Mortgage servicing and related activities, together with tenancy bond protection services in the UK

### COMPUTERSHARE CORPORATE TRUST

Trust and agency services in connection with the administration of debt securities in the US

Note: Stats at 30 June 2022, including direct employees only and excluding Corporate/Shared Services

These operating businesses are supported by corporate and shared service functions, including Technology Services, Finance, Risk and Compliance, People, Internal Audit and Legal. Our business is office-based but with flexibility for hybrid and remote working where appropriate. We also have some print and mail and warehouse facilities supporting our Communication Services and Corporate Trust businesses.

We have a diverse supply chain where goods and services are sourced by our procurement teams across seven main categories: Print, mail and postage, Special services, Technology, Financial market and professional services, Managed and offshore services, Facilities related services and Talent acquisition services.

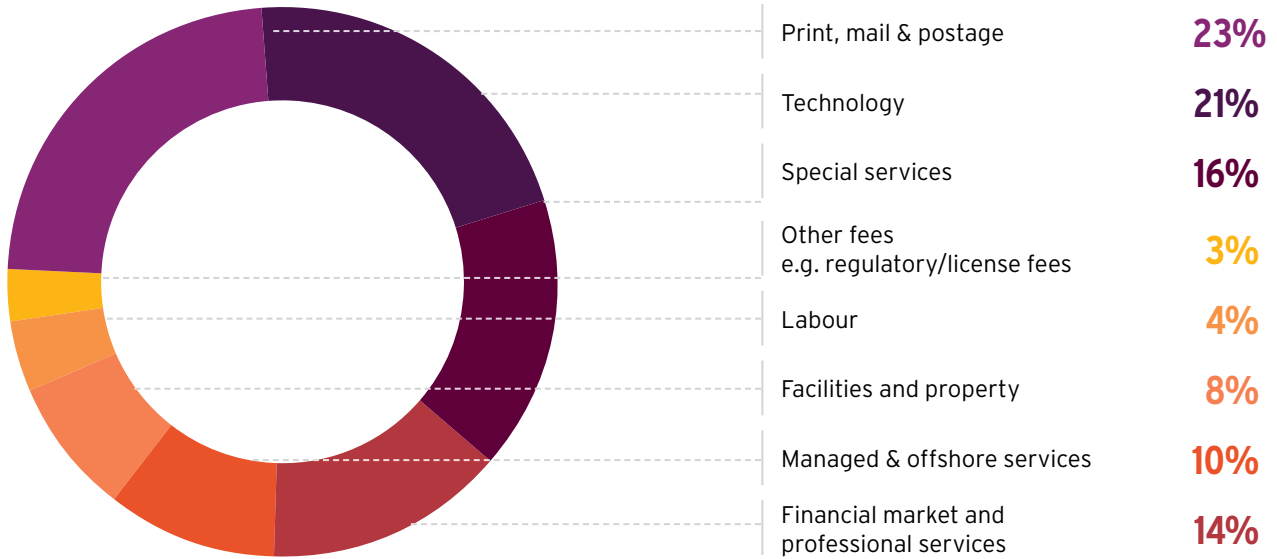
The image below outlines the types of products and services procured for each category across our Top 200 suppliers (84% of global spend) and the countries from which they are purchased.

