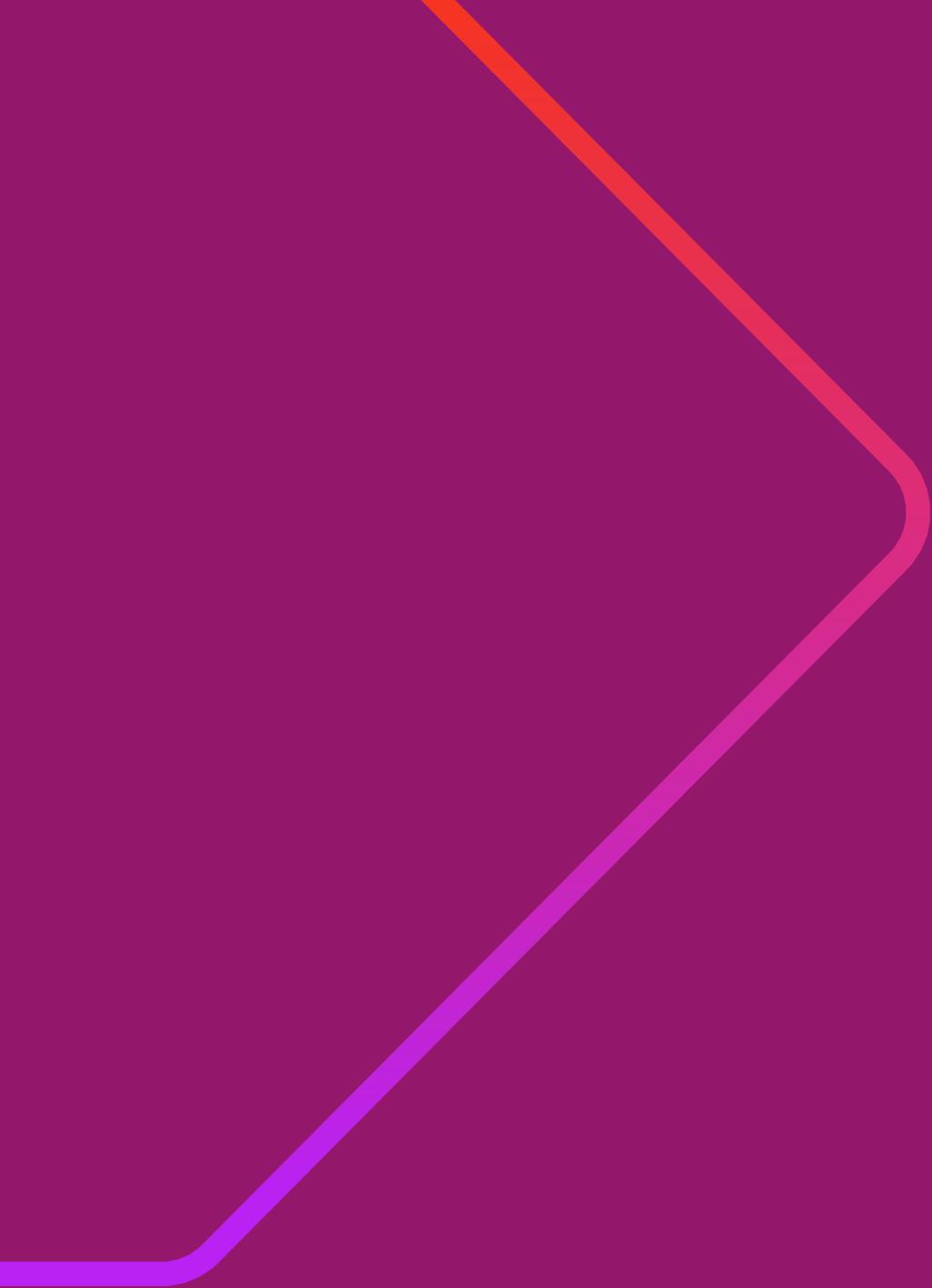


Computershare

2025

Modern Slavery
Statement



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Introduction



Stuart Irving – CEO

Computershare is committed to doing the right thing and supporting our employees, clients, and communities, which is the foundation of our environment, social and governance (ESG) approach. We believe our business has an important role to play in upholding and protecting human rights and our Code of Conduct, Human Rights and ESG policies reflect our commitment to act with integrity in all business dealings and relationships.

We consider that our 'Being Purple' ways of working provide a solid ethical platform for our group processes and procedures. All our employees, from new starters to senior managers, are trained on and regularly communicated with about our policies and expectations of them.

Computershare is classified as a financial and professional services business and whilst we have assessed our overall risk exposure to modern slavery as low, we are determined to ensure that our operations and supply chain do not contain any incidents of modern slavery, and to also be transparent in how we manage these risks. We have controls in place to detect and manage areas of potential modern slavery risk, and we continue to develop and invest in this area, especially in regard to the business partnerships with our suppliers, as you will see later in this statement.

During FY25, we took a range of important actions to enhance our approach to managing the risk of modern slavery in our operations and supply chain:



Conducted a reconciliation of our active supplier base (those with recorded spend) against available supplier modern slavery data to support the development of comprehensive supplier profiles in relation to modern slavery risk.



Implemented a new Enterprise Resource Planning (ERP) system, which has enhanced visibility across our global supplier network. This enables the procurement team to access key information, such as supplier geographical location, spend, and service sector, within a single integrated platform.

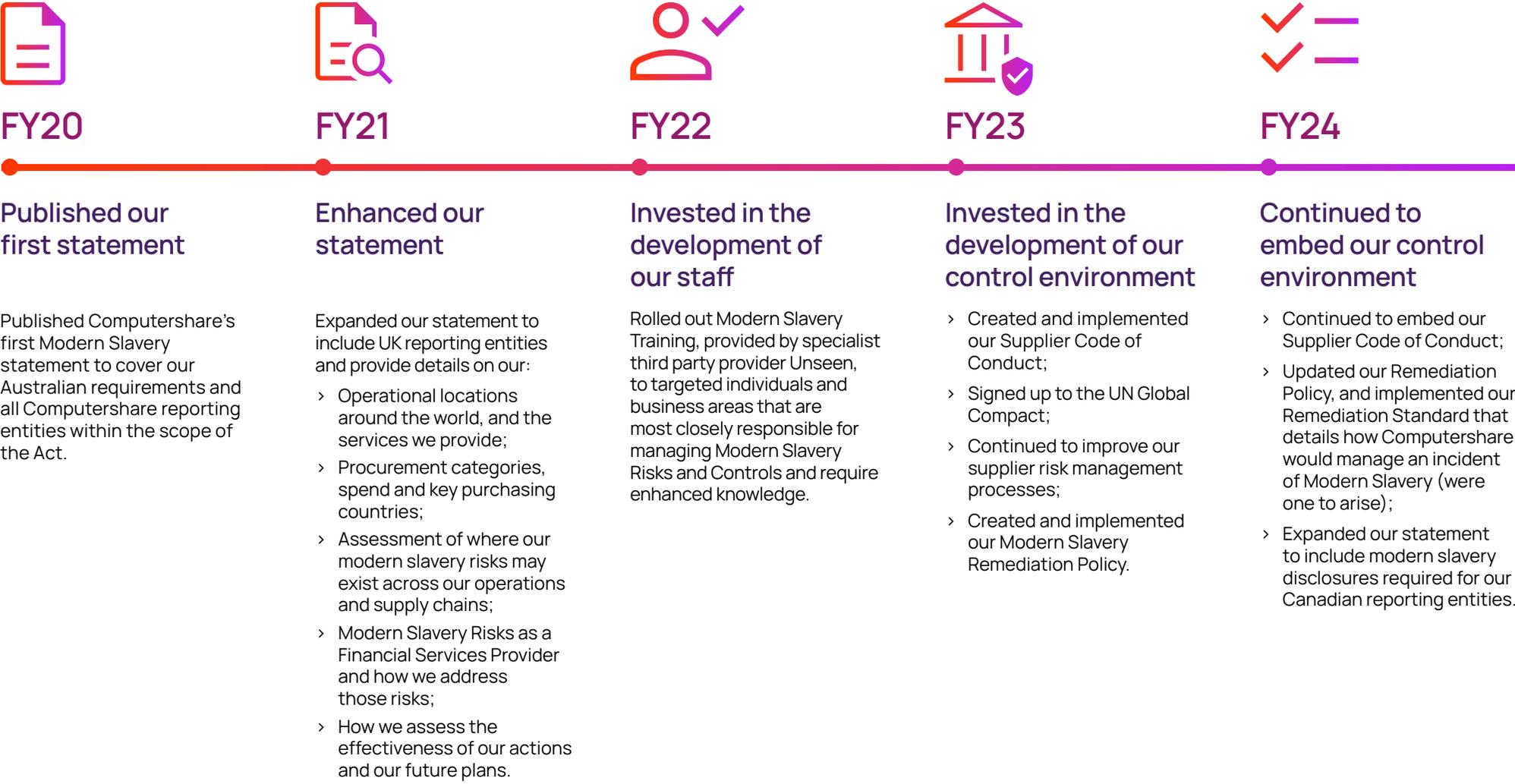


Developed a new Third-Party Risk Management (TPRM) Framework to re-align our vendor management program to industry best practices and incorporate global regulatory requirements. A new Policy and Standard was officially launched in July 2025 and covers all necessary aspects of TPRM, including an updated risk assessment methodology that enables us to better assess supplier risk profiles globally.

