

**BlackRock**<sup>®</sup>

# **Australia Modern Slavery Statement**

For the year ending 31 December 2023

**BlackRock Investment Management (Australia) Limited**  
(ABN 13 006 165 975, Australian Financial Services Licence No. 230523)

**BlackRock Australia HoldCo Pty Ltd** (ABN 22 139 463 693)

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# 1 Reporting entities in Australia

This Modern Slavery Statement is prepared to comply with section 16 of the Modern Slavery Act 2018 (Cth) (the **Act**) in respect of the financial year ending 31 December 2023 (**Statement**). References to **BlackRock Australia** mean the two entities making this Statement, namely:

- **BlackRock Investment Management (Australia) Limited** (“**BIMAL**”), ABN 13 006 165 975, Australian Financial Services Licence No. 230523); and
- **BlackRock Australia HoldCo Pty Ltd** (ABN 22 139 463 693)

The BlackRock Australia entities are wholly owned subsidiaries of BlackRock, Inc. which is a publicly traded company on the New York Stock Exchange. References in this Statement to “**BlackRock**” or “**We**”, “**Our**”, “**Us**” refer to BlackRock’s global business and therefore include the BlackRock Australia entities.

This Statement has been prepared as a joint Statement as permitted by section 14 of the Act.

## 2 BlackRock in Australia – our business and structure

BlackRock Australia HoldCo Pty Ltd is the holding company of BlackRock Investment Management (Australia) Limited. As a holding company, it does not conduct any business activities and has no employees.

BlackRock Investment Management (Australia) Limited:

- a) is an Australian public company and licensed provider of financial services in Australia;
- b) as at 31 December 2023, had 174 employees in Australia (it also utilises the support of a wide range of staff employed by affiliate companies within BlackRock, Inc including, but not limited to, offices in India, the United States, Hong Kong and Singapore); and
- c) does not currently own or control any entity which has a consolidated annual revenue of at least AUD\$100 million.

BlackRock Australia is a financial services company offering investment services and solutions to a range of institutional investors, financial professionals and individuals in Australia and New Zealand. Our purpose is to help more and more people experience financial well-being. We focus on the long-term sustainability of BlackRock to continue delivering value to our clients, employees, and the broader community. By integrating environmental, social and governance (ESG) practices into our investment processes in line with client preferences, and creating a positive social impact by serving communities in Australia, we are dedicated to helping our clients, employees, shareholders and communities achieve financial well-being.

# 3 BlackRock Australia's potential exposure to modern slavery risks

This Statement seeks to describe the risk-based approach taken by BlackRock Australia to address any potential modern slavery risk in its employment, supply chain and/or investment management practices. Modern slavery comprises trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

## OPERATIONS

### Employees

BlackRock Australia's staff fill professional and administrative roles that are based in Australia. In common with all BlackRock, Inc., employees in the countries in which it operates, BlackRock Australia's employees have the benefit of contractual entitlements, as well as various policies and procedures, to protect their rights. Accordingly, as a financial service provider with a professional workforce, BlackRock Australia considers that as an employer its risk as it relates to employee practices exposure is low.

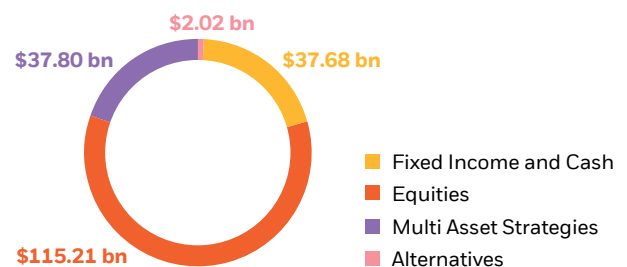
### Investment Activities

In 2023, BlackRock Australia was entrusted to manage AUD\$192.70 billion assets under management, comprised of the following asset classes/strategies as shown in Figure 1:

On behalf of its clients, BlackRock Australia invests broadly in most asset classes and across the globe. Though modern slavery may occur anywhere, there are heightened risks in certain industries (including construction and infrastructure, manufacturing, mining and agriculture and food processing) and jurisdictions<sup>1</sup>. Our investments in these high risk industries and jurisdictions may link us to modern slavery. We have a variety of processes to manage that risk.

