

# WiseTech Global Modern Slavery Statement 2022

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## INTRODUCTION

The Australian *Modern Slavery Act 2018* (Cth) and the United Kingdom's *Modern Slavery Act 2015* ("**Modern Slavery Acts**") require certain entities to report annually on the risk of modern slavery in their operations and supply chains, and the actions undertaken to address those risks.

This statement is made jointly by WiseTech Global Limited (ACN 065 894 724) and WiseTech Global (Australia) Pty Ltd (ACN 112 936 991) for the purposes of the Australian *Modern Slavery Act 2018* (Cth), and WiseTech Global Limited and WiseTech Global (UK) Limited for the purposes of the United Kingdom *Modern Slavery Act 2015* ("**Modern Slavery Acts**") ("**Statement**"). Unless otherwise stated, figures quoted in this Statement are valid as at 30 June 2022. Although this Statement is only required for the aforementioned reporting entities, it also applies to all of WiseTech Global Limited's subsidiary entities spread around the world (together referred to as "**we, us, our, WiseTech**").

WiseTech is a leading provider of software solutions to the logistics industry globally. We are united in our mission to create breakthrough products that enable and empower those that own and operate the supply chains of the world. We provide our solutions to over 18,000 customers in over 165 countries, including 24 of the Top 25 Global Freight Forwarders and 41 of the Top 50 Global Third-Party Logistics Providers<sup>1</sup>.

In March 2021, we published our first modern slavery statement ("**FY20 Statement**") outlining the policies and processes implemented by WiseTech to identify and address modern slavery and human trafficking risks within our operations and supply chain. This Statement provides an update on our progress to 30 June 2022 (**Reporting Period**) and our plans for further improvements in next financial year ending 30 June 2023.

## Our structure

WiseTech Global Limited is an Australian public company listed on the Australian Securities Exchange (ASX: WTC). WiseTech is headquartered in Sydney, Australia and encompasses approximately 81 entities across 35 locations globally. A complete list of the entities that comprise WiseTech as at 30 June 2022 is contained in our 2022 Annual Report available at: <https://www.wisetechglobal.com/investors/annual-reports/>.

At WiseTech, our procurement and human resources functions are largely centralized at our Sydney headquarters, which provides us with greater visibility over our supply chain and workforce.

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<sup>1</sup> Armstrong & Associates: Top 50 Global 3PLs & Top 25 Global Freight Forwarders ranked by 2021 gross logistics revenue/turnover and freight forwarding volumes – updated 4 August 2022

## Our operations

Our industry leading flagship technology, CargoWise, is a deeply integrated, global software platform that enables logistics service providers to execute highly complex logistics transactions and manage their operations on one database across multiple users, functions, offices, corporations, currencies, countries and languages.

As at 30 June 2022, we had a headcount of 1979 people globally located in 50 offices worldwide, including 35 development centers, in locations such as Australia, the United States, Europe, Turkey, Canada, China, South America, Singapore, South Korea and South Africa.

In addition to CargoWise, we own and operate a number of subsidiaries in these regions operating other brands, with further information available at <https://www.wisetechglobal.com/what-we-do/our-businesses/>.

We currently operate our own data centres in Australia, Germany and the United States. These data centres host our CargoWise solution, which is accessed directly by customers through the cloud. Our data centres also host services that relate to software development and product improvements.

As set out below, most of our external spend relates to services, equipment and facilities to support the internal operations of a software business.

## OUR GOVERNANCE FRAMEWORK

### Our values

Our values are the foundation of our culture. They define who we are, how we work and what we stand for:

- We continuously improve our culture so that it empowers and drives us.
- We work hard to improve ourselves, our teams, our products and our business.
- We have a clear purpose and a shared vision for everything we do.
- We invent things our customers cannot live without.
- We lead when we see the need and inspire and support each other always.
- We focus on the deeper needs of real customers in our chosen markets.
- We strive for excellence at all times and in everything we do.
- We manage ourselves and are always focused on results.

### Our Code of Conduct

Our Code of Conduct outlines the ethical standards expected of all our directors, employees, contractors, sub-contractors, consultants and any individual performing work for WiseTech. WiseTech is committed to maintaining ethical standards in how we conduct our business activities and stakeholder relationships. WiseTech's reputation as an ethical business organisation is important to our ongoing success.

## **Our Supplier Code of Conduct – Labour (“Labour Code”)**

Our Labour Code outlines our expectation that all our suppliers conduct their business activities in an ethical, lawful and socially responsible manner and comply with all applicable anti-slavery and human trafficking laws.