We remain committed to ensuring that modern slavery has no part in the services we directly provide or in the supply chains we rely on to provide those services, and to being transparent in how we manage modern slavery risks.

Stuart Irving,
Chief Executive Officer

Our progress



Identifying the reporting entities

About our statement

This Modern Slavery Statement has been prepared by Computershare Limited on behalf of itself and its controlled entities. It complies with the requirements of the Australian Modern Slavery Act 2018, the UK Modern Slavery Act 2015 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 and applies to the year that ended on 30 June 2025. It has been approved by the Board of Computershare Limited on 17 December 2025, by each Australian Reporting Entity¹ on 17 December 2025, by the UK Reporting Entities² on dates between 8 and 15 December 2025 and each Canadian Reporting Entity³ on 8 December 2025. The board of each Australian Reporting Entity, UK Reporting Entity and Canadian 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 comprised of senior management and personnel in areas such as Procurement, People, Legal, Risk and Compliance, ESG 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 2025;
- (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 2025; and
- (iii) Part (2) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the period ended 30 June, and provides a report to the Minister on the steps the Canadian Reporting Entities have taken during the 12 month period prior to the Annual Report deadline of 31 May of every year, to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the Canadian Reporting Entities or of goods imported into Canada by the Canadian Reporting Entities.

A complete list of the controlled entities to which this Statement relates is set out in Computershare's Annual Report.

¹ 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.

² Computershare Investor Services plc, Computershare Technology Services (UK) Limited, Computershare Services Limited, Homeloan Management Limited and Topaz Finance Limited.

³ This statement applies only to Computershare Canada, which shall apply to Computershare Trust Company of Canada ("CTCC") and Computershare Investor Services Inc. ("CISI" and together with CTCC, the "Canadian Reporting Entities") and shall govern the business of all such Canadian Reporting Entities.

Structure, operations and governance

About Computershare

Founded in 1978, the Computershare group is a global market leader in transfer agency and share registration, employee equity plans, proxy solicitation and stakeholder communications. We also specialise in corporate trust, mortgage servicing and a range of other diversified financial and governance services.

Computershare is renowned for our 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 and customers.

Our purpose and values



Purpose

We pioneer innovative solutions that provide certainty and security to help move the financial services industry forward.



Vision

We are the experienced changemakers that customers trust to drive better outcomes.



Mission

We combine our tenacity, ingenuity, deep financial market knowledge and technology to build exceptional solutions our customers depend on.

Our brand values of **Certainty, Ingenuity and Advantage** underpin everything that we do. They are the principles that unify and differentiate the Computershare Group to help drive Computershare's success, giving us the capability to grow and diversify our business over several decades:

CERTAINTY ● **INGENUITY** ● **ADVANTAGE**

Our customers can count on us to deliver every time.

We look beyond today's problems to see tomorrow's opportunities.

We help our customers unlock their competitive advantage.

About Computershare

We are a high quality, capital light business with a long-term track record of delivering growth for our shareholders.

- › Long-term earnings growth, consistent margins and returns to shareholders
- › High-quality, capital-light business with recurring revenues and high client retention
- › Leading positions in large markets with positive growth trends
- › Robust, market-critical proprietary technology and platforms
- › Strong balance sheet and cash flow – funds growth investments and returns to shareholders

Our core businesses

Issuer Services

Since 1978, companies around the globe have trusted us to manage their shareholder registry, corporate actions, and shareholder meetings. We're the number one global transfer agency. As client needs have evolved, so has our portfolio of services, extending our Issuer Services into equity and entity governance services, and investor relations and data services, for both public and private companies worldwide.

Corporate Trust

We're a market leader with deep experience providing trustee and sophisticated agency services for private and public companies, investment bankers, asset managers, governments, and institutions. Our organisation offers a broad range of services and has a best-in-class reputation built on our high-touch approach to client service.

Employee Share Plans

With experience and expertise spanning decades, we're an industry leader in employee share plans. We partner with many of the world's biggest companies to manage their equity-based remuneration plans, supporting them in offering their employees the chance to invest in the future of their company and helping them to manage these investments day to day. Every member of our team plays an important role in bringing to life employee share plans, providing innovative solutions and assisting our clients with their complex regulatory requirements.

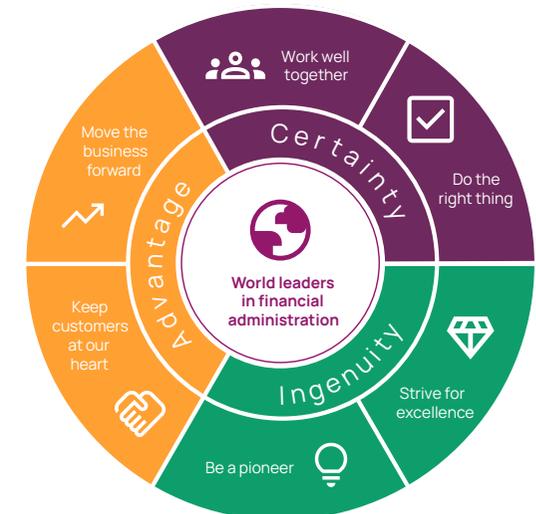
Computershare is represented in all major financial markets and has over 12,000 employees worldwide in over 20 countries. Computershare is also listed on the Australian Securities Exchange under the Industrials Sector and Industry Group: Commercial and Professional Services.

Ways of working

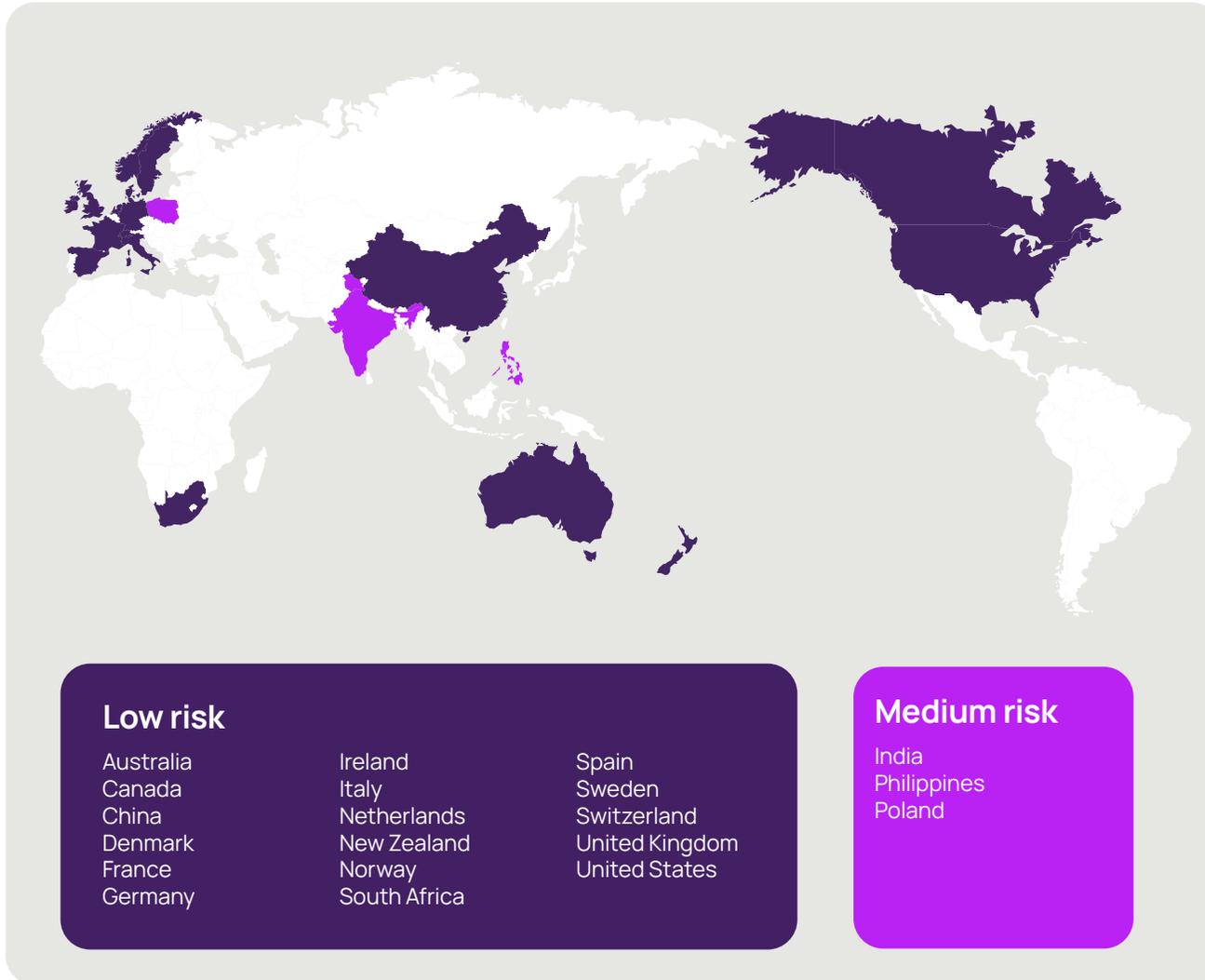
Our unique **Being Purple** ways of working support our values and are a set of positive behavioural signposts for our people. Being Purple also helps us to define the people we want to bring into Computershare and the conduct, behaviours and professional attributes we want to promote and reward.