PROCUREMENT CATEGORIES	EXAMPLES OF GOODS AND SERVICES PROCURED	KEY PURCHASING COUNTRIES
<b>Print, mail and postage</b>	Paper, envelopes, couriers and postal services	Australia, Canada, China/Hong Kong, Ireland, Jersey, New Zealand, South Africa, Switzerland, United States, United Kingdom
<b>Special services</b>	Healthcare, social insurance, insurance	Australia, Canada, China/Hong Kong, Jersey, Ireland, New Zealand, Norway, South Africa, Switzerland, United Kingdom, United States
<b>Technology</b>	Software, telecommunications, IT support services, technology hardware	Australia, Canada, China/Hong Kong, Ireland, New Zealand, South Africa, Switzerland, United Kingdom, United States
<b>Financial market and professional services</b>	Consultancy and other professional services, clearing services, exchange and brokerage fees	Australia, China/Hong Kong, Jersey, Switzerland, United Kingdom, United States
<b>Managed and offshore services</b>	Back office operational support services, technology development, cloud services	Australia, Canada, China/Hong Kong, Switzerland, United Kingdom, United States
<b>Facilities and property</b>	Rent, office fitouts, office equipment, stationery, furniture and onsite services such as cleaning, catering and property maintenance	Australia, Canada, China/Hong Kong, Ireland, South Africa, Switzerland, United Kingdom, United States
<b>Talent acquisition services</b>	Recruitment agencies	Australia, Canada, Ireland, Switzerland, United Kingdom, United States

In FY22 we transacted with over 3,700 different suppliers, with 84% of our supplier spend with our top 200 suppliers and 51% of this spend in the US. Our highest expenses are print, mail and postal services and special services. The graph below contains the details of our Top 200 supplier spend by procurement category.

## SUPPLIER SPEND BY PROCUREMENT CATEGORY

### GLOBAL





# OUR APPROACH TO RISK MANAGEMENT

Computershare views effective management of risk as key to achieving its strategic and operational objectives and fundamental to protection of reputation and shareholder value. Computershare is committed to ensuring that risk management is a core capability and an integral part of the organisation's activities and has therefore developed an Enterprise Risk Management (ERM) Framework.

The ERM Framework sets out the structure and suite of risks relevant to all Computershare businesses and these include Supplier and Counterparty Risk, which is defined as the risk that Suppliers or counterparties fail to deliver on contractual, promised and expected services. Risk appetite statements are approved by the board of directors of the group parent entity, Computershare Limited, and these statements set the amount of risk the business is prepared to tolerate for each risk area. They are reviewed regularly to ensure they remain relevant to manage the total amount of risk we are willing to take in pursuit of our business objectives within acceptable board determined thresholds. Computershare has a low appetite for Supplier and Counterparty Risk.

The ERM Framework supports the achievement of Computershare's objectives by bringing a systematic, consistent and pragmatic approach to identifying, analysing, mitigating and reporting risk and control within acceptable tolerances. The ERM Framework is forward looking and is designed to lead to proactive decision making and ultimately help improve Computershare's performance. The ERM Framework exists to provide a high-level outline of Computershare's approach to risk management that can be applied to the different business environments globally and across all spheres of risk by outlining:

- > the risk management principles associated with the identification, assessment and treatment of risk;
- > a common language and definitions and tools to support the management of risk; and
- > the governance structure and roles and responsibilities for the management and monitoring of risk.

A review of the Risk Management Policy and ERM Framework is coordinated by the Global Risk Group (GRG) on an annual basis. It involves key stakeholders across the business and technology units of Computershare and is approved by the board of Computershare Limited.

Computershare operates a strict three lines of defence model for risk management. This is supported by clear definitions of roles and responsibilities towards risk management. Staff are trained and communicated with on a regular basis in reference to the model and their responsibilities.

In order to develop an understanding of the risk, Computershare considers both the consequences of the risk (impact) and the likelihood that these consequences will occur.