Risk management, including Environmental, Social and Governance (ESG) related matters is core to BlackRock Australia's investment approach. As a predominately index investor with a fiduciary and long-term mindset, we - through our BlackRock Investment Stewardship (BIS) team - advocate for sound corporate governance and business practices that support long-term value creation and assess a range of factors that can affect the sustainable financial performance of companies in which we invest on behalf of clients.

Figure 1: BlackRock Australia Total AUM



as at 31 December 2023

1. For example see the Global Slavery Index and the US Government List of Goods Produced by Child Labor or Forced Labor.

As part of its activities (further detailed below), the BIS team encourages companies to implement processes to identify, manage, and prevent adverse human rights impacts that are material to their business and provide robust disclosures on these practices. Many of the companies in which we (on behalf of our clients) invest in Australia are themselves subject to the mandatory reporting requirements of the Act.

## **Real Estate**

To facilitate investment of capital on behalf of offshore funds managed by BlackRock, Real Estate employees of BIMAL facilitate the creation of special purpose vehicles (SPVs) which acquire, manage and dispose of Real Estate assets. Head of Investments for BlackRock APAC Real Estate and/or Head of Real Estate for BlackRock Australia are generally appointed as Director(s) of Trustee companies and sit on the Board of these SPVs. Assets can be acquired with or without the involvement of a joint venture partner.

Where the investment is acquired wholly on behalf of capital managed by BlackRock, asset management functions are entirely coordinated by BIMAL employees including appointment of a third- party property manager to manage day-to-day property operations; being activities more commonly understood to give rise to modern slavery risk.

If an investment is made in joint venture with third party capital, the joint venture partner generally coordinates asset services including appointment of a property manager as an integrated internal service or via a professional third party.

## **Climate Infrastructure**

BlackRock funds own portfolio companies which hold Climate Infrastructure assets. The funds may hold minority or majority interests in the companies. BIMAL Climate Infrastructure team is responsible for sourcing these opportunities and, once acquired, overseeing the execution of their agreed business plans, prior to their disposal. The operation of these companies is the responsibility of the management team appointed in relation to them; as such the management team is responsible for the appointment and management of staff and suppliers; which activities give rise to modern slavery risk. By virtue of its ownership interest, and hence board positions held, BIMAL exercises an oversight role in relation to this management team.

## SUPPLY CHAIN

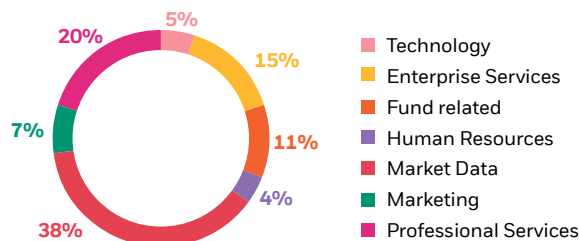
BlackRock Australia seeks to identify the risk of modern slavery practices in its supply chain by using the industry methodology adopted by the International Labour Organisation<sup>2</sup> (ILO).

In 2023, BlackRock Australia spent approximately AUD\$40 million on goods and services across 192 suppliers. Of that spend, approximately 58 % related to goods and services pertaining to Market Data and Professional Services industries (see Figure 2) which, similar to BlackRock Australia, are

comprised of predominantly a professional workforce within the financial services industry, which inherently has low exposure to modern slavery risks.

Facility services, cleaning services, security, promotional and/or merchandising items and IT hardware are examples of goods and services considered as having higher exposure risk to modern slavery. These generally fall into the supplier industry under Enterprise Services or Technology, which make up approximately 15% and 5% respectively (see Figure 2) of BlackRock Australia's 2023 annual supplier spend. Section 4E - Suppliers (Third Party Vendors) - further discusses our approach to managing modern slavery risks in our supply chain.