Detailed guidelines are provided to each member of staff, including our Board of Directors, so that our people know what is expected of them. They reflect what actions can be taken to deliver on these ways of working at every level from employee to senior leader, and our people are assessed against them in their annual performance review. We also provide guidance on 'what it's not' so that our people understand the behaviours we won't accept.

Our Being Purple ways of working also reflect the requirements of our well-established policies on fairness and culture, human rights, harassment, anti-bribery, corruption and whistleblowing.



Computershare locations and key stats



Issuer Services

Communication Services

Employee Share Plans

Mortgage Services and Property Rental Services

Computershare Corporate Trust

Presence in **21** countries

12,522 full-time and part time employees

25,000+ clients

c. **AU\$22bn** market capitalisation

51% female

49% male

2,338 temporary employees

207 fixed-term contract employees

Source: Global Slavery Risk Index Report 2023

Channel Islands, where Computershare also has an office, is not listed in the Global Slavery Risk Index Report.

Where we operate by business line - overview

	Australia	Canada	Channel Islands	China	Denmark	France	Germany	Ireland	India	Italy	Netherlands	Norway	New Zealand	Philippines	Poland	South Africa	Spain	Sweden	Switzerland	UK	USA	
Issuer Services 2,017 employees	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓
Communication Services 839 employees	✓	✓		✓	✓		✓	✓					✓								✓	✓
Employee Share Plans 1,098 employees	✓	✓	✓	✓	✓		✓	✓		✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓
Mortgage Services and Property Rental Services 982 employees								✓													✓	
Computershare Corporate Trust 2,819 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

Mortgage Services and Property Rental Services

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

Computershare Corporate Trust

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

Stats at 30 June 2025. Employee stats include Full Time Equivalent (direct employees only) and excluding Technology/Operations (3,783 employees) and Shared Services (1,352 employees).

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/mail and document custody facilities supporting our Communication Services and Corporate Trust businesses respectively.

Modern Slavery Governance Structure

Computershare’s response to managing modern slavery risk within our operations and supply chain is led by the risk function, in coordination with business operations.

Computershare Group Board (and relevant subsidiary boards in Australia, Canada and the UK)	Approves Statement
CEO and Global Management team	CEO signs statement. CFO, Chief People and ESG Officer and Group General Counsel and Company Secretary review and recommend approval of the statement.
Modern Slavery Steering Group	<ol style="list-style-type: none"> 1. Produces the annual statement for approval and publication. 2. Monitors global legislation and developments. 3. Identifies and monitors modern slavery risks. 4. Identifies, recommends and then monitors areas for development and continuous improvement. 5. Monitors key performance and risk indicators.
Procurement	Develops and manages supply chain framework, standards, risk and contracting.
Risk	Develops and implements risk management framework and oversight.
Other business operations	Provide subject matter expertise across legal, ESG, Risk, Procurement, Employment, Training and Awareness, Policy, and ensure Modern Slavery management is embedded in their business areas globally.
Internal Audit	Conduct internal audits and reviews across the business environment.

Our supply chains

We have a diverse supply chain where goods and services are sourced by our procurement teams across eighteen main categories: Couriers, Equipment, Facilities Management, Financial Services, Insurance, Learning & Development, Mailing House, Marketing, Materials, Mortgage Servicing, Payroll Services, Postage, Printing, Professional Services, Staff Benefits, Talent Acquisition, Technology, and Treasury Services.

The image below outlines the types of products and services procured for each category across our supplier base, along with the inherent risks associated with each category, using the Global Slavery Index, and based on the highest risk country or category (service and sector).

Procurement Categories	Example of Goods and Services Procured	Supplier Domicile Country	Inherent Risk
Couriers	Couriers & Freight	Australia, Canada, China, Ireland, Jersey, New Zealand, Norway, South Africa, Switzerland, United Kingdom, United States, Virgin Islands, British	Low
Equipment	CCS Commercial Production Equipment, Equipment & machinery, Facilities Management	Australia, Canada, China, Ireland, South Africa, United Kingdom, United States	Low
Facilities Management	Capital improvements, Catering, Cleaning, Environmental, health & safety, Equipment, Facilities Management Equipment & machinery, Facilities Management Other, Furniture, Furniture & fixtures, General hardware, Landscaping/grounds maintenance, Motor Vehicles, Office Rent, Outsourced Facility Management Services, Parking, Pest Control Services, Record Storage, Refurbishment, Removalist/Office Relocation Services, Repairs & Maintenance, Security, Stationery, Utilities, Waste Management	Australia, Canada, China, India, Ireland, Jersey, New Zealand, Norway, South Africa, Spain, Sweden, Switzerland, Thailand, United Kingdom, United States	High
Financial Services	Accounting Fees, Bureau Fees & Subscriptions (Financial Services), Business Licenses, Charitable Expenses, Consulting Services (Financial Services), Corporate Trust, Financial Services Market Data, Governance Services, Investor Accounting, Other Financial Services Costs, Professional Services (Financial Services), Treasury Services (Banking)	Australia, Bermuda, Canada, China, Cayman Islands, Finland, France, Germany, India, Ireland, Japan, Netherlands, New Zealand, Norway, Papua New Guinea, Singapore, South Africa, Spain, Switzerland, Taiwan, Thailand, United Kingdom, United States	High
Insurance	Group Insurance, Health & Benefits, Regional	Australia, Canada, China, France, India, Ireland, New Zealand, Switzerland, United Kingdom, United States	Medium
Learning & Development	Learning & Development	Australia, Ireland, Jersey, South Africa, United Kingdom, United States	Low
Mailing House	CCS Outsourced Services (Mailing House)	Australia, Canada, New Zealand, South Africa, United States	Low

