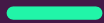




# Modern Slavery Statement

## 2023



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## Acknowledgment of Country

Iress wishes to pay our respects to the Traditional Owners of the lands where we work as well as the lands through which we travel. We recognise Indigenous peoples' continuing connection to land, place, waters and community. We pay our respects to their cultures, country, and elders past, present, and emerging.

# Introduction

## Introduction

Iress Limited (**Iress**) is a leading technology company, designing and developing software and solutions for the financial services industry. Iress operates across Asia-Pacific, the United Kingdom & Europe, Africa and North America. We have prepared this statement in accordance with the *Modern Slavery Act 2015* (UK) (a UK Act) and the *Modern Slavery Act 2018* (Cth) (an Australian Act) (the **Acts**).

## Reporting entities

Iress is a public company incorporated in Australia and listed on the Australian Stock Exchange (ASX). It is the ultimate parent in the Iress Group which consists of the wholly-owned subsidiaries listed in Appendix B. We note that all Iress subsidiaries including those that are reporting entities are wholly-owned and fall under one management structure and operate under the same policies and governance arrangements.

This is a Joint Statement made by Iress Limited (ABN 47 060 313 359) of Level 16, 385 Bourke Street, Melbourne, Victoria 3000 on behalf of Iress Wealth Management Pty Ltd (ABN 67 095 619 837) and Iress FS Limited (company number 02958430) each being reporting entities under the Australian and UK Act respectively.

This Statement addresses our efforts in regard to modern slavery for the financial year 1 January 2023 to 31 December 2023 (**the reporting period**). In this Modern Slavery Statement, the terms “Iress”, the “Company”, “our business”, “organisation”, “we”, “us”, and “our” refer

to Iress Limited including Iress Wealth Management Pty Ltd and Iress FS Limited, unless otherwise stated.

For the reporting period, the financial statements of Iress Limited and its subsidiaries were prepared in accordance with the Corporations Act 2001 (Cth), Australian Accounting Standards and Interpretations, and International Financial Reporting Standards (IFRS) and were independently audited by our external auditor, Ernst & Young, on the basis of that preparation.

## Process of consultation

Consultation with individual entities is not required as policies are adopted on an enterprise level.

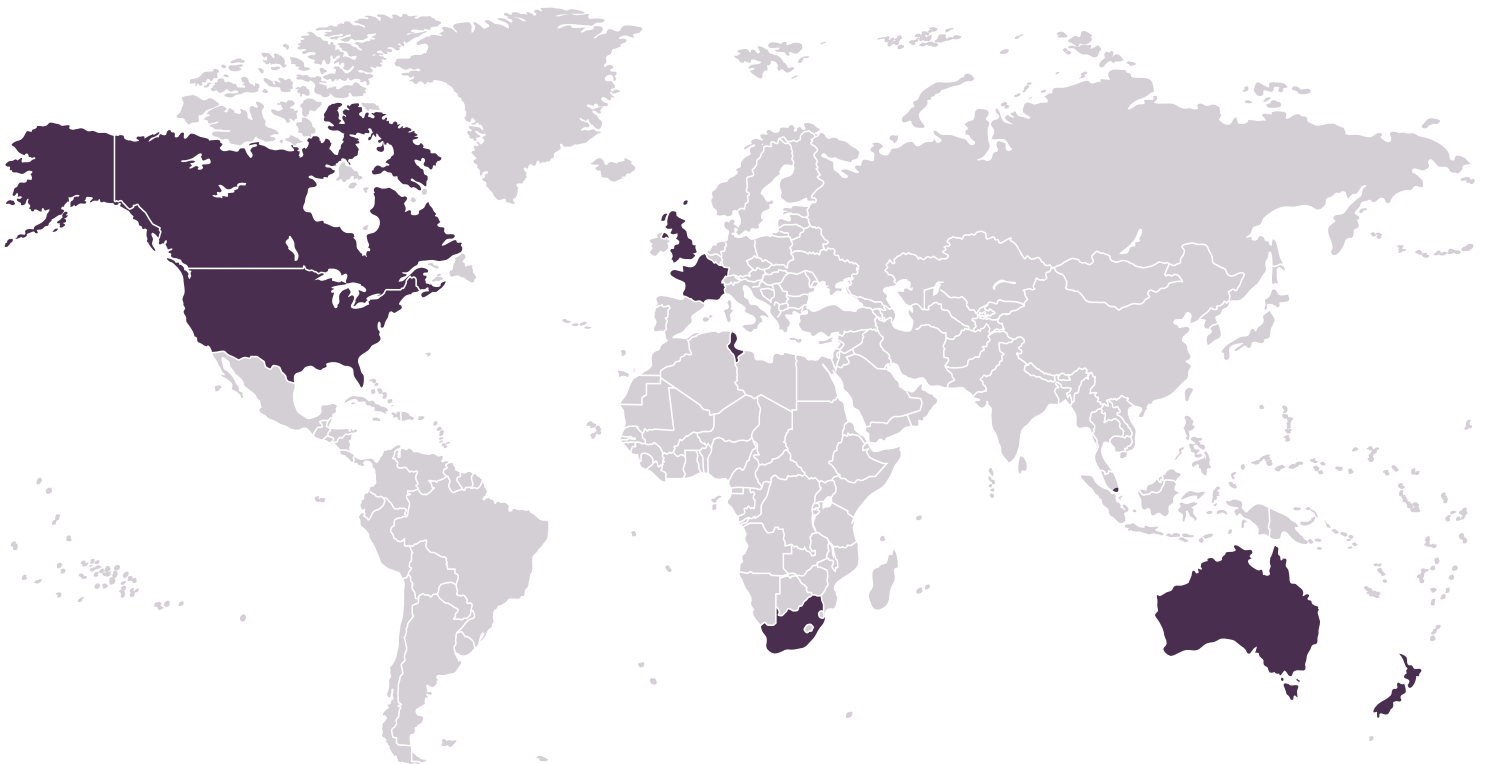
- Management of all businesses across Iress is overseen by the Leadership team, and members of that team were consulted during the preparation of this statement through the Chief Operating Officer as a representative of the Supplier Council.
- Additionally, throughout the reporting period, members of the Leadership team were consulted via the Supplier Council with representatives discussing details of the reporting requirements of the Modern Slavery Act 2018 (Cth) & Modern Slavery Act 2015 (UK); information regarding the actions to be taken by Iress to address these requirements and sharing relevant materials and updates.
- In 2023 we engaged a human rights consultancy to support modern slavery risk identification across operations and supply chain as well as assess current state due diligence and remediation mechanisms at Iress.