**Figure 2: Spend by Supplier Industry**



as at 31 December 2023

2 Methodology of the global estimates of modern slavery: Forced labour and forced marriage - International Labour Office (ILO), Geneva, 2017.

# 4 How BlackRock Australia assesses and addresses modern slavery risks

## A. Governance policies

BlackRock Australia assesses and addresses the risks of modern slavery practices in its operations and supply chains through an established set of policies and procedures that govern the way it operates as part of the BlackRock group of companies. These policies and procedures include:

POLICY	PURPOSE
<b>Code of Business Conduct and Ethics</b>	All employees are expected to comply with BlackRock Inc’s Code of Business Conduct and Ethics which sets out basic principles designed to guide our employees, officers and directors. All employees, officers, and directors must conduct themselves in accordance with this Code and seek to avoid even the appearance of improper behaviour.
<b>Supplier Code of Conduct &amp; Ethics</b>	<p>BlackRock, Inc’s Supplier Code of Conduct &amp; Ethics details expectations of its suppliers in relation to human rights, inclusion &amp; diversity, environmental sustainability and ethics. In particular, it provides that suppliers:</p> <ul style="list-style-type: none"> <li>• Fully comply with all applicable child labour laws and only employ workers who meet the minimum legal age for that jurisdiction. Where local laws are less stringent than the ILO minimum age convention, BlackRock expects Suppliers to comply with ILO standards.</li> <li>• Not to use any involuntary labour, such as slave, forced, bonded, indentured or prison labour and not be involved in any human trafficking or exploitation.</li> </ul>
<b>Global Policy for Reporting Potential Illegal or Unethical Conduct</b>  <b>Australian Whistleblower Protection Procedure</b>	<p>BlackRock Inc’s Global Policy for Reporting Potential Illegal or Unethical Conduct and more specifically, the Australian Whistleblower Protection Procedure allows for BlackRock employees and associated third parties to report any potential illegal or unethical conduct about which they become aware (for example, any instance of suspicion of modern slavery or human trafficking). All reports made in compliance with the policy may be made without fear of dismissal and/or retaliation of any kind. Reports can be made via a range of channels including:</p> <ul style="list-style-type: none"> <li>• Business Integrity Hotline</li> <li>• Business Integrity Reporting Website</li> </ul>
	<p>The Business Integrity Hotline and the Business Integrity Reporting Website are administered on behalf of BlackRock by an independent external third party.</p>

## **B. Financial Crime – AML / CTF Framework**

BlackRock Australia recognises that criminals seek to exploit vulnerabilities within the financial sector to disguise illicit funds and enable other serious crimes such as terrorism, slavery, drug trafficking, child exploitation, fraud, tax evasion and corruption. BlackRock Australia is committed to combating such crimes by implementing a risk-based framework which seeks to ensure adherence to relevant Anti-Money Laundering (**AML**), Counter-Terrorism Financing (**CTF**) and sanctions laws and regulations, as well as operating an Anti-Bribery and Corruption program.

## **C. Investment stewardship**

As a key investment function, BlackRock's BIS team engages with management teams and/or board members of listed companies which BlackRock invests in on behalf of investors on material business issues including sustainability related matters and, for those clients who have given it authority, through voting proxies in the best long-term economic interests of our clients. BIS also participates in the public debate to shape global norms and industry standards with the goal of a policy framework consistent with our clients' interests as long-term shareholders.

We are committed to transparency in the stewardship work we do on behalf of clients. We inform clients about our engagement and voting policies and activities through direct communication and through disclosure on our website. Each year we publish an annual Investment Stewardship Report as well as quarterly stewardship reports which provide a global overview of our investment stewardship engagement and voting activities during the quarter and calendar year, including market developments, speaking engagements, and engagement, and voting statistics. Additionally, we make public our market-specific voting guidelines for the benefit of clients and companies with whom we engage. We also publish commentaries to share our perspective on market developments and emerging key themes.

In this way, we help inform our clients about the work we do on their behalf in promoting the governance and business practices that support long-term sustainable value creation.