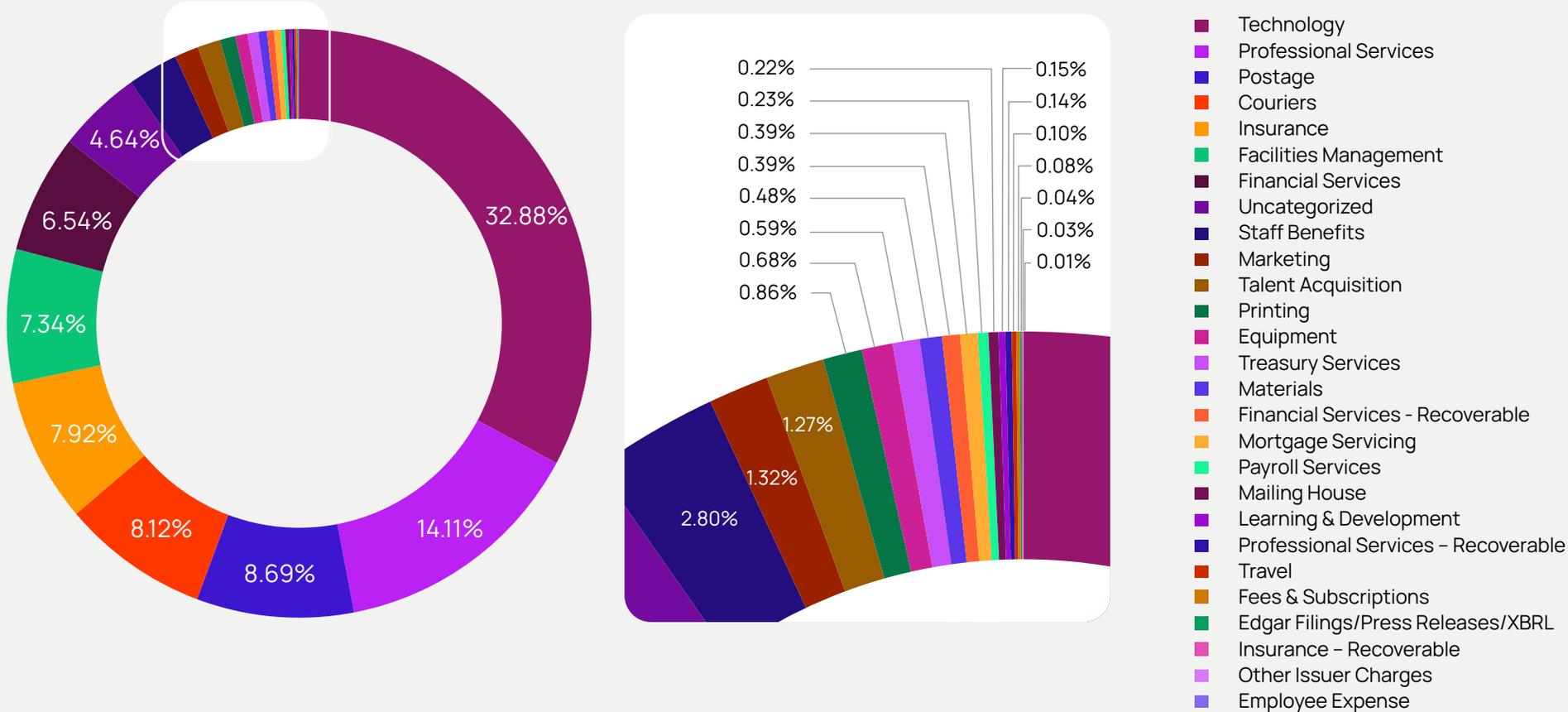
OUR SUPPLY CHAINS

Procurement Categories	Example of Goods and Services Procured	Supplier Domicile Country	Inherent Risk
Marketing	Brand, Client/Court Directed Product Advertisements, Comms, Direct to Customer Marketing, Events, Marketing Agency, Media, Memberships, Public Relations, Research & Analytics, Sponsorships	Australia, Canada, China, Denmark, Guernsey, India, Israel, Netherlands, New Zealand, Norway, South Africa, Switzerland, United Kingdom, United States	High
Materials	CCS Materials/consumables, CCS Owned Stocks, CCS Procured Stocks (For Clients)	Australia, Canada, United Kingdom, United States	High
Mortgage Servicing	Direct Servicing, Loan Administration, Mortgage Servicing Vendor Services, Other Services, Valuation Services	Canada, United Kingdom	Low
Payroll Services	Payroll Management Services	Australia, Canada, China, Netherlands, Norway, South Africa, Spain, Switzerland, United Kingdom, United States	Low
Postage	CCS Postage, Other Admin Expenses (Postage), Postage	Ireland, New Zealand, South Africa, United States	Low
Printing	CCS Outsourced Services (Printing), Other Admin Expenses (Printing)	Australia, Canada, China, Ireland, New Zealand, South Africa, Switzerland, United Kingdom, United States	Low
Professional Services	Bureau Fees & Subscriptions (Professional Services), Consulting Services (Professional Services), Legal/Risk/Audit, Outsourced Services, Supplemental Labor, Translation Services	Argentina, Armenia, Australia, Austria, Bahrain, Barbados, Belgium, Bermuda, Brazil, Bulgaria, Cambodia, Cameroon, Canada, Cayman Islands, China, Colombia, Cook Islands, Costa Rica, Croatia, Cyprus, Czech Republic, Denmark, Dominican Republic, Ecuador, Egypt, El Salvador, Estonia, Fiji, Finland, France, Georgia, Germany, Ghana, Greece, Guatemala, Guernsey, Honduras, Hungary, Iceland, India, Indonesia, Ireland, Isle of Man, Israel, Italy, Japan, Jersey, Kazakhstan, Kenya, Republic of Korea, Lao People's Democratic Republic, Latvia, Luxembourg, Malaysia, Maldives, Malta, Mauritius, Mexico, Morocco, Mozambique, Namibia, Netherlands, New Zealand, Norway, Pakistan, Panama, Peru, Philippines, Poland, Portugal, Puerto Rico, Qatar, Romania, Rwanda, Saint Lucia, Saudi Arabia, Serbia, Singapore, Slovakia, Slovenia, South Africa, Spain, Sri Lanka, Sweden, Switzerland, Taiwan, United Republic of Tanzania, Thailand, Trinidad and Tobago, Tunisia, Türkiye, Ukraine, United Arab Emirates, United Kingdom, United States, Uruguay, Venezuela, Vietnam, British Virgin Islands (These largely comprise a network of law firms who support our clients in ensuring entity management compliance across their organisations)	High
Staff Benefits	Employee Benefits, Staff Benefits, Staff Benefits Insurance	Australia, Canada, China, India, Ireland, New Zealand, Norway, Singapore, South Africa, Spain, Switzerland, United Kingdom, United States	Medium
Talent Acquisition	Recruitment Services	Australia, Canada, China, India, Ireland, Jersey, Mauritius, Norway, Singapore, United Kingdom, United States	Medium
Technology	Data Centre, Hardware, SaaS/Hosted Cloud Services, Software, Technology Market Data, Technology Professional Services, Telecommunications	Australia, Austria, Belgium, Canada, China, Czech Republic, Denmark, Germany, India, Ireland, Italy, Jersey, Luxembourg, Netherlands, New Zealand, Norway, Singapore, South Africa, Spain, Switzerland, United Kingdom, United States	High
Treasury Services	Treasury Services	India, South Africa, Switzerland, United States	Medium

OUR SUPPLY CHAINS

In FY25 we transacted with 2,211 different suppliers with a global spend of US\$916,522,581. 45% of global supplier spend is with suppliers domiciled in the United States. 92% of our supplier spend is with our top 300 suppliers. Our highest expenses are Technology, Professional Services, Postage, Couriers and Insurance. The graph below contains the details of our FY25 supplier spend by procurement category.

Supplier Spend by Procurement Category

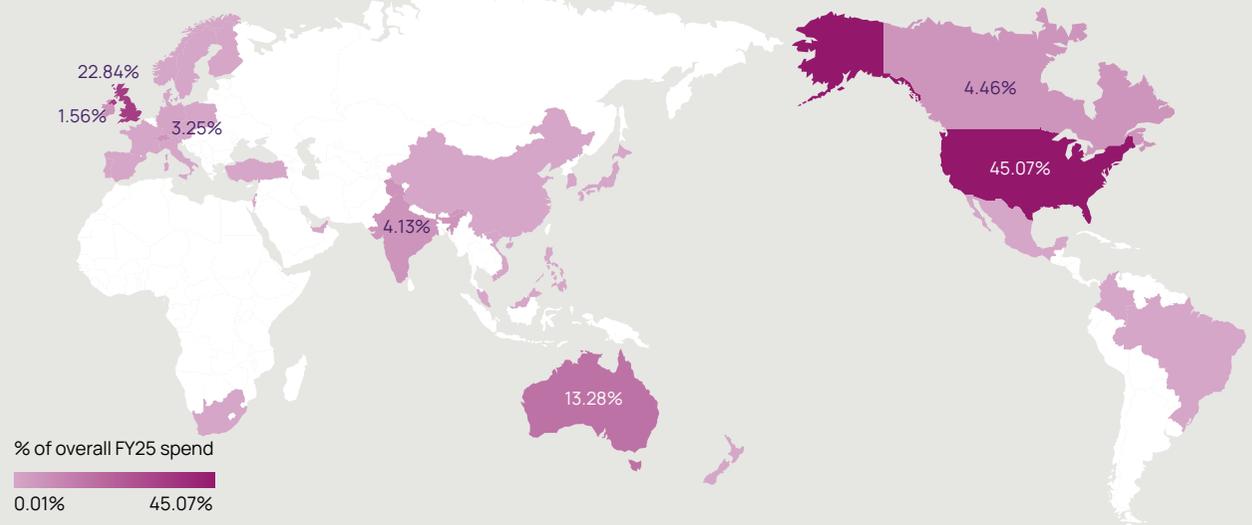


OUR SUPPLY CHAINS

This map represents supplier domicile countries, and their share of total spend. The top five – United States, United Kingdom, Australia, Canada, and India account for 90% of spend. All suppliers with FY25 spend are tracked for Modern Slavery compliance. As of this reporting period, 48% have an acceptable Modern Slavery posture, either by formally agreeing to Computershare's Supplier Code of Conduct or by upholding their own equivalent policy. The remaining 52% are in low risk areas and/or service sectors, and Computershare will continue to work to address this gap in FY26.