# UNDERSTANDING AND ASSESSING THE MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

In understanding and assessing the risk of modern slavery in our operations and supply chain, Computershare has had regard to the United Nations Guiding Principles as a baseline:

- > A company may cause a human rights impact if its own actions or omissions directly result in that impact
- > A company may contribute to a human rights impact if its actions or omissions contribute to another party causing the impact (for example, by incentivising it)
- > A company may be directly linked to a human rights impact by another entity it has a business relationship with through its operations, products or services

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- > Human trafficking
- > Slavery
- > Servitude
- > Forced labour
- > Debt bondage
- > Forced marriage, and
- > Child exploitation

Computershare has identified the following areas in our corporate operations and corporate supply chain where modern slavery risks may arise:



Our Modern Slavery Working Party, established in 2020, meets regularly to review our business and supply chain activities and to coordinate the implementation of changes needed to comply with our modern slavery commitments across the Group. This working group includes senior management and personnel in areas such as Procurement, People, Legal, Risk and Compliance, ESG and Corporate Communications. The working group is responsible for implementing appropriate practices to manage and mitigate modern slavery risks across our operations and supply chains, and updates are provided to the Computershare Board through the Chief Risk Officer. This year we have also created a sub-working group to progress our Supplier Code of Conduct piece and the implementation of this into our processes.

The following areas were identified for monitoring and review for modern slavery risk.

## **OUR RISKS AS A FINANCIAL SERVICES PROVIDER**

As a provider of a diverse range of financial, governance and other related services, Computershare believes modern slavery risk in our organisation and supply chain is low. As with many financial services companies, there are areas of heightened focus, for example, some locations we operate within are considered higher-risk jurisdictions.

Many of our services are regulated activities and we take our regulatory responsibilities seriously. We have a global compliance program that is designed to ensure that we treat our customers fairly, we monitor and prevent the misuse of our products and services for the purpose of money laundering and terrorist financing, and ensure our staff and suppliers monitor and prevent bribery and corruption in all of our business dealings.

Of the locations we operate within, a number are identified as higher risk locations as per the Global Slavery Index 2018. For Computershare, these are South Africa and China.

## **OUR RISKS AS AN EMPLOYER**

### **Within our direct workforce**

Computershare considers the residual risk of modern slavery within our direct workforce to be very low given that we have direct oversight and control of this aspect of our organisation and we have strong governance and oversight of our hiring practices and working conditions. All employees globally are of minimum working age, have freedom to leave their roles if they choose to do so and no wages are withheld. The majority of our workforce is qualified or skilled in financial services or supporting functions and the nature of the work performed is mainly office or home-based. Alongside this, Computershare is committed to strictly complying with all applicable labour laws and we maintain a zero-tolerance approach for modern slavery within our own operations. We also have a strong policy environment to support this, as detailed in appendix A.

### **Within our indirect workforce**

Computershare uses labour hire firms, predominantly in the US, for temporary labour. This is typically for project based work or to meet seasonal workforce needs. These temporary staff are employees of the labour hire firm, who remain responsible for the payment of their wages and other benefits. Modern Slavery risk across these labour hire firms is assessed as low.

Computershare also utilises a small number of third-party outsource service providers, typically based in locations with lower-cost labour markets. These markets have a higher inherent risk of modern slavery due to the combination of lower wages and less stringent local labour laws and practices. Our processes to monitor and oversee these risks and to ensure that our partners are good and ethical organisations to work with are set out later in this Statement.

## **RISKS POSED WITHIN OUR SUPPLY CHAIN**

When considering our supply chain risks, we have looked at (i) the locations and (ii) the types of goods and services we procure.

### **Supply chain risk locations**

While we believe that the overall risk profile for modern slavery in our supply chain is low, we are aware that certain goods and services, by their very nature, carry with them an increased risk of modern slavery. The steps we have taken to mitigate these risks are set out later in this Statement.

For suppliers from whom we purchase goods and services, our higher-risk locations are South Africa, China, and in both India and the Philippines where we have ~1,100 indirect employees through our third-party outsource service providers.

## **Our higher risk supply chain goods and services**

### **Facilities and premises suppliers (e.g. cleaning and premises maintenance)**

Computershare relies on a number of different companies and services to keep our offices running smoothly and in good working order. These include cleaning staff, caterers, utilities support and building security services.

Suppliers of these types of services have been recognised as potentially using a higher proportion of temporary or foreign workers; and with a heightened risk that these workers are underpaid, work excessive hours or have not received adequate training.