For further information, please see:

**<https://www.blackrock.com/corporate/about-us/investment-stewardship>**



## **Investment stewardship – Our approach to engagement on corporate Human Rights risks**

BIS encourages companies to have sound corporate governance and business practices that support the long-term, durable value creation that our clients depend on to achieve their financial goals. As part of our fiduciary responsibilities as an asset manager to act in our clients' best interests, we assess a range of risks and opportunities that can affect the financial performance of the companies in which we invest on their behalf. We engage companies to understand their approach to the material drivers of risk and value in their business models, provide feedback and raise any concerns. We may signal continuing concerns through our voting, where clients have authorized us to vote on their behalf. We vote to advance the long-term financial interests of our clients as shareholders.

Unmanaged potential or actual adverse human rights issues can expose companies to significant legal, regulatory, operational, and reputational risks. These risks can materialize in a variety of ways, from fines and litigation to workforce and supply chain disruptions that may damage a company's standing with business partners, customers, and communities.

We believe long-term investors benefit when companies implement processes to identify, manage and prevent adverse human rights impacts that could expose them to material risks, and provide robust disclosures on these processes.

BIS engages with companies on how they manage the human rights issues that are material to their businesses and monitor the effectiveness of their human rights practices on a best-efforts basis. We are focused on the governance of this business risk, where appropriate. We do not, and are not in a position to, advise or direct companies in how they identify, manage and mitigate human rights-related risks.

For further information regarding Human Rights as an Investment Issue and How We Engage with Companies on Corporate Human Rights Risks, please see <https://www.blackrock.com/corporate/literature/publication/blk-commentary-engagement-on-human-rights.pdf>



## Case Study

### Hyundai Motor Co., Ltd

#### Background

Hyundai Motor is an automaker headquartered in Seoul, South Korea. In July and December 2022, multiple media outlets reported that Hyundai Motor's suppliers based in the U.S. employed underaged children.

#### BIS Activity

BIS engaged with Hyundai Motor multiple times throughout 2023 to address governance mechanisms, board oversight and risk management surrounding the child labour controversy.

#### Outcome

Through BIS's activity engagement, Hyundai Motor published a shareholder letter addressing its position on the child labour controversy, as well as a summary report on its audit of labour practices of Tier 1 suppliers used by the company. Additionally, Hyundai Motor made enhancements to its supply chain procurement and monitoring processes, including introducing independent audits of suppliers. Hyundai Motor also confirmed that their suppliers have terminated relationships with third party staffing agencies who falsely certified that they had screened for underaged workers.

## **D. EMPLOYEES (BLACKROCK'S HUMAN CAPITAL)**

### **Employee vetting**

We have written policies in place which provide for background screening and identity checks for current and prospective employees.

For all new employees in Australia (including temporary hires), offers of employment are contingent upon the outcome of pre-employment checks, which include age verification and right to work.

### **Culture and Principles**

BlackRock Australia believes that developing a strong corporate culture is an important component of its human capital management practices and critical to long-term success.

All employees are expected to comply with BlackRock's Code of Business Conduct and Ethics (the **Code**) which sets out basic principles designed to guide our employees. All employees must conduct themselves in accordance with this Code and seek to avoid even the appearance of improper behaviour. Our employees have a personal responsibility to immediately report illegal or unethical behaviour and a free confidential phone number is readily available on the intranet homepage to allow them to easily do so.

### **Training, Innovation and Development**

We are committed to innovation, learning and reinvention in all areas of our business and believe that developing the capabilities of our employees is integral to delivering long-term value. To that end, our human capital management practices are designed to provide opportunities for employees to learn, innovate and enhance their skillsets at every stage of their career. These opportunities, which include a comprehensive online suite of interactive resources and courses (**BlackRock Academies**), play an important role in engaging our employees.

BlackRock Inc's Code is available on our website. The Code is supported by separate employee conduct policies and programs and reinforced through employee training. Every year, our employees complete mandatory compliance training that includes the Code as well as the Global Policy for Reporting Illegal and Unethical Conduct.