Note: Chart displays only countries contributing $\geq 0.01\%$ of total spend (rounded)

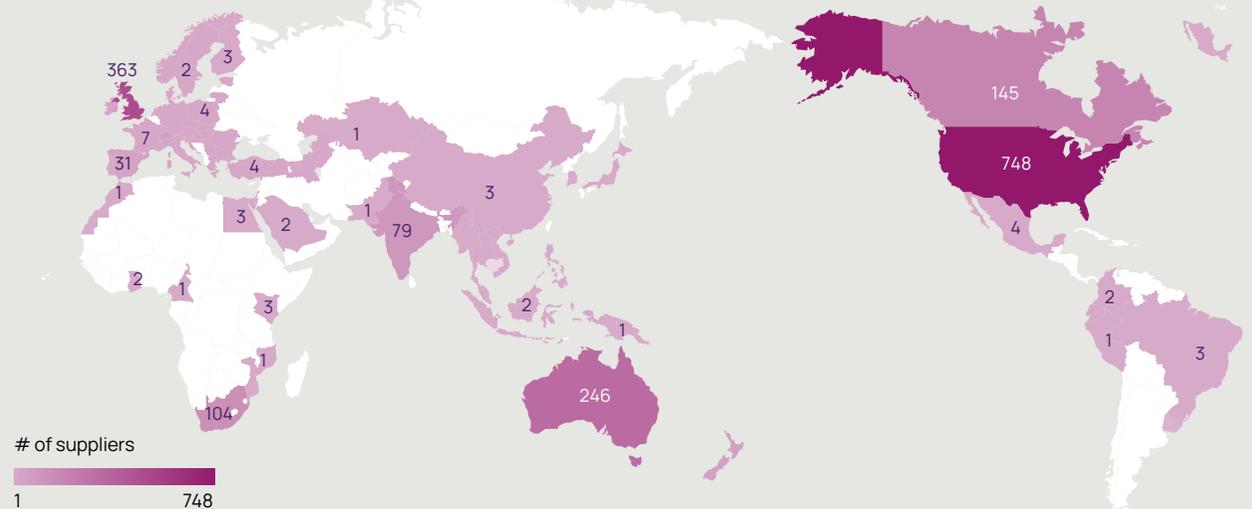
FY25 supplier spend by supplier domicile country



This map details our FY25 supplier count by supplier domicile country. In support of our continued commitment to transparency and ethical sourcing, we will enhance our FY26 reporting through several initiatives, which will focus on obtaining missing Modern Slavery posture information and working closely with stakeholders to verify the location where services are performed.

* For suppliers that operate globally, the domicile country is identified as the jurisdiction with the highest modern slavery or human rights risk rating where the supplier maintains a legal or operational presence and where Computershare has a direct or ongoing commercial relationship.

Supplier count with FY25 spend by supplier domicile country



Modern slavery risks in the operations of entities covered by this statement

Our approach to risk management

Computershare views effective management of risk as key to achieving our strategic and operational objectives and fundamental to protecting our 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 this is achieved through the adoption of an Enterprise Risk Management Framework (ERMF).

The ERMF sets out the structure and suite of risks relevant to all Computershare businesses.

The key risks that directly relate to Modern Slavery in Computershare include:

- › Supplier and Counterparty,
- › Compliance and Regulations,
- › Financial Crime (which includes Money Laundering, Anti-bribery and Corruption and Terrorist Financing); and
- › People Risk.

To provide an example of how our ERMF works, we will use Supplier and Counterparty Risk.

This risk type is defined as "the risk that Suppliers or Counterparties fail to deliver on contractual, promised and expected services".

For each risk type, 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 and help manage the total amount of risk Computershare is prepared to take in pursuit of our business objectives within acceptable Board-determined thresholds. Computershare has a low appetite for Supplier and Counterparty Risk.

For each risk appetite, a suite of underpinning Key Risk Indicators (metrics) are developed and reported to the Board to ensure that appropriate monitoring and oversight is in place. Where the metric is adverse, mitigating actions are agreed to strengthen our control environment.

The ERMF 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 ERMF is forward looking and is designed to lead to proactive decision making and ultimately help improve Computershare's performance. The ERMF 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 types of risk by outlining:

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

A review of the Risk Management Policy and ERMF 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 any proposed amendments must be approved by the Board of Computershare Limited.

MODERN SLAVERY RISKS IN THE OPERATIONS OF ENTITIES COVERED BY THIS STATEMENT

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 specific responsibilities.

First Line of Defence – Activities related to generating revenue, reducing expenses, or providing support to risk-taking activities (e.g. Operations or IT). The first line of defence has full ownership and accountability for managing risks inherent in their activities; is responsible for identifying, measuring, managing, monitoring and reporting risks in line with the Board's risk appetite; ensuring the performance and effectiveness of controls required to comply with risk appetite and policies.

Second Line of Defence – Independent Oversight. Activities related to providing independent risk management oversight of first line activities. The second line of defence establishes the risk management framework and associated standards and independently reviews, challenges and assess risks against Board risk appetite; ensuring independent review and challenge of activities, processes and controls carried out by the first line and have the appropriate authority to do so; ensuring the performance and effectiveness of independent controls.

Third Line of Defence – Independent Assurance. Activities related to providing independent assurance over the risk and control activities carried out by the first and second lines. Establishing a framework for assessing the risk management and control activities in the first and second lines. Provide independent assurance over the adequacy of the overall risk and control framework to the Risk and Audit Committee.

To develop an understanding of the risk, Computershare considers both the consequences of the risk (impact) and the likelihood (probability) that these consequences will occur. The framework provides structure and thresholds for both impact and probability.

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); and
- > 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. Specific practices that constitute modern slavery can include:

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

Our Modern Slavery Working Party met regularly in FY25 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 identifying areas for improvement and implementing appropriate practices to manage and mitigate modern slavery risks across our operations and supply chains.

MODERN SLAVERY RISKS IN THE OPERATIONS OF ENTITIES COVERED BY THIS STATEMENT

We assess our risks from a variety of perspectives in relation to modern slavery and third party risk in particular. This includes looking at industry sectors (and the services provided) and geographical locations where those services are provided from, as two specific areas where the potential risk of modern slavery is higher for our organisation. Computershare has identified these areas in our operations and supply chain where modern slavery risks may arise:



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

Our risks as a financial and professional 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 and professional 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, 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 material locations we operate within, a number are identified as medium risk locations as per the Global Slavery Index 2023 (as referenced on page 8). For Computershare, these are India, Poland and the Philippines.

We have established a consistent global due-diligence and on-boarding process for our suppliers.

With evolving industry, risks and regulations associated with third-party risk assessments, in January 2025, a team of Subject Matter Experts from Procurement, Risk, Compliance, Legal, Information Security, IT Vendor Management, Privacy, Resiliency, Audit, and first line business partners came together at Computershare to form a working group which resulted in the adoption of Computershare's Global Third Party Risk Management (TPRM) Policy and Standard that is aligned to best practice standards on TPRM.

The new standard distinguishes between regulatory requirements and a supplier's risk profile (critical/non-critical and High/Medium/Low Risk). The oversight program and frequency is determined by factors including data access, service criticality, inherent risk, location, and occurs at intervals deemed appropriate to the nature of the engagement.

Identified higher risk jurisdictions

Computershare has identified (applying the Global Slavery Index Report 2023) three jurisdictions in which it has a material presence that are higher-risk from a modern slavery perspective. These are India, Poland and the Philippines.

In FY23, we provided an update on the establishment of our operations in India, in FY24 we included information on our Polish operations and in this report we are providing information on our presence in Manila, in the Philippines.

Establishing operations in the Philippines

Since 2012, Computershare has employed the services of Cognizant Worldwide Limited (Cognizant) to provide contact centre operations, including voice and chat channel support.

This service supports our Issuer Services and Employee Share Plans business lines in US, Canada and Australia.

We completed a thorough due diligence process when we selected and set this operation up with Cognizant, and our vendor management team and business owners monitor our selected vendors on an annual basis and evaluate performance and risk.

Cognizant publishes its own Statement on Modern Slavery. In their FY24 Statement they also recognize the Philippines as a higher-risk location, and have conducted baseline reviews regarding Cognizant's higher-risk activities such as the purchase of office consumables, cleaning and security services and labour hire.