# Iress' operations and supply chain

## Operations

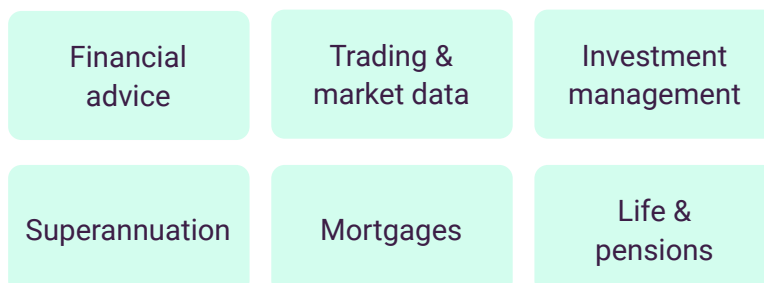
Iress is a leading technology company, designing and developing software and solutions for the financial services industry. Iress' operations include functions focused on product and technology, client solutions, commercial engagements and corporate areas of finance, people, legal, risk and compliance, ESG and marketing and communications.

Iress employs 1900 people and has offices in Australia, Canada, France, New Zealand, Singapore, South Africa, Tunisia, the United Kingdom and the United States of America.



## Products & clients

Our clients range from small retail to large institutional businesses across the financial services industry. Our technology sits at the centre of our clients' businesses, supporting their core operations with essential infrastructure and functionality, helping them to deliver to their clients, members and customers. Our software services the following industries:



## People by contract & region

	Permanent	Fixed term	Contractor*	Total
Australia	900	16	15	931
Canada	49	0	0	49
France	40	0	3	43
New Zealand	19	1	0	20
Remote **	0	0	79	79
Singapore	31	0	0	31
South Africa	137	7	1	145
Tunisia	19	0	0	19
United Kingdom	570	0	10	580
United States of America	3	0	0	3
<b>Grand Total</b>	<b>1766</b>	<b>24</b>	<b>108</b>	<b>1900</b>

\*Contractors primarily provide support for technology related roles including engineering and development.

\*\*Remote is defined as a contractor whose primary location is not an Iress office. The remote workers mentioned above are based in India (29) & the Philippines (50).

# Supply chain

Iress has over 1,600 suppliers across technology infrastructure, software, facilities and associated services, banking services providers, outsourced service providers for various disciplines, as well as professional consultants in finance, legal, marketing and communications disciplines.

Critical suppliers (around 10% of total suppliers) are defined as those that:

- perform a task on behalf of Iress or a customer
- perform or provide a product that is essential to the business continuity of Iress
- represent the most significant supplier spend.