## E. SUPPLIERS (THIRD PARTY VENDORS)

As a participant of the United Nations Global Compact (**UNGC**)<sup>3</sup>, BlackRock considers methods to implement practices that align its operations with universal principles on human rights, labour, environment, and anti- corruption. BlackRock has established expectations for the companies and individuals (Suppliers or Vendors) who supply goods, materials, or services to BlackRock to adhere to these same standards and principles, or their equivalent.

We depend on a number of key Suppliers for various fund administration, accounting, custody, market data, technology and operational needs. We also engage Suppliers for building facility services and management, stationery and office supplies, cleaning of premises and for catering purposes. These are subject to the standards, policies and processes described below.

### Supplier Management Framework

We maintain a global framework of internal policies including a Sourcing and Vendor Management (SVM) Policy and a Third-Party Risk Management Policy. Collectively, this supplier management framework, ensures BlackRock has clear roles and responsibilities and effective oversight and management of Suppliers and Vendors.

### Supplier Code of Conduct & Ethics

BlackRock has a **Supplier Code of Conduct & Ethics**, which details our expectations and standards of all our Suppliers in relation to human rights, diversity, equity and inclusion, environmental sustainability, and integrity, ethics, and anti-corruption in their management practices. This Supplier Code of Conduct was last reviewed and updated in October 2023. As part of the vendor onboarding process, new Suppliers are issued with a copy of the Supplier Code of Conduct & Ethics and are asked to confirm they abide by our standard prior to working with BlackRock.

In addition, our key contract templates incorporate a requirement that suppliers comply with all applicable laws and regulations in the conduct of their business, including in relation to human rights and modern slavery. Suppliers must notify BlackRock immediately if there have been any potential or confirmed offences relating to human trafficking and/or slavery, and are required to act quickly to take corrective actions, as appropriate.

### Sanctions Screening

We screen Suppliers against Sanctions Lists<sup>4</sup> prior to an initial payment to them if payments are made through our Business Spend Management Software. We prohibit engaging in commercial arrangements or making payments to: 1) entities or individuals on Sanctions Lists; or 2) entities owned or controlled by entities or individuals on Sanctions Lists.

Our policy is to include sanctions screening obligations in all relevant newly negotiated or revised agreements and contracts on a risk basis where a third party is acting on our behalf or on behalf of our funds as an outsourced service provider, including agreements with transfer agents, shareholder service providers, distributors, and property managers.

<sup>3</sup> UN Global Compact is a principle-based framework for businesses. The Ten Principles of the United Nations Global Compact are available at: <https://www.unglobalcompact.org/what-is-gc/mission/principles>.

<sup>4</sup> BlackRock complies with Sanctions (including in its relationships with clients, counterparties, partners, contractors, agents, vendors and employees) of the United States ("US"), as administered and enforced by the US Treasury Department's Office of Foreign Assets Control ("OFAC") and other agencies, the European Union ("EU"), the United Nations Security Council ("UN") and other applicable jurisdictions, including lists of sanctioned individuals, entities, and governments that are compiled and distributed by governments that implement Sanctions (collectively, "Sanctions Lists").

## **Supplier Due Diligence**

For those goods/services that may be at a high(er) risk for modern slavery, including underpayment or exploitation of vulnerable workers, we ask those suppliers to complete a due diligence questionnaire.

There is a dedicated Corporate Sustainability resource responsible for monitoring and reviewing completed due diligence questionnaires and assessing for any indication of modern slavery practices.

In addition to the above we also continue to explore the use of third-party data feeds and monitoring solutions to help identify modern slavery risks in real time.

## **F. Real Estate**

BlackRock Australia's Real Estate team undertakes due diligence in relation to property managers appointed – including issuing a property manager questionnaire, adopting a risk filter assessment in relation to them, and applying screening functionalities (such as financial crime) within a third-party due diligence platform.

Property managers appointed by BlackRock Australia and/or JV partner utilise contracts that contain financial crime and modern slavery provisions. There is also provision for BlackRock Australia or its JV partner to conduct either desktop based or site based due diligence as and when appropriate. To date, BlackRock Australia has not had to enact on these provisions.