Fair Treatment, Workspace Conditions and Equal Opportunities

The number of staff working for Computershare (through Cognizant) in Manila ranges from 250 – 450 people, depending on seasonal variances (such as during tax season, where call volume increases). The staff in Manila are employed by Cognizant, who are required to meet all local employment and working condition laws. We also have contractual arrangements with Cognizant which impose detailed obligations to ensure that there are no incidents of modern slavery when providing services to Computershare. Other areas covered include ensuring that staff are paid at least the legal minimum wage or the prevailing industry wage where the facility is located (whichever is higher) and that staff are provided a safe and healthy workplace. Staff also have access to a non-retaliation policy that permits staff to speak with Computershare or its auditors without fear of retaliation by our provider or its management.

Engagement and Oversight

- › Computershare has an onsite manager who works directly with the Cognizant team to coordinate daily operations.
- › Daily meetings occur between the Computershare onshore teams and the Cognizant team to coordinate matters such as operational priorities, training and scheduling.
- › Monthly business review meetings are held to review matters such as performance, initiatives, and project progress.
- › Computershare and Cognizant have a shared operating model and quality program.
- › Computershare and Cognizant have a shared staff incentive program with staff in the Manila operation participating in and receiving awards from Computershare for excellent service.
- › Cognizant staff follow Computershare relevant policies and standards, which mirror the processes and policies of their onshore operations counterparts.

As examples, call handling procedures and escalation flows all mirror Computershare's onshore operations. In addition, Cognizant staff must complete all mandatory training courses (For example Computershare and me, Anti Money Laundering, Insider Trading, Fraud Awareness).

- › Monthly meetings are held between senior operations leadership in Computershare and Cognizant.
- › Annual visits to Cognizant by members of our Global Management Team.
- › Annual trips (working visits) by Computershare operations management from North America and Australia.

Computershare's management team have relationships with Cognizant Manila staff at all levels. Throughout this long business relationship there have been no reported, suspected or identified incidents or suspicions of Modern Slavery.

Incidents of Modern Slavery

Computershare has invested in a centralised system for recording and managing our supplier activity globally, and as supplier records are added and improved, we have been able to conduct a deeper assessment of our supplier data and have identified a number of suppliers that provided services to us in FY25 from higher risk geographical locations (GRI). These were professional services, from suppliers in areas such as Legal, Risk and Audit, and are considered low risk sectors.

Computershare will continue to populate our database and assess the locations and services provided to provide assurance that our suppliers act in compliance with our Supplier Code of Conduct.

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, including but not limited to governance and oversight of our hiring and screening practices and working conditions. All employees globally are of at least the minimum working age in accordance with local legislation, have freedom to leave their roles if they choose to do so and no wages that they are entitled to are withheld.

All positions within Computershare are captured in our core People management system. Our hiring practices help ensure that every new position and requisition is:

- › Raised in our system within defined parameters and standards
- › Follows a system driven approval process,
- › Compliant with at least the minimum standards in each country we operate.

The majority of our workforce is qualified or skilled in financial and professional 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 to modern slavery within our own operations. We also have a strong policy environment to support this (detailed in Appendix A). To help manage our risks as an employer and as part of our continuous investment in employee capabilities, we ensure our mandatory training covers the information that our employees need to know to carry out their roles effectively, and we monitor our completion rates as part of our training governance framework.

In FY25, 99% of eligible staff completed our mandatory e-learning modules on human rights, anti-bribery and corruption measures, and anti-money laundering. Each year, all staff are also required to attest to the Computershare Global Employee Handbook and our policies, including the Group Code of Conduct.

Some roles in our business require additional understanding of modern slavery risks. In FY25, members of the Procurement, Facilities, Recruitment and wider People teams, as well as those involved in purchasing IT products and our modern slavery working group, participated again in enhanced modern anti-slavery training through Unseen, a specialist training provider in the UK. Over 50 staff completed the modules, including 15 procurement staff who completed additional training.

The topics covered in this training were:

1. Modern Slavery and Human Trafficking – Know the types and scale of modern slavery and human trafficking globally.
2. Spot the Signs and Take Action – Be able to spot the signs of exploitation in the workplace and feel confident in taking safe and appropriate action.
3. The Role of Business – Understand the role that businesses play in modern slavery and how companies can tackle exploitation.
4. Continuous Improvement – Recognise the difference between compliance and continuous improvement in preventing modern slavery.

All individuals were asked to use the learning when carrying out their day to day responsibilities.

FY25 completion rates:

- › Modern Slavery in Business: 93% (54 out of 58 completions)
- › Modern Slavery in Procurement: 87% (13 out of 15 completions)

All 58 individuals completed the required training within one week of the financial year end.

We have health and safety measures in place globally, and expect all employees to:

- › Comply with and be protected by all relevant safety rules and practices
- › Follow instructions concerning safe and efficient work practices
- › Advise their manager or a People team representative if they become aware of an unsafe or careless work practice or activity
- › Complete our Global Health & Safety mandatory training (99% completion)

MODERN SLAVERY RISKS IN THE OPERATIONS OF ENTITIES COVERED BY THIS STATEMENT

As part of our Being Purple ways of working, our commitment to “do the right thing” is supported by our broader fairness and culture initiatives. These programs help promote our human rights commitments by reinforcing that discrimination, harassment and victimisation will not be tolerated in any way at Computershare.

To help drive our fairness and culture strategy we have established groups and committees, including a fairness and culture working group and eight employee resource groups. These are employee-led groups that play an important role in embedding inclusion across the company by helping drive and raise awareness of people related policies and strategies. These support the business in making informed decisions across Computershare’s People policies, practices, and procedures that support the values of fairness, equality, inclusivity, respect and integrity.

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 at a residual level. These arrangements are also supported by contractual obligations from our providers that impose requirements on them to not permit or authorise any modern slavery practices in the services that they provide to Computershare.

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 that monitor and oversee these risks and help ensure that our partners are good and ethical organisations to work with, are set out later in this Statement. We have also provided an overview of our relationship with a key partner in the Philippines elsewhere in this Statement.

We do our best to ensure there is consistency and transparency in the process we follow when recruiting for our indirect workforce. We have a screening policy in place that requires the following checks by a third party: pre-employee checks, right to work checks, criminal backgrounds, and government-issued IDs. Computershare has an internal process in place if there are any red flags or concerns raised during the recruitment process, which helps us decide if we approve an individual to work or not. There is also an avenue to raise concerns after indirect employees begin their employment.

Risks posed within our supply chain

When considering our Modern Slavery supply chain risks, we have specifically looked at (i) the geographical locations and (ii) the types of goods and services we procure in each of these geographical regions.

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 geographical locations, by their 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.

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 our customers and 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.

As part of our Net Zero program we are driving global initiatives aimed at digitising our products and reducing paper usage associated with our product/service delivery in the medium to long-term. We are also aiming to improve the certification standards and the way we track all paper products we procure.

In FY25, our Communication Services business reduced their use of paper by 9%.

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 workplace giving program, Change A Life, was founded in 2005 with the aim of making a real difference to communities around the world. Since then, over AU\$13 million has been raised, 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 undertaken 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 for a vetted charitable institution that is 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 and professional 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 our Anti-Bribery and Corruption Policy and Human Rights Policy on the Governance section of our corporate website. Both policies are reviewed by the Board annually as part of the Board policy review cycle.

Our Global Anti-Money Laundering Policy sets 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 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 whom 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 coverage 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 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, Australian DFAT, Canadian Sanction Lists and NZ Sanction Lists). This ensures we avoid, for example, doing business with serious organised criminals or sanctioned entities that 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, sanction screening, data privacy, workplace health and safety, wellbeing, ESG, anti-discrimination and bullying, accessibility and diversity and inclusion) have been redesigned 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 remain 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.

MODERN SLAVERY RISKS IN THE OPERATIONS OF ENTITIES COVERED BY THIS STATEMENT

FY25 completion rates of training related to modern slavery:

The training modules below touch on different aspects of modern slavery risk and are assigned to all employees to complete in different months of the calendar year. The following training is produced in seven languages.