### **IT hardware**

Computershare relies on numerous IT hardware devices, such as servers, mobiles, PCs, laptops and tablet devices. There is a risk that the hardware we procure through our suppliers may have been produced under conditions that breach human rights, such as child labour, forced labour or debt bondage.

### **Paper suppliers (e.g. suppliers to Computershare Communication Services)**

Computershare uses paper to support both its customers and its internal business. However, when sourcing paper, we understand that there is a risk that paper and timber products from the global forestry industry carry a risk of human rights violations, including the use of forced, indentured and child labour.

### **Goods not for resale (e.g. promotional goods)**

Computershare uses a limited amount of branded promotional items for clients, prospects and our staff. We understand that the manufacturing and procurement of these products (such as items of clothing and low-value manufactured items such as branded pens) may contain heightened modern slavery risks, and we are conscious of this when selecting suppliers.

## **OUR RISKS AS A SUPPORTER OF THE COMMUNITY**

There is a risk that we could support, through donations or advocacy, organisations involved in modern slavery.

Computershare's charitable foundation, Change A Life, was founded in 2005 with the aim of making a real difference to the lives of disadvantaged and impoverished communities around the world. Since then, over AU\$11 million has been raised to support 16 projects in 13 countries, supporting sustainable agriculture and reforestation, food security, mobile eye care clinics, disaster relief and a range of programs to advance the education and welfare of at-risk children.

As some of the initiatives that Change A Life supports are in less developed countries, there is a higher risk of modern slavery associated with them. Examples might include the use of contractors to support the building of infrastructure funded by the Change A Life program.

# ADDRESSING OUR MODERN SLAVERY RISKS

As a business, we can measure our success in relation to human rights and modern slavery initiatives in the following areas:

## AS A FINANCIAL SERVICES PROVIDER

Our compliance program closely monitors our risks related to bribery and corruption and ensures that we remain in compliance with applicable laws and regulations. Computershare publishes its Anti-Bribery and Corruption Policy and its Human Rights Policies on the Governance section of our website.

We have established a global Anti-Money Laundering Policy to set global principles and standards for the management of money laundering and terrorist financing risks within Computershare, which helps to reduce any risks of Computershare funding modern slavery and also to meet our regulatory requirements. We comply with all applicable Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) laws and regulations through:

- > Observing Know-Your-Customer (KYC) principles and customer identification regulations - these ensure we identify each client with which we do business to gauge any risks they pose to us (for example, through criminal liabilities). We screen clients when we 'onboard' them and then periodically thereafter (for example, by watching for 'negative news' or sanctions laws brought against them).
- > Recognising, investigating and reporting any suspicious client activity to the relevant criminal authorities in each jurisdiction within which we do business.
- > Protecting the reputation and integrity of the organisation, by ensuring we do not do business with or enter into contracts with undesirable clients that pose reputational or legal risks to us.

Computershare complies with applicable sanctions laws, and we screen our clients, employees and vendors against the relevant sanctions lists for all the major jurisdictions in which we operate (including United Nations, US OFAC and UK HMT). This ensures we avoid, for example, doing business with serious organised criminals who may involve modern slavery in their operations and undertake significant human rights abuses.

Our regulatory e-learning modules (covering our obligations under our group policies on issues such as human rights, anti-bribery and corruption measures, anti-money laundering, data privacy, workplace health and safety, wellbeing and environment, anti-discrimination and bullying, accessibility, diversity and inclusion) have been redesigned over the reporting period using an adaptive learning approach. This approach tests the knowledge retention of staff each year, giving us confidence that the learned behaviours we detail in our 'Being Purple' framework are being embedded. These support our policy environment and global Code of Conduct (see appendix A).

In addition, our key policies are reviewed annually, as are our training modules, to ensure they stay current and in line with any regulatory changes. 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.