## Suppliers by country

(location based on business operating address)

Billing country*	Number of suppliers	Percentage of overall spend
Australia	222	59.9%
United Kingdom	128	16.5%
France	85	11.3%
South Africa	416	4.5%
Canada	23	4.3%
Singapore	16	1.2%
United States	55	0.9%
New Zealand	9	0.6%
Hong Kong	15	0.4%
Ireland	7	0.2%
Netherlands	5	0.2%
Germany	4	<0.1%

\*Billing country does not necessarily indicate origin of supply. This information requires further investigation at supplier level.

# Governance

Iress believes that maintaining a high standard of corporate governance is essential to sustainable long-term performance and value creation for all stakeholders and the communities in which we operate. Iress operates under a set of well-established corporate governance policies that are regularly reviewed by our Board.

The governance practices in place reinforce and affirm Iress' obligations pursuant to the Corporations Act 2001 (Cth) (Corporations Act), the Australian Securities Exchange (ASX) Listing Rules and other applicable laws and regulations.

The Board's responsibility includes overseeing the Company's strategy, policies, processes and performance in relation to environmental, social & governance (ESG) matters. The risk management function of the Board

is overseen by the Audit & Risk Committee, which is responsible for, amongst other things, ESG at Iress.

In 2023 due to a company-wide restructure, operational responsibility for ESG moved from the Legal function to Corporate Affairs & Marketing. The Chief Corporate Affairs & Marketing Officer is now the risk owner for ESG risks, with support from the Chief Risk Officer who has responsibility for overseeing all material risks across the organisation. In addition, the Chief Operating Officer is accountable for ensuring information flows to the Audit & Risk Committee through bi-annual board papers.

With regards to governance of modern slavery, Iress is committed to managing risk by allocating responsibilities and establishing processes that support the integration of risk management activities across the organisation.

This includes the following key features:

Mechanism	Role & relevance to modern slavery governance
Iress Board	To oversee and consider recommendations from the Audit & Risk Committee and approve the annual Modern Slavery Statement. The Board is provided with modern slavery training and updates on human rights initiatives through management papers.
Audit & Risk Committee	The Committee is responsible for reviewing and monitoring the operational, regulatory, and reputational risks and impacts of ESG including human rights and modern slavery on the Company and providing insight and guidance with respect to the Company's management of such risks and impacts.
CEO & Leadership Team	Approves the ESG strategy and annual plan including human rights initiatives. Monitors the progress of the plan on a quarterly basis.
Chief Corporate Affairs & Marketing & Chief Operating Officer	Oversees the management of strategic initiatives including the Supplier Council with an ongoing modern slavery agenda item. Responsible for Board reporting bi-annually outlining progress on modern slavery initiatives.
ESG function	Works across the business to coordinate and support the delivery of initiatives with responsibility for ESG which incorporates modern slavery.

# Supplier Council

Iress is committed to better understanding and more effectively managing the risk of modern slavery within our operations and supply chain. Iress' Modern Slavery Framework (diagram below) sets out the key elements required to effectively manage modern slavery risks and to support the development of prioritised improvements in a coordinated and focused manner.

A Supplier Council was established in October 2023 to provide oversight of Iress' supplier relationships and is ultimately a decision-making body. The primary objective for the Council as a decision-making authority is to govern the manner in which Iress utilises suppliers to ensure that they represent value for money, are competitively sourced and leverage group-wide buying power. The Council also has oversight of the ESG impacts when approving suppliers including relevant human rights considerations. Operations risk is

governed by the Enterprise Risk Management process.

The Council must follow the Sustainable Procurement Policy and monitor compliance with applicable laws and regulations, [Supplier Code of Ethics](#) and modern slavery legislation. As part of the Council's ESG commitment, the Council must also aim to drive effective cost and emissions management within the business and provide sufficient ESG oversight.

With regard to modern slavery, the role of the Council in the reporting period was to absorb the responsibilities and function of the Modern Slavery Working Group established in 2021 and increase the awareness of modern slavery risks across the organisation. Going forward, the remit of the Council will focus on tracking progress against outlined actions and initiatives.

## Modern Slavery Framework

The Supplier Council provides governance of modern slavery risks within the supply chain. Key focus areas cover the range of topics tabled at meetings and the resulting actions & initiatives.

Supplier Council					
Key focus areas	Governance	Risk identification	Risk management	Grievance & remediation	Monitoring & reporting
Actions & initiatives	Policies, processes & procedures	Due diligence, questionnaires, reviews	Regularly review, test and monitor	Whistleblower, corrective action	Internal reporting channel



# Supporting policies

Iress' purpose, values and policies guide the decisions we make and actions we take as a company, and as individuals. We adopt a series of due diligence activities across the procurement lifecycle to ensure we are engaging suppliers that uphold our corporate requirements, policies, and values. This approach is supported by a range of applicable policies, and governed by the Iress Supplier Council, a cross-functional working group responsible for procurement governance.