- › Computershare and Me, including human rights training: 99.70% completed (+0.49 vs. FY24)
- › Ethical Behaviours and Anti-Bribery and Corruption: 99.67% completed (+0.55% vs. FY24)
- › Anti-Money Laundering and Terrorist Financing: 99.70% completed (+0.57% vs. FY24)

As an employer

We operate a rigorous onboarding process that includes the confirmation of appropriate visa status and working entitlements in alignment with legislation for both our direct and indirect workforce in all of the jurisdictions in which we operate. This includes paying at least the national minimum wage, providing at least 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 and employees of our offshore outsource service providers, which are mainly back office and IT staff. 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 also 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 established long term relationships. While regular review meetings with our outsource providers are mostly virtual, senior Computershare representatives also travel to visit these service providers on a periodic basis. 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 which is reviewed periodically to ensure alignment with our own policies and standards. We also have contractual audit and inspection rights over their operations and over their supply chain.

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

- › Our Whistleblower program enables our employees and suppliers to make reports, including anonymously, should they become aware of, or suspect, reportable conduct. Reportable conduct includes if a person becomes aware of or suspects an instance of modern slavery in Computershare's operations or supply chain. The Whistleblower Program is promoted extensively internally, including in our Code of Conduct.

In FY25, zero instances of whistleblowing related to modern slavery were reported. Information on how to report is clearly signposted on Computershare's intranet and including in our annual mandatory training.

In addition to whistleblowing, all employees have the right to raise a grievance in a confidential manner, by raising this via the core People management system. There are robust processes in place to ensure these are managed consistently with the Global Employee Relations team. In FY25, zero grievances were raised in relation to Human Rights/Modern Slavery.

If an employee has concerns about any health and safety issues, our intranet site clearly signposts our global and local policies, and how to raise any concerns and request support.

In each country in which Computershare operates, the company complies with all required legislated diversity reporting requirements. Computershare is required to report annually on Gender Pay Parity in Australia, South Africa, Ireland and the UK, and we also voluntarily provide this data every four years in Switzerland. Going forward, we will also report this information relevant to the EU pay transparency legislation and enhanced requirements in Australia. Our Australian and UK reports are published externally, and links to these reports can be found on the Governance section of our website.

MODERN SLAVERY RISKS IN THE OPERATIONS OF ENTITIES COVERED BY THIS STATEMENT

As a purchaser of goods and services

All new suppliers, and existing suppliers at the point of onboarding and/or recurring assessment, are asked to attest that they have their own Human Rights Policy or the equivalent of our Supplier Code of Conduct.

Our Procurement teams around the globe track suppliers based on spend and risk. Currently this process is managed manually, and we aim to move towards an automated process, supported by technology, where suppliers will be required to reconfirm that they comply with our requirements on an annual basis.

All suppliers with FY25 spend were assessed from a Modern Slavery perspective. As of this reporting period, we determined that 48% of suppliers have an acceptable Modern Slavery posture – either by formally agreeing to Computershare’s Supplier Code of Conduct or by upholding their own equivalent policy. The remaining 52% of suppliers were all in low risk areas from a modern slavery perspective and we aim to continue our efforts in assessing this group of suppliers in FY26.

In support of our continued commitment to transparency and ethical sourcing, we will enhance our FY26 reporting through several initiatives, which will focus on obtaining further Modern Slavery posture information and working closely with stakeholders to verify the location of where services are performed.

With a more robust foundation for supplier profiling, we are positioned to take a more forward-looking approach by strategising and capturing additional key data points for our key suppliers. This includes identifying supplier service locations and addressing any gaps in modern slavery posture information to further strengthen the depth and quality of our supplier profiles.

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 visits the location of our major project, regularly meets with our selected charity partners and requires them to provide us with annual reports on the status of our projects.

Remediation

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, a remediation plan is followed. To this end, in FY23 we implemented a Remediation Policy following the guidance of "Stronger Together". In FY25, Computershare reviewed this Remediation Policy and determined that no changes were needed as the process is adequately embedded in our onboarding and supplier life cycle process.

We had no instances of modern slavery reported during this statement year. Should we in the future, we expect the infringing party to remediate and we will work with them accordingly. Should they be unable to do so to our satisfaction, we would seek to terminate our services with them.

Computershare is aware that we have the capacity 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 want to do the right thing by using that influence to help bring about change for the better in relation to people involved within our operations and supply chain.

Effectiveness of actions

Assessing the effectiveness of our actions

Computershare defines the effectiveness of our approach to Modern Slavery through:

- › **Identification:** By embedding Third Party Risk Management Framework.
- › **Monitoring:** While no internal audits specifically targeting modern slavery were conducted in 2025, Computershare undertook audits in related areas, including anti-money laundering, sanctions compliance, anti-bribery and corruption, employee screening, and technology procurement. These audit focus areas intersect with and reinforce key components of the modern slavery framework implemented by Computershare, contributing to a more robust and integrated approach to risk identification, assessment, and mitigation.
- › **Responsiveness:** Providing a consequence management framework that appropriately addresses modern slavery risk concerns with impacted parties.
- › **Collaboration:** By engaging in open dialogue to effect leverage and influence with suppliers, industry, investors, and government. An example of this included attending Pinnacle Groups Sustainability Webinars. These sessions help with building awareness and knowledge across value chains on Modern Slavery disclosures, which organisations continue to prioritise as an increasingly important part of their due diligence process when appointing third parties.

Computershare aims to update global policies, processes, and tools. This approach includes a strong focus on risk management, ensuring that these updates are comprehensive and effective. Additionally, Computershare is committed to listening to and understanding the range of stakeholder perspectives, including those of human rights experts and worker advocates.

Effectiveness of Management Approaches

We are continually improving our 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 have reviewed the effectiveness of our actions and tracked our performance in FY25 through the following measures:

Governance

Computershare has implemented a Modern Slavery Steering Committee which is the governance mechanism to ensure oversight of our Modern Slavery Statement Framework. This Committee, together with other forums, such as our Procurement and Environment, Social and Governance (ESG) Committees, assist in Computershare's commitment to ethical behaviour and actively log concerns around improper conduct.

As part of our modern slavery risk due diligence processes, we will continue to engage with our contractors and suppliers to understand what measures they have in place to support non-retaliatory grievance

mechanisms and effective remediation pathways. This includes requesting transparency on how workers can safely and anonymously raise concerns, and how those concerns are addressed without fear of reprisal.

Our Supplier Code of Conduct outlines expectations around ethical conduct and human rights, and we are enhancing our due diligence, onboarding and review processes to ensure suppliers either align with our standards or demonstrate equivalent policies and practices. Through targeted questionnaires, such as the Fair Supply SAQ, and ongoing supplier attestations, we are gathering insights into the maturity and effectiveness of grievance and remediation systems across our supply chain. These efforts are supported by our governance forums, including the Modern Slavery Steering Committee, and Procurement and ESG Committees, which oversee the integration of these expectations into our broader risk management framework.

We also offer the option to share knowledge with those suppliers to help them develop a remediation approach. We recognise that a legitimate remediation response is tailored to the particular facts of a situation. Additionally, Computershare is committed to listening to and understanding the range of stakeholder perspectives, including those of human rights experts and worker advocates.

EFFECTIVENESS OF ACTIONS

There have been no Human Rights Policy breaches in 24/25, however Computershare Issuer Services in Australia was engaged by the Human Rights Commission in relation to a visually impaired shareholder wanting to use our Investor Trade Platform to sell their shares.

When selling shares through the Investor Trade Platform, the participant is required to provide specific identification documents for the system to electronically verify the trade and to meet anti-money laundering obligations. As the participant did not have the requisite documentation of a driver's licence and a passport, the trade could not be processed using the Investor Trade platform.

The participant was advised that there were alternative processes for selling shares through a broker. Computershare's global Issuer Services business is looking to implement alternative measures of identification, including biometrics, which will help ensure that all participants will have access to the Trade Platform.

The high completion rates of our e-learning modules across all eligible staff (i.e. roles which have an elevated exposure to modern slavery risks in project delivery and contracting context), also indicates there is now greater awareness of modern slavery risk with our employees.

Computershare continues to develop our policies and standards around modern slavery, ESG, anti bribery and corruption, and anti money laundering, as well as ensuring that all staff attest to the Computershare Group Code of Conduct annually.

Reporting required by all reporting entities (with specific requirements to report on modern slavery) is completed under the oversight of the relevant boards of directors.

Monitoring

The actions undertaken to date in relation to our supply chain have improved the process of identifying, assessing and addressing modern slavery risk; and in FY25 we tracked the following measures:

Supply chain monitoring

- > Review of Top 300 supplier positions on Human Rights/Modern Slavery
- > Review of higher risk suppliers' positions on Human Rights/Modern Slavery
- > Continue to monitor and review 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 anonymous reports, should they become aware of, or suspect, reportable conduct.

The Whistleblower Program is promoted extensively internally, including in our Code of 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, an investigation is undertaken.

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 that 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 have 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.