### **Other policies**

In addition to those above, we have implemented a number of other policies to ensure that our employees and all parties acting for us, or on our behalf, maintain the highest ethical standards in relation to our business. These include:

- **Human Rights Principles**

Our Human Rights Principles set out our commitment to upholding and respecting human rights for all people as articulated in the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work. It defines our commitments including providing a safe and healthy workplace, complying with local employment laws and regulations and not engaging or supporting the use of forced or compulsory labour. These principles apply across our global businesses and must be adhered to by our employees, contractors, directors and consultants and by all parties acting for us, or on our behalf, including our partners and suppliers.

- **Anti-Bribery and Corruption Policy**

WiseTech is committed to conducting our business activities in an ethical, lawful and socially responsible manner, and in accordance with the laws and regulations of the locations in which we operate. Our Anti-Bribery and Corruption policy reinforces this and prohibits our people and those who represent us from engaging in any activity which constitutes bribery or corruption.

- **Whistleblower Protection Principles**

Our global Whistleblower Protection Principles establish mechanisms and procedures to report suspected unethical or illegal conduct, including any modern slavery concerns, in a manner which protects the whistleblower and gathers the necessary information for us to fully investigate such reports and act appropriately. These global principles are supplemented by our comprehensive Australian Whistleblower Policy. A copy of our Code of Conduct and the additional policies and principles mentioned above are available at <https://www.wisetechglobal.com/investors/corporate-governance/>.

- **Risk Management Principles**

We view risk management as a continual process, integral to achieving our corporate objectives, effectively managing our assets and creating and maintaining shareholder value.

The identification and proper management of risk is an important priority of the Board and Management. In developing a culture of risk management, each manager within our global businesses is responsible for appropriate responses to manage risk.

Additionally, we have created a dedicated Risk Committee, chaired by our CEO and comprising senior executives, to provide our Board with assurance that major business risks are being identified and consistently assessed.

Our Risk Management Principles set out this approach and are available at <https://www.wisetechglobal.com/investors/corporate-governance/>.

## **Our Modern Slavery Incident Response, Management and Remediation Framework**

Our Modern Slavery Incident Response, Management and Remediation Framework is published on our intranet and sets out what WiseTech will do if an instance of modern slavery is suspected or identified in our operations or supply chain.

Our aim is to work collaboratively with our suppliers to mitigate any modern slavery risks. Where we identify risks or issues with potential or current third party suppliers, we will take appropriate measures to ensure corrective actions are implemented that are consistent with our remediation plan.

We will remediate any instances identified, with a focus on minimizing the impact on any potential victims. In some circumstances (e.g., if the supplier fails to cooperate with us) we will engage with senior management of that supplier and may suspend or terminate that supplier arrangement.

## **OUR SUPPLY CHAIN**

### **Nature of supply chain**

Our largest categories of supplier spending globally relate to:

- software licences;
- professional/consulting services, including audit services as well as tax and legal advice; and
- our data centres, including hardware, procurement and security services.

In addition to the above, common spend categories include office leases and facilities services (such as cleaning and foodstuffs) and utilities. Travel related expenditure has been reduced in recent years due to local and international travel restrictions.

### **Geography**

In FY22, we engaged directly with over 2500 suppliers from approximately 50 different countries. Our top 50 suppliers accounted for approximately 63% of our total FY22 spend. 47 of our top 50

suppliers (by spend) were located in Australia, the United States, the United Kingdom or Europe<sup>2</sup>. The remaining three were located in India and South Africa.

## Risk of modern slavery practices

We consider the risk of modern slavery in our global operations and supply chain to be relatively low based on the location of our suppliers, the nature of the goods and services we acquire and the highly technical nature of our business as a software company.

However, we also acknowledge that the risk of modern slavery in our operations and supply chain is one that requires constant vigilance, particularly in the following risk areas:

- **Hardware manufacture** – whilst most of our hardware providers are located in lower risk jurisdictions, we do have some suppliers located in India that, according to the Global Slavery Index (“GSI”)<sup>3</sup>, may have a higher prevalence of migrant labour or vulnerable workers;
- **Cleaning and facilities support** – given the nature of work in this sector and the frequent use of less skilled or migrant labour, the inherent risk of labour exploitation is high; and
- **Outsourcing** – as a general practice we tend to contract with service providers directly, however in the instances where this is not possible or feasible, we will necessarily have less visibility over the terms and conditions governing outsourced workers.

## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

### Supplier due diligence

During FY21 we expanded our due diligence beyond the processes previously in place and contacted the following suppliers:

- suppliers based in higher risk jurisdictions (defined as those in jurisdictions given a GSI ranking of 100 or less)
- suppliers in the cleaning industry (identified as being one of the highest risk suppliers to WiseTech, irrespective of location); and
- our top 50 suppliers by spend during FY21 (regardless of location).