As joint venture owners and directors of the SPVs, BlackRock Australia is able to exert influence in relation to areas such as procurement and supply chain management and raise concerns (such as observations on modern slavery risks).

Finally, JV partners are vetted prior to engagement where reviews are undertaken in relation to their cost control, cash handling (although cash transaction shall be minimal), systems & processes and financial crime.

## **G. Climate Infrastructure**

Where the BlackRock fund holds a majority interest in the entity, the oversight it exercises is greater– for example in relation to strategic decision making, and taking responsibility for board reserved matters, as compared to where they hold a minority interest only.

In exercising this oversight, and opining on board reserved matters, BIMAL supports proposals which minimise modern slavery risk.

BlackRock Australia can also exert influence in providing guidance in relation to aspects of the control environment developed in relation to the underlying entities. It is BlackRock policy that portfolio companies develop a control environment consistent with BlackRock's Anti Bribery & Corruption Policy.

## 5 How BlackRock Australia assesses effectiveness

We aim to continuously improve our approach to managing and mitigating modern slavery risks. To facilitate this, we monitor and reflect on our progress based on key performance indicators (KPIs). The table below displays KPIs for the current and prior two reporting periods.

Focus Area	31 December 2021	31 December 2022	31 December 2023
<b>Employee Awareness and Training</b>			
Online Code of Business Conduct & Ethics training completion rate	98.2%	98.8%	100%
<b>Supply Chain</b>			
% of Modern Slavery Questionnaire responses received from 'high-risk' BlackRock Australia Suppliers	42%	75%	29%
% of new BlackRock Australia Suppliers acknowledging receipt of BlackRock Supplier Code of Conduct	100%	100%	100%
<b>Investment Activities</b>			
# of engagements by BIS team relating to Company Impacts on People	1247	1469	1353
# of BIS team members within BlackRock Inc	65	73	66
<b>Grievance mechanisms</b>			
Number of reports of modern slavery or related issues through the Whistleblower Program	0	0	0

BlackRock Australia will monitor these KPIs on an ongoing basis and report on them in its future annual modern slavery statement including any remediation which may be required. BlackRock Australia will also review and may enhance these KPIs and develop other metrics as appropriate in line with continuous improvement.

In particular, the following is noted in respect of the year ending 31 December 2023:

- The percentage of modern slavery questionnaires received from 'high-risk' BlackRock Australia suppliers has trended downwards. The questionnaire was previously sent on a quarterly basis to in-scope suppliers. However, the frequency of this process was modified to an annual process. This resulted in 2023 in-scope suppliers not being distributed the questionnaire until the 2024 calendar year. The response rate will be considered as part of the Statement for the year ending 31 December 2024.
- The number of engagements by BIS relating to Company Impacts of People has also trended downwards. Company Impacts of People is one of five priorities which BIS has identified it intends to focus its engagement priorities on. Broadly speaking, Company Impacts on People refer to the holistic approach which companies engage with their key stakeholders – employees, suppliers, customers and communities in their decision-making processes as part of their business operations. A range of social issues are considered, including diversity, equity and inclusion, human capital management and human rights. As BIS's engagement tends to follow market events, engagement in this category was higher in the years prior to 2023 due to the impacts of the Covid pandemic and associated social and wellbeing concerns of people within companies.

## 6 Consultation

BlackRock Australia adopted a cross-functional approach to consultation and drafting of this Statement. The Board of each reporting entity was given an opportunity to consider and provide comments on the Statement prior to publication.

## 7 Approval

This Modern Slavery Act Statement was approved prior to publication by the Board of **BlackRock Investment Management (Australia) Limited** and **BlackRock Australia HoldCo Pty Ltd** respectively and will be updated annually.



**Jason Collins**

Chair and CEO BlackRock Australia  
BlackRock Investment Management (Australia) Limited  
BlackRock Australia HoldCo Pty Ltd

30 June 2024



## **IMPORTANT INFORMATION**

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