EFFECTIVENESS OF ACTIONS

Measuring the effectiveness of our progress:

Key Metric	Objective	Action	Outcomes	Status
 <p>Embed frameworks, policies, standards and risk governance</p>	Continue to embed the Third-Party Risk Management Framework, including the supporting standards and the risk governance measures, and progress awareness training across our operating regions	Approval of the Third-Party Risk Management Framework	Closer alignment with the UN Guiding Principles approach to Human Rights.	Complete
		Creation of Third-Party Risk Management Standards	Updated Third Party Risk Management and Standard in multiple languages to enable improved accessibility of standards and provide more granular guidance.	Complete
		Consider an uplift of Modern Slavery training to include the new Third-Party Risk Management Framework	Improved understanding of the inter-connection between Third Party Risk Management and Modern Slavery	Not started
 <p>Integrating the Three Lines of Defence (3LoD) model</p>	1st Line of Defence accountabilities	Linking the business processes to risks and controls, as a key mechanism for the 1st Line to perform self-assessments of control effectiveness.	This process helps identify and evaluate risks and controls within their operations.	Ongoing
	2nd Line of Defence	The compliance programs monitor and test key topics such as Anti-Money Laundering (AML), Sanctions, and Anti-Bribery and Corruption (ABC), as referenced in the MS statement.	These Compliance risk assessments assess the operational effectiveness and design of key controls related to the Modern Slavery Statement.	Ongoing
	3rd Line of Defence	The third line provides independent assurance on the effectiveness of risk and control activities carried out by the first and second lines. It establishes a structured framework for evaluating risk management and control practices across these lines, ensuring consistency and rigor in assessment. Additionally, the third line reports to the Risk and Audit Committee, offering independent assurance on the adequacy and robustness of the overall risk and control framework.	These independent assurance programs or audits provide a comprehensive view of how various aspects of governance and compliance intersect with efforts to help prevent modern slavery.	Ongoing

EFFECTIVENESS OF ACTIONS

Key Metric	Objective	Action	Outcomes	Status
 <p>Responsible Third-Party Procurement Process</p>	<p>Progressively implement a global framework for the Responsible Third-Party Procurement Process</p>	<p>Implement a Third-Party Risk Management Framework which outlines Responsible Third-Party Procurement Process and helps ensure terms reflect the inherent and residual risk the Third-Party poses to Computershare</p>	<p>If a Third-Party fails due diligence by not meeting security, compliance or operational requirements, or poses an unacceptable risk, the engagement may be revoked.</p>	<p>In progress</p>
		<p>Third Party Due Diligence Initiative to increase supply chain transparency</p>	<p>Engage with relevant stakeholders to ensure that appropriate selection and onward management is conducted for all Third Parties.</p>	<p>In progress</p>
		<p>Supplier Portal Registration and Screening in the Fusion system has been implemented and there is an ongoing transfer of Third Parties to this central repository.</p>	<p>Move to the utilisation of the Fusion system as the global repository for Third Parties.</p>	<p>In progress</p>
 <p>Monitor, Measure and Manage</p>	<p>Continue to monitor and measure effectiveness of supply chain controls and progress supply chain risk mapping. In addition, while no internal audits specifically targeting modern slavery were conducted in 2025, Computershare undertook audits in related areas including anti-money laundering, sanctions compliance, anti-bribery and corruption, employee screening, and technology procurement. These audit focus areas intersect with and reinforce key components of the modern slavery framework implemented by Computershare, contributing to a more robust and integrated approach to risk identification, assessment, and mitigation.</p>	<p>Progress the implementation and adoption of Fusion as the central repository for Third Party management</p>	<p>Process improvements and operational consistency across our regions.</p>	<p>NA: Complete CA: Complete ANZ: Complete UK: Complete Ireland: Complete Jersey: Complete China: Not started South Africa: In progress Continental Europe: In progress</p>
		<p>Conduct regular Supplier Performance Reviews</p>	<p>Effective adoption and implementation of globally prescribed policies and frameworks.</p>	<p>Under review</p>
		<p>Assess and monitor the risk and control frameworks across the business processes and ensure that there is alignment with the policy frameworks</p>		<p>Ongoing annual reviews across the business, which are also independently assessed by the third line of defence.</p>
 <p>Collaboration</p>	<p>Collaborate with key suppliers and stakeholders to promote industry best practices addressing widespread modern slavery risks</p>	<p>Participate in the Social Responsibility Alliance Membership of the UN Global Compact Network</p>	<p>Collaborative efforts help empower significant influence and leverage to address modern slavery risks in the third-party risk management framework as well as internally, fostering systemic changes for enhanced supply chain transparency.</p>	<p>Ongoing</p>

Looking ahead

Our modern slavery program will continue to support our ongoing commitment to ESG and effective management of modern slavery risk across our operations and supply chain. We will continue to focus on the following as priority items to underpin our future endeavours in this important area.

- › Expanding the coverage and oversight of our active supplier base, helping create transparent and traceable supply chains with a continuous focus on supplier compliance with our Supplier Code of Conduct.
- › Improving our due diligence assessment governance to align with a more robust vendor management function.
- › Monitoring critical/high risk supplier posture, including supplier collaboration and remediation actions when applicable.

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 and supply chain. This Statement demonstrates that we are serious about implementing and enforcing effective systems and controls across our business and supply chain in support of these commitments.

We will continue to build on the efforts of FY25, both within our own organisation and in our ongoing working relationships with our suppliers.

Appendix

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.

Global Code of Conduct	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.
Global Human Rights Policy	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.
Fairness and Culture Policy	We are committed to fairness and belonging for everyone. Our goal is for every team member, customer, and supplier to feel valued. We will make every effort to ensure that our organisation is welcoming to all by eliminating barriers and obstacles; and enforcing a zero-tolerance policy toward any form of discrimination.
Whistleblower Policy	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.
Anti-Bribery & Corruption Policy	Computershare 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.
Global Sanctions Policy	It is essential that Computershare is in compliance with applicable legal and regulatory requirements related to economic and trade sanctions. This policy outlines Computershare's commitment to remaining in compliance with these requirements and to reduce or eliminate the exposure of Computershare's businesses, entities and employees to risks from sanctioned countries, entities and individuals.
Environment, Social and Governance Policy	Computershare manages ESG risks by conducting our business in a way that enables us to continue being successful and profitable, while balancing our needs with those of our employees, clients, suppliers, shareholders, communities, and environment.
Modern Slavery Remediation Policy	The purpose of this document is to provide steps for Computershare to apply in the event that it becomes aware of an instance of modern slavery within either its own business or that of its suppliers.

Appendix B

Section number	Name
Section 1	Introduction
Section 2	Our progress
Section 3	Identifying the reporting entities
Section 4	Structure, operations and governance
Section 5	Our supply chains
Section 6	Modern Slavery risks in the operations of entities covered by this statement
Section 7	Remediation
Section 8	Effectiveness of actions
Section 9	Looking ahead

Australian Modern Slavery Act (Mandatory reporting requirements)	Reference in this Statement	UK Modern Slavery Act (Mandatory reporting requirements)	Canada Modern Slavery Act
Identify the reporting entity	Section 3	Identification of entity with reporting obligations (s. 54(2))	Identification of entity with reporting obligations (s.c.2023, c.9 part 2 11(1))
Describe the reporting entity's structure, operations and supply chains	Section 4 Section 5	Organisation structure, business and supply chains (s. 54(5) (a))	Organisation structure, activities and supply chains (s.c.2023, c.9 part 2 11(3) (a))
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls	Section 6	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))	Parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk ((s.c.2023, c.9 part 2 11(3) (c))

APPENDIX

Australian Modern Slavery Act (Mandatory reporting requirements)	Reference in this Statement	UK Modern Slavery Act (Mandatory reporting requirements)	Canada Modern Slavery Act
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 6 Section 7 Section 8 Appendix A	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)) 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))	Organisation's measures it has taken to remediate any forced labour or child labour ((s.c.2023, c.9 part 2 11(3) (d)) Organisation's policies and its due diligence processes in relation to forced labour and child labour ((s.c.2023, c.9 part 2 11(3) (b))
Describe how the reporting entity assesses the effectiveness of such actions	Section 8	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))	How the Organisation assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains ((s.c.2023, c.9 part 2 11(3) (g))
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 3 Section 4	N/A	N/A
Information that the reporting entity, or the entity giving the Statement, considers relevant.	Section 1 Section 9	N/A	N/A
N/A	Section 6	N/A	Organisation's training it has provided to employees on forced labour and child labour ((s.c.2023, c.9 part 2 11(3) (f))
N/A	Section 6	N/A	Organisation's measures it has taken to remediate the loss income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains ((s.c.2023, c.9 part 2 11(3) (e))