This selection of suppliers reflects both a quantitative and qualitative risk assessment and meant that we contacted over 75 suppliers in locations including India, Malaysia, Philippines, Singapore, Turkey, South Korea, and South Africa.

We asked these suppliers to respond to a series of questions which included:

- what policies and procedures they have in place to ensure compliance with employment laws and regulations;

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<sup>2</sup> Comprising: Belgium, Bulgaria, Denmark, Finland, Germany, Ireland, Iceland, Italy, the Netherlands, Norway, Poland, Portugal, Spain, Sweden and Switzerland.

<sup>3</sup> <https://www.globallslaveryindex.org/>

- whether they have a centralized human resources function that manages the recruitment and onboarding of all new employees;
- how they monitor compliance with modern slavery policies;
- whether they have a whistleblowing mechanism in place which would enable employees to raise modern slavery concerns on an anonymous basis;
- whether all their employees are provided with a formal contract of employment and are free to resign from such employment at any time without penalty; and
- whether they have ever been investigated for breach of any employment laws or regulations.

We also asked these suppliers to sign and return a copy of our Labour Code (available on the Corporate Governance section of our website here:

<https://www.wisetechglobal.com/investors/corporate-governance/>)

We received a 100% response rate on our survey and signed Labour Codes from suppliers in higher risk jurisdictions. Half of our top 50 suppliers (by value) either responded in time to our survey or have Modern Slavery group policies published on their website.

None of the survey responses we received gave rise to a concern that any of the contacted suppliers were at high risk of modern slavery, or that it was necessary for us to conduct further investigations into that supplier.

Since there are inherent weaknesses with relying on suppliers completing a self-assessment, we will continue to build on more sophisticated ways to assess modern slavery risk going forward, including via Risk Assessment exercises to be conducted via our new cross-functional Modern Slavery Working Group.

## **Training and improved awareness**

During FY22, we worked to ensure that everyone at WiseTech is aware of the practices that constitute modern slavery, is able to recognise modern slavery risks and understands the process for conducting due diligence of our suppliers and for reporting suspicious behaviour. We rolled out mandatory online training to all our staff members via our WiseTech Academy platform. In recognition of WiseTech having employees based globally, we have translated the training materials into 12 languages and will make these available in FY23. We are pleased that approximately 95% of our people successfully completed the training and quiz in this Reporting Period.

In order to cement awareness of modern slavery risk in our business and provide all modern slavery resources in one place, we have created a dedicated specific section on our global intranet which explains what modern slavery is and provides a link to our Remediation Framework, Labour Code, Purchasing Principles, training and quiz.

## **Purchasing Principles**

We updated and rolled out our internal purchasing principles to key decision makers in our business. These principles supplement the online training and remind all employees involved in procurement activities of our modern slavery obligations and the expectation that our suppliers conduct their business in compliance with all applicable laws and regulations.

## **Additional actions**

Other actions we have taken include the following:

- We have established a dedicated, cross-functional Modern Slavery Working Group comprising representatives from our ESG, Legal, Procurement and Risk Management & Internal Audit teams.
- Our modern slavery training and quiz is part of mandatory onboarding processes for new employees, and we have made improvements to our training cycles to ensure that the training is re-run every year for existing employees.
- We continue to roll out specific clauses in our supply contracts requiring compliance with our policies and codes of conduct, including those relating to modern slavery.

There were no reports of any suspected or identified modern slavery incidents during FY22, so we have not had cause to refine our Remediation Framework as a result of any learnings. However, we will continue to ensure that it remains up to date and appropriate for ensuring the prompt identification and escalation of any modern slavery incidents. We recognize that addressing modern slavery risk is an ongoing process that must be constantly reviewed and refined. We are focused on continuing our efforts in mitigating the risk of modern slavery in our operations and supply chain.

## **ASSESSING OUR MEASURES**

In order to assess the ongoing effectiveness of the actions described above, our modern slavery working group will continue to work together to review the policies and processes in place to consider whether we are appropriately identifying and evaluating our modern slavery risks.

To the extent that potential improvements to our policies are identified, appropriate updates will be made.

## **CONSULTATION WITH CONTROLLED ENTITIES**

A large portion of WiseTech's procurement and contract management processes is managed out of our Sydney headquarters, and we have implemented requirements that supplier agreements be reviewed centrally by our headquarters team prior to execution. This Statement has therefore been prepared in consultation with the procurement team in Sydney, along with other members of our Modern Slavery Working Group.

The management and employees of our subsidiaries are also required to undertake the mandatory Modern Slavery training and quiz referred to above (upon commencement for new employees, and annually for existing employees).

## APPROVAL OF THIS STATEMENT

This Statement has been approved by the Board of Directors of WiseTech Global Limited and WiseTech Global (UK) Ltd.



Richard White, Executive Director & Chief Executive Officer

20 December 2022