### Completion rates:

Produced in seven languages, completed and passed by:



## AS AN EMPLOYER

We operate a rigorous onboarding process that includes the confirmation of appropriate visa status, working entitlements in alignment with Australian and UK legislation, as well as local legislation in the other jurisdictions within which we operate. This includes paying at least the national minimum wage, providing the legal minimum holiday requirement and monitoring and maintaining the required records for working visas. All staff are expected to complete all relevant regulatory learning (including Human Rights training) within four weeks of joining the company.

Our indirect workforce comprises staff who are the employees of onshore labour hire firms, as well as mainly back office and IT staff who are employees of our offshore outsource service providers. The labour hire firms are largely based in the US and are subject to rigorous onboarding and diligence processes through our vendor management function. These firms are subject to robust contractual commitments that require them to follow all applicable labour laws.

Our offshore outsource providers are reputable service providers with whom Computershare has long term relationships. While regular review meetings with our outsource providers remain mostly virtual, we expect that senior Computershare representatives will travel to visit these service providers again in the future. These vendors are required contractually to adhere to our policies and standards and many of them have their own stated published position on modern slavery and human rights. We also have contractual audit and inspection rights over their operations.

Computershare will not tolerate or condone any connection, evidence or suspicion of modern slavery practices in our workplace. Computershare's grievance and whistleblowing policies are available for any reports of such practices to be reported and thoroughly investigated. We continue to build equitable and inclusive practices into our People policies and practices and decision-making protocols.

In each country in which Computershare operates, the company complies with legislated diversity reporting requirements. In Australia, Computershare met its reporting requirements under the Federal Government's Workplace Gender Equality Act 2012, including submitting an annual public report on 22 July 2022.

## AS A PURCHASER OF GOODS AND SERVICES

We have continued to monitor our higher-risk suppliers and those in higher-risk locations. We actively follow up with suppliers that have not previously responded to our request asking them to confirm that they comply with their own Human Rights Policy, or alternatively, commit to comply with Computershare's Human Rights Policy.

Over the past 12 months, we have worked in consultation with procurement teams across all jurisdictions to gain further information from those suppliers who had not previously responded. We have also incorporated requirements to comply with human rights into our processes for onboarding new suppliers.

Procurement teams globally currently monitor suppliers based on spend and risk. This includes vendors managed by Australia, North America, and the UK.

In addition to the top 200 suppliers by spend, we also monitored other higher risk suppliers across the globe based on procurement categories of facilities and premises suppliers, IT hardware, paper suppliers, and goods not for resale.

We continued throughout FY22 to undertake due diligence on our supplier base to better understand their position on human rights and modern slavery.

All new suppliers, as part of their initial onboarding and regular due diligence, must attest they comply with either their own Human Rights policy and/or Computershare's.

## AS PART OF THE COMMUNITY

When identifying and selecting appropriate projects for Change A Life to support, Computershare undertakes an extensive due diligence process before we commit to partnering with the charity. This helps us understand the governance processes the charity follows, which other corporate partners are involved, what support it provides and to whom, and checking there has been no adverse media coverage. Computershare checks in with our selected charity partners regularly and requires them to provide us with regular reports on the status of our projects.

## REMEDATION

Computershare is committed to ensuring that if it is found we have caused, contributed to, or been related in any way to instances of modern slavery, we will ensure that a remediation plan is followed.

To date, we have not found or been notified of any such instances. Should we in the future, we would look to engage with the infringing party to see if we can work together to understand and remediate the issues. Computershare is aware that we have the ability to influence our suppliers (the extent of this influence can depend on the size of the supplier and the type and length of our engagement with them), and we are in the process of enhancing our remediation policy and procedures to follow in the event of any instances coming to light. We want to "do the right thing" - using that influence to help bring change for the better for the people involved with our operations and supply chain.

# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Computershare is committed to continually improving its program of work in relation to understanding, reducing and removing the risk of modern slavery within our existing operations and supply chain. We believe that we have made good progress in further understanding and assessing the risks of modern slavery and we reviewed the effectiveness of our actions and tracked our performance in FY22 through the following measures:

## GOVERNANCE

Number of Human Rights/Corporate Responsibility policy breaches

Number of staff completed regulatory training modules

Number of staff completed specific human rights training

Computershare continues to develop its policies and suites of standards around modern slavery, ESG, anti-bribery and corruption, and anti-money laundering. Reports by all reporting entities with requirements to report on modern slavery are completed under the oversight of the relevant boards of Directors.

## MONITORING

The actions undertaken in relation to our supply chain to date have improved the process of identifying, assessing and addressing modern slavery risk; and in FY22 we tracked the following measures.

### Supply chain monitoring

Review of Top 200 supplier positions on Human Rights/Modern Slavery

Review of higher risk suppliers' positions on Human Rights/Modern Slavery.

Number of sanctions screening hits from vendor onboarding

Number of reports of slavery or trafficking through the Whistleblower Program

## WHISTLEBLOWER PROGRAM

Our Whistleblower Program enables our employees to make reports, including anonymously, should they become aware of or suspect reportable conduct. Matters can be reported through our external [Global Whistleblower Hotline/Website](#), provided by an independent third-party operator, EthicsPoint. This service facilitates anonymous and confidential reporting and is accessible 24 hours a day, seven days a week across all regions in which Computershare operates. All reports submitted through the service are forwarded to the Computershare whistleblower function for assessment and, if appropriate, investigation. The Group Risk and Audit and People and Culture Committees have oversight of all Whistleblower reports that are investigated through this process.

There were no modern slavery or trafficking incidents reported through this channel over the reporting period.

## RISK MANAGEMENT

Computershare has a global Risk Management team who is responsible for maintaining the Global Risk Framework. This includes global policies, processes and tools to store and manage all of Computershare's risk registers, assessments and resultant action plans in relation to modern slavery. All of these activities provide ongoing insight into the effectiveness of action taken as a result of modern slavery risk assessment.

These processes allow us to monitor changes in our business, such as our geographic footprint, conducting business with higher risk vendors, clients and suppliers and if we discovered evidence of modern slavery within Computershare or our supply chain. This would trigger a review and upgrading of the risk and the creation of action plans within our risk management process to manage and mitigate any instances.

There were no review triggers in the reporting period that required action.

# LOOKING FORWARD

Our Modern Slavery Program will support our ongoing commitment to ESG and effectively managing modern slavery risk across our operations and supply chain. We consider the following as priority items to underpin our future endeavours in this important area.

## IMPROVE OUR DATA

Computershare's operations have evolved over recent years to a globally aligned structure, including the recent creation of a global procurement team. As this function itself evolves, we will look to improve our data on suppliers, and this will help support better disclosure. Our newly appointed global Head of Procurement has responsibility for this and is closely involved in a project to update our reporting systems.

## IMPLEMENT A SUPPLIER CODE OF CONDUCT

We are developing a Supplier Code of Conduct that will set out the minimum standards of behaviour that we expect our suppliers to meet in relation to matters such as integrity and ethics, human rights, labour and social standards, and environmental standards. The Supplier Code of Conduct will become part of the onboarding process for new suppliers and a phased plan will be implemented to engage with existing suppliers on the Code.

## DEVELOP OUR SUPPLIER RISK MANAGEMENT FRAMEWORK FURTHER

We will continue to enhance and mature our supplier due diligence program within our ERM Framework, including globalising our due diligence process. This will include establishing an enhanced due diligence process for suppliers where we have formed the view that there is a higher risk of modern slavery relevant to that supplier.