This includes providing our employees, suppliers and stakeholders with a clear direction of Iress' expectations of fairness, transparency and accountability in the following key areas:

Policy & processes	Outline
Whistleblowing	<p><u>Iress' Whistleblowing Policy</u> allows eligible individuals including third-party vendors and their employees to raise concerns including modern slavery or human rights abuses in a confidential manner. Iress' Whistleblowing program includes an externally-managed confidential whistleblowing hotline provided by 'Your Call Whistleblowing Solutions'.</p>
Equality, diversity & inclusion	<p>Iress is committed to fostering a diverse, inclusive and equal business outlined in the <u>Global Diversity Policy</u>, Gender Diversity Objectives and our annual reporting to the Workplace Gender Equality Agency (WGEA).</p> <p>In South Africa, in line with Employment Equity legislation, Iress has developed an employment equity plan, produced an annual report and held quarterly employment equity committee meetings.</p>
Workplace discrimination, bullying & harassment	<p>Iress is committed to fostering a workplace free from workplace discrimination, bullying, harassment, sex-based harassment, and victimisation as outlined in the <u>Code of ethics &amp; conduct policy</u>. Employees have the right to feel safe and respected, and in turn the responsibility to prevent workplace discrimination, bullying, harassment, and victimisation.</p>
ESG	<p>We are committed to identifying and managing risks including those relevant to modern slavery and climate change and acting on these as part of our <u>ESG roadmap</u>. The ESG roadmap identifies key strategic priorities between 2022-2025 including strengthening modern slavery risk identification processes, supplier due diligence and grievance mechanisms.</p>
Health & safety	<p>Iress operates a Health &amp; Safety Management System that meets the requirements of ISO 45001:2018. The management system details the operational and occupational controls and processes that we have put in place to manage the health and safety of our people in our offices, and protect our staff on a global level.</p>

Policy & processes	Outline
Sustainable procurement	<p><u>Sustainable procurement policy</u> outlines our approach to Supplier Due Diligence and alignment with Iress' own ESG objectives. This includes Iress' own commitment to complying with applicable Modern Slavery legislation.</p> <p>Through our own continuous improvement processes we are committed to: measuring and monitoring supplier risk, encouraging our suppliers to adopt sustainable practices where necessary and continuously improving our understanding of developments in sustainable procurement, implementing best practice processes and procedures accordingly.</p>
The Supplier Code of Ethics and Conduct	<p><u>The Supplier Code of Ethics and Conduct</u> outlines Iress' commitment to:</p> <ul style="list-style-type: none"> <li>• complying with legal obligations and also to acting ethically and responsibly;</li> <li>• conducting business in a way that is open and accountable to shareholders and the wider marketplace;</li> <li>• creating a safe and non-discriminatory workplace.</li> </ul> <p>Iress expects its suppliers to share these values and to adhere to the matters set out within this Code and this compliance is a condition of signing up to Iress as a supplier, as amended and updated from time to time. Suppliers are also expected to ensure that the rest of their supply chain, including sub-contractors, adhere to this Code.</p> <p>This Code applies to all suppliers engaged by Iress, being any third party organisation that provides goods or services to Iress.</p>

# Modern slavery risk



'Modern slavery risk' refers to the risk to people being affected by modern slavery practices, and how our operations and supply chain may cause, contribute, or be directly linked to modern slavery practices.

## Actions to identify risk during the reporting period

In 2023, we engaged a specialised human rights consultancy to undertake an in-depth assessment of modern slavery risk in our supply chain and operations. This allowed Iress to gain insight into modern slavery risk factors. The methodology for the assessment is outlined below. Iress is using the insights gained to inform future actions, using a risk-based approach to prioritise areas for further due diligence and risk mitigation.

## Risk assessment methodology

The assessment undertaken during the reporting period used reputable data sources to quantitatively and qualitatively determine modern slavery risk based on Iress' spend and operational activities including;

Document review including a spend export of 1 July 2022-31 July 2023 for heightened risk categories of procured services and products

Qualitative review of observed risk exposures with research detailing risks in Australian and international businesses

Quantitative review using a proprietary risk assessment tool.

While operations and supply chains are two different lenses through which to assess modern slavery risks for businesses there is overlap between the two.

# Modern slavery risks in our operations

Based on our assessment of operations and an evaluation of hiring practices and employment terms, internal employee operations were identified as having low risk in modern slavery terms. The following risks were identified across our operations:

Applicable service to Iress	Modern slavery risk/indicators of modern slavery	Countries of operation
<ul style="list-style-type: none"> <li>Physical services (primarily cleaning, catering &amp; security)</li> </ul>	<ul style="list-style-type: none"> <li>Forced/bonded labour</li> <li>Excessive working hours</li> <li>Underpayment of wages</li> <li>Exploitation of migrant workers</li> </ul>	<ul style="list-style-type: none"> <li>Australia, Canada, France, New Zealand, Singapore, South Africa, Tunisia, United Kingdom &amp; United States of America</li> </ul>
<ul style="list-style-type: none"> <li>Offshore professional services (primarily engineering, development &amp; technology roles)</li> </ul>	<ul style="list-style-type: none"> <li>Use of offshore professional services is considered a high-risk labour model</li> <li>Iress has limited visibility of the contracts of external workers and their physical workplace</li> </ul>	<ul style="list-style-type: none"> <li>India, Philippines &amp; Vietnam</li> </ul>
<ul style="list-style-type: none"> <li>Outsourced services (primarily outsourced software development and finance/processing roles)</li> </ul>	<ul style="list-style-type: none"> <li>Use of outsourced operations is considered a high-risk labour model, particularly when performed in offshore locations.</li> <li>Iress has limited visibility of the contracts of external workers and their physical workplace</li> </ul>	<ul style="list-style-type: none"> <li>India, Philippines, Vietnam, Portugal &amp; Bulgaria</li> </ul>

Iress mitigates these risks through contractual requirements detailing obligations for minimum skills and education requirements for offshore employees and the work undertaken by these partners is not considered low-skilled. Offshore partners are also

required to adhere to Iress' Supplier Code of Ethics & Conduct. Additionally, Iress requests payslip samples in these higher risk classifications to demonstrate staff are paid and receive employee benefits in line with their contracts and relevant legislation.

# Modern slavery risks in our supply chain

Iress has reviewed modern slavery risk across the supply chain. Key areas of focus in our supply chain include:

Products provided to Iress by suppliers	This includes any products purchased by the Company to support operations and activities.
Services provided by suppliers	This includes external legal support, labour hire services, recruitment and contract labour, subcontractors, cleaning services, corporate and professional services, waste services & construction.
Products and services used by indirect suppliers in the company's supply chain	This includes products and services purchased by the company's supplies, and their suppliers. There is not a limit to how many tiers down the supply chain this covers.
Products that are integrated into Iress products and provided to Iress clients	This is broadly data incorporated into Iress software products or equipment used in the provision of services (managed services) to clients.

## Geographic risk

Geographic risk takes into account a variety of factors, most notably existence or evidence of forced labour, child labour and human trafficking. Iress' geographic risk is limited by country of billing data. Iress needs to improve data capture of country of supply, manufacture, or final stage processing to increase accuracy of geographic risk.

Country	% of spend	Geographic risk
Malaysia	0%	High
South Africa	4%	Medium
Hong Kong	0%	Medium
USA	0%	Medium
New Zealand	0%	Medium
Australia	65%	Medium
Singapore	1%	Low
UK	15%	Low
Canada	4%	Low
France	11%	Low

The risk assessment identified Malaysia as having the highest geographical risk rating however Iress' expenditure in Malaysia represents <1%, and the services being purchased from these vendors are not a high-risk industry, it is not considered a priority for action. Annual spend data also indicated that over 65% of Iress' supplier expenditure is from Australia, which ranks in the low geographic risk. However, as noted above, this is the country of supply and may not be indicative of the geographic risk at production stage which may be outside Australia.

## Category risks

Category	Description	Risk level	% of spend
Computer & Communication Equipment	Laptops, servers, networking equipment & switches, mobile phones.	Very high	3.37%
Furniture & Fixtures and Office Equipment, Stationery & Supplies	Office furniture, fittings and fixtures, meeting room and breakout furniture and miscellaneous fixings.	Very high	0.16%
Repairs & Maintenance	Office and data centre physical repairs and maintenance.	High	1.83%
Utilities & Services and Electricity	Energy, energy services, property services and related facilities management.	High	1.45%

Percentage of spend represents the highest spend of the high-risk categories and is not indicative of highest overall spend.

Key findings across geographic risk and category risk provide a good perspective for where to focus effort and additional analysis. Within each category we have suppliers in a range of locations, noting that many of the suppliers, whilst in a high risk category, may perform the services in locations which are considered lower risk.

Within the very high risk levels, Computer Equipment as a spend category accounted for the largest proportion of Iress' FY23 expenditure, being 3% assessed as being very high risk. In total, 14 out of the 163 identified spend categories were noted to be high risk for modern slavery and potential human rights violations.

Other key spend categories within the high-risk rating which are of particular significance include Software Expenses, Furniture & Fixtures, and Office Equipment, Supplies & Stationery.

# Actions taken to assess and address modern slavery risks



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## Real-time supplier monitoring

Iress employs real-time supplier monitoring through a range of relevant third party supplier risk data across its supply chain assessing financial risk, cyber security risk, adverse media, ESG scores and supply chain risk, further detail is provided in the '**Real-time monitoring data details**' section below. In addition, suppliers must comply with [Iress' Supplier Code of Ethics & Conduct](#). There is a small subset of suppliers who will not agree to Iress' policy but will instead comply with their own code, which is assessed for material gaps against Iress' policy.

### **Real-time monitoring data details**

Real-time monitoring sets out the key risk factors set out on the next page. We note that it is primarily only the labour-related assessments that provide information relevant to modern slavery which all suppliers in the system are assessed against. In addition, the ethical/regulatory non-compliance assessment looks into corporate regulation non-compliance which can include human rights abuses.

Association	Assessment	Details
<b>Achilles</b>	Labour self-assessment	<ul style="list-style-type: none"> <li>Supplier participation required upon request</li> </ul>
<b>Dow Jones AME</b>	Environmental non-compliance flags	<ul style="list-style-type: none"> <li>Environmental issues</li> <li>Product/service issues</li> <li>Production/supply chain issues</li> </ul>
	Ethical/regulatory non-compliance flags	<ul style="list-style-type: none"> <li>Corruption issues</li> <li>Fraud issues</li> <li>Regulatory Issues</li> </ul>
	Labour, health & safety	<ul style="list-style-type: none"> <li>Discrimination/workforce rights issues</li> <li>Human rights issues</li> <li>Workforce disputes</li> <li>Workforce health/safety issues</li> </ul>
	Sanctions check	<ul style="list-style-type: none"> <li>Company and key person sanctions list &amp; alert</li> </ul>
<b>Moody's</b>	Overall ESG score	<ul style="list-style-type: none"> <li>Badges &amp; inherent risk ratings</li> <li>Carbon footprint assessment</li> <li>Energy transition score</li> </ul>
<b>Prewave</b>	Global media coverage	<ul style="list-style-type: none"> <li>Operational flags</li> <li>Human rights</li> <li>Governance</li> </ul>

Any flags from third party supplier risk data are raised by the Head of Procurement at the monthly Supplier Council meeting. The nature of flags varies, from flagging/quoting the supplier as the source of information, the supplier being quoted in a media release related to modern slavery, or being flagged as the subject of the incident/finding. These flags are discussed at the Supplier Council meeting, and if appropriate, action is taken as detailed in key actions in 2023 (Supplier Code of Ethics). To date, there have been no flags reported that have warranted further action.



# Key actions in 2023

## Supplier Code of Ethics & ongoing action in engaging new suppliers

The Supplier Code of Ethics and Conduct was reviewed and updated in April 2023 defining rules of engagement with suppliers. When engaging with any and all new suppliers through an RFP process, Iress follows the following process:

- Suppliers receive a link to the Iress Corporate Governance documents including:
  - the Modern Slavery Statement and
  - the Supplier Code of Ethics and Conduct Policy.
- Where Iress believes or suspects that prospective suppliers' operations are not aligned with these policies, they are directed to contact the Head of Procurement (member of the Modern Slavery Working Group) to discuss the areas of concern and identify any risks of non-compliance. The Head of Procurement would escalate the concerns to the Chief Operating Officer and discuss remediation plans with that supplier, or not proceed further with that entity.
- Suppliers complete an extensive section on Human Rights including modern slavery in the Self Assessment Questionnaire. This information is processed and checked by the Head of Procurement and any flags are raised in a timely manner. The process triggered by a flag against a supplier includes a discovery process around the detail, fact-finding and extent of the flag. Additionally, an analysis of the significance and relevance of the flag to the supplier and Iress is completed. Findings are discussed with members of the Supplier Council, with additional clarification sought from suppliers where appropriate. Should an action or mitigation plan be required with that supplier one would be developed. Additionally, misunderstanding of

questions or expectations is a common source of flags from this process, often requiring clarification rather than mitigation.

## Workshop & training

An internal human rights workshop facilitated by an external consultant was held during the reporting period. Attendees across ESG, legal, procurement, people, compliance and risk management teams were represented as well as Leadership and Board representatives - including the Chair of the Board Audit & Risk Committee. Topics covered included defining Modern Slavery, analysis of Iress' supply chain risk assessment and opportunities for continuous improvement.

All employees have access to ongoing Modern Slavery training through the Iress intranet.

## Risk assessment

Iress engaged a human rights consultancy to undertake an in-depth modern slavery risk assessment using reputable data sources to quantitatively and qualitatively determine risk based on Iress' spend and operational activities. This process identified high risk supply chain categories for further investigation and action, a need for improvement in due diligence and grievance mechanisms as well as informing the key priorities identified in 'Ongoing Commitment'.

## Due diligence and risk management

Iress undertook an external review of due diligence processes via desktop analysis and engagement with key stakeholders at Iress with recommendations for improvements. The current process for due diligence

at Iress is undertaken at the onboarding stage and post-contract. The risk assessment undertaken in 2023 identified high risk categories which require further investigation including targeted auditing of individual suppliers and category management plans. A core group from business including procurement, legal, finance and operations are informed if there is a red flag from the Self Assessment Questionnaire or real time data monitoring. The external review identified gaps and limitations which will be addressed in 2024.

## **Grievance procedure review**

Iress undertook an external review of Iress' grievance mechanism and assessment against benchmark effectiveness criteria.

## **Enterprise risk integration**

As a global technology company and licensed financial services business, the dynamic market and business in which Iress operates has evolved, and will continue to do so. Accordingly, a robust, consistent and effective risk management framework which proactively identifies, manages and mitigates risks is essential for the ongoing success of Iress. In 2023, we further enhanced our risk management framework, which is underpinned by the principles outlined in ISO 31000: 2018 – Risk Management Guidelines.

Iress has considered modern slavery in its enterprise risk assessment and has included it as a key risk in the risk register as part of ESG, including assigning a risk owner, assessing control effectiveness and documenting key actions to achieve target risk rating.

# Grievance & remediation

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Iress continues to review and improve how we receive and respond to modern slavery concerns with avenues for employees to safely raise concerns about modern slavery in Iress' operations and supply chain.

The following process is proposed for dealing with a grievance:

- Incident report through 'Your Call' Whistleblower hotline<sup>1</sup> or email inbox: [humanrights@iress.com](mailto:humanrights@iress.com)
- Assessment by Supplier Council
- Escalation to Chief Operating Officer
- Remediation (including obtaining independent third party legal advice and escalating to law enforcement, where required)
- Ongoing review managed by Supplier Council.

Following an external review of Iress' grievance mechanism, identified gaps will be assessed in 2024.

No modern slavery grievances were raised in the reporting period however, this does not necessarily mean that there were zero incidences of modern slavery. Iress understands remediation requires returning an affected person to a position they would be in had the harms not occurred.

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<sup>1</sup>The 'Your Call' Whistleblower hotline is accessible to all employees of the Iress group including part-time and casual employees, officers, agency workers, contractors and suppliers and their employees (where relevant) and is subject to applicable laws as they apply to the local Iress entity.

# Measuring effectiveness

Iress is committed to reviewing the governance and processes in place to assess the effectiveness, suitability and efficiency of actions for continuous improvement.

Key area	Description	Progress in 2023
Governance & due diligence	As part of our risk culture of continuous improvement, we regularly review our modern slavery processes and procedures to ensure they remain appropriate and are performing effectively. Processes and procedures undertaken include due diligence, screening, monitoring and segmentation. Policies in scope include the Supplier Code of Ethics and Sustainable Procurement Policy.	Held a human rights workshop with attendees across ESG, legal, procurement, people, compliance and risk management teams as well as Leadership and Board representatives - including the Chair of the Board Audit & Risk Committee to identify gaps, review current approaches and prioritise actions listed in the ESG Roadmap.
Procurement & supply chain	Supplier segmentation provides the ability to apply targeted focus to areas of heightened supply chain risk, additionally, realtime Know Your Supplier covering all suppliers allows Iress the ability to identify, track, and remediate supply chain risks efficiently. This enables Iress to improve alignment with the Supplier Code of Ethics.	Implemented a new supplier onboarding process that captures information and engages due diligence across Procurement, Information Security, Privacy, Accounts teams and engages the Legal team for contracts review.  Gathered data via real-time monitoring of all non-government suppliers, including financial stability, adverse media (environmental, labour, health & safety, ethical & regulatory media), sanctions, and company sustainability credentials via Beroe LiVE. Ai™.
Process for feedback	Annual employee ESG survey measures improvement and feedback on initiatives. Materiality process with internal and external stakeholders seeks to identify and address relevant issues.	Gathered annual findings and engaged in ongoing discussions with Supplier Council and Leadership for identified opportunities.

Table continued from previous page

Key area	Description	Progress in 2023
Training	Tracking participation and awareness of material modern slavery concerns.	Established a partnership with a training provider to access resources to train our people in awareness, identifying and acting on modern slavery risks within our supply chain and business operations. Training will be offered in February 2024.
Whistleblower hotline	Disclosures made to our confidential and anonymous whistleblower hotline are reviewed for issues raised in relation to modern slavery.	No reports of modern slavery or modern slavery indicators received through this mechanism.

# Ongoing commitment

Iress is committed to identifying slavery and human rights abuses across its business. Therefore, Iress has included policy statements in its Code of Ethics and Conduct Policy, and its Supplier Code of Ethics and Conduct, which reflect Iress' commitment to ensuring that slavery and human trafficking do not take place anywhere within its business activities or supply chain.

Iress completed its sixth edition of ESG reporting (2023) in accordance with the GRI Standards. Iress reported on the following GRI disclosures relevant to Human Rights:

- GRI 102-9 Supply Chain
- GRI 405 Diversity and Equal Opportunity 2016
- GRI 406 Non-discrimination 2016
- GRI 412 Human Rights Assessment 2016
- GRI 414 Supplier Social Assessment 2016

Key priorities to address Modern Slavery risk include:

Key Initiative	Action	Timeline
Category management plans	Category management is a strategic approach to procurement – it helps to consolidate efforts by group purchasing and supplier engagement by specific products and services being procured, business lines or other groupings that work with Iress. It is a cohesive approach to supplier engagement that considers specific needs and risks of each category and manages specific risks. It aims to standardise procurement procedures and support strategic sourcing. In partnership with an external consultancy, Iress will develop category management plans for the following high risk categories: <ul style="list-style-type: none"> <li>• Procurement of Merchandise for Iress Promotion</li> <li>• Use of Labour Hire Agency and Outsourcing</li> <li>• Sourcing of Computer Equipment</li> </ul>	2024
Modern Slavery Governance	Key business stakeholders to be onboarded and engaged in the Supplier Council including ongoing training and discussion about modern slavery risk and effectiveness. Review and enhancement of policy frameworks for modern slavery.	2024-2025
Strengthening due diligence	Develop efficient and credible processes and methods for supplier due diligence following recommendations from the external review.	2024-2025

Table continued from previous page

Key Initiative	Action	Timeline
Conducting third party audits and disclose outcomes	Go beyond self-assessment and request high-risk suppliers undertake third party verification audits and publish the audit results transparently.	2024-2025
Strengthening grievance & remediation procedures	Implement effective grievance mechanisms following recommendations from the external review.	2024-2025
Improving supplier engagement	Create a structured process for engagement around meeting appropriate standards and improve the Supplier Code of Conduct by aligning it with UNGPs and relevant industry initiatives	2024-2026

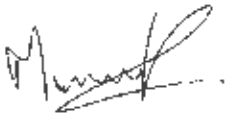
# Approval

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This statement was approved by the board of Iress Limited in their capacity as the principal governing body of Iress Limited on 1 May 2024.

This statement is signed by Marcus Price in his role as the Managing Director & CEO of Iress Limited on 12 June 2024.

Signed:



**Marcus Price**  
Managing Director & CEO of Iress Limited  
12 June 2024.

Iress Limited | A.B.N. 47 060 313 359  
Modern Slavery Act Statement

You can download a copy of the Modern Slavery Act Statement [here](#).



## Appendix A Reporting Criteria

Reporting criteria	Page/s
Section 16 (a) Identify the reporting entity	3
Section 16 (b) describe the structure, operations and supply chains of the reporting entity	3, 4-6
Section 16 (c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	11-14
Section 16 (d) describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	7-10, 15-19
Section 16 (e) describe how the reporting entity assesses the effectiveness of such actions	20-21
Section 16 (f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls	3
(ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	3
Section 16 (g) include any other information that the reporting entity, or the entity giving the statement, considers relevant	22-23

## Appendix B Wholly-owned subsidiaries

Details of the Group's wholly-owned subsidiaries during the reporting period are as follows with Iress Wealth Management Pty Ltd (ABN 67 095 619 837) and Iress FS Limited (02958430) being reporting entities.

Australia	
BC Gateways Pty Ltd (ACN 624 873 490)	No More Practice Education Pty Ltd (ABN 44 615 591 949)
Diversa Funds Management Pty Ltd (ACN 134 494 901)	No More Practice Holdings Pty Ltd (ABN 63 615 069 568)
Diversa Pty Ltd (ACN 079 201 835)	OneVue Financial Pty Ltd (ABN 21 608 820 560)
FUND.eXchange Pty Ltd (ACN 109 989 166)	OneVue Holdings Ltd (ABN 15 108 221 870)
Financial Synergy Actuarial Pty Ltd (ACN 006 662 406)	OneVue Pty Ltd (ABN 18 072 262 312)
Financial Synergy Holdings Pty Ltd (ACN 126 127 197)	OneVue Services Pty Ltd (ABN 71 104 037 256)
Financial Synergy Pty Ltd (ACN 005 484 391)	OneVue Super Member Administration Pty Ltd (ABN 90 094 584 755)
Glykoz Pty Ltd (ACN 099 594 153)	OneVue Super Services Holdings Pty Ltd (ABN 94 113 266 569)
Group Insurance & Superannuation Concepts Pty Ltd (ACN 070 756 740)	OneVue