## ENHANCED MODERN SLAVERY TRAINING AND AWARENESS

We have rolled out enhanced Modern Slavery training through Unseen, a specialist training provider, for those staff who may require an enhanced knowledge due to the nature of their roles. The functions we have included in this additional training are Procurement, the People team, Recruitment specialists, Facilities staff and those involved in purchasing IT products, as well as all members of the Modern Slavery Working Party. There will also be a specialist Procurement module for staff who are involved in purchasing goods and services for Computershare.

**Computershare is committed to ensuring that modern slavery has no part in the services we provide or in the supply chains we rely on to provide those services. Computershare wishes to be transparent in the ways in which we are managing modern slavery risk throughout our operations supply chains, and we hope this Statement shows we are serious about implementing and enforcing effective systems and controls across our business and supply chains in support of these commitments.**

**We will continue to build on the efforts of 2022, both within our own organisation and in our working relationships with our suppliers.**



# APPENDIX A

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 business. Alongside this, we have a suite of policies that set clear expectations for every employee.

<b>Global Code of Conduct</b>	The Code of Conduct sets out our overarching expectations for the appropriate conduct of all employees. The core principles of the Code of Conduct form the basis for all of our policies and procedures. The Code of Conduct serves as a guide to assist our people in making the right choice when confronted with an ethical decision.
<b>Global Human Rights Policy</b>	We consider that businesses have an important role to play in respecting human rights - we welcome legislative and other developments that are intended to improve protection for some of the world's most vulnerable people.
<b>Diversity &amp; Inclusion Policy</b>	Computershare sees diversity as a source of strength. We work hard to make sure everyone is included within our organisation, removing barriers and obstacles to give everyone an equal opportunity to succeed. We believe in equality and inclusion regardless of age, ethnicity, cultural background, gender identity, marital or family status, religion, disabilities, socio-economic background or sexual orientation. This applies throughout our Group, around the world, with no exceptions.
<b>Whistleblower Policy</b>	This policy supports Computershare's commitment to the highest standards of ethical conduct and to provide everyone working at Computershare with the means to raise concerns, without fear of retaliation, regarding Reportable Conduct.
<b>Anti-Bribery &amp; Corruption Policy</b>	The Computershare Group takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate. Pivotal to Computershare Group's success is our culture and our reputation for honesty, ethical and legally responsible conduct.
<b>Anti-Money Laundering &amp; Terrorist Financing Policy</b>	It is essential that Computershare Group complies with all applicable legal and regulatory requirements related to Anti-Money Laundering and Anti-Terrorist Financing (both "AML"). This policy outlines Computershare Group's commitment to remaining in compliance with these requirements and reducing or eliminating the exposure of Computershare Group's businesses, entities and employees to AML risks.
<b>Corporate Responsibility Policy</b>	Computershare is committed to being a responsible business - we recognise the environmental and social impacts of our activities and seek to manage them appropriately.

## APPENDIX B

<b>Australian Modern Slavery Act (Mandatory reporting requirements)</b>	<b>Reference in this Statement</b>	<b>UK Modern Slavery Act (Mandatory reporting requirements)</b>
Identify the reporting entity	Section 2 Section 3	Identification of entity with reporting obligations (s. 54(2))
Describe the reporting entity's structure, operations and supply chains	Section 2 Section 3	Organisation structure, business and supply chains (s. 54(5)(a))
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 4	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk (s. 54(5)(d))
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.	Section 5 Appendix A	<p>Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff (s. 54(5)(b), (c), (f))</p> <p>Steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place (i) in any of its supply chains, and (ii) in any part of its own business (s. 54(4))</p>
Describe how the reporting entity assesses the effectiveness of such actions	Section 6	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such indicators as it considers appropriate (s. 54(5)(e))
Describe the process of consultation with (1) any entities the reporting entity owns or controls, and (2) for a reporting entity covered by a joint statement, the entity covered by a joint statement, the entity giving the Statement.	Section 2	N/A
Information that the reporting entity, or the entity giving the Statement, considers relevant.	Section 1 Section 7	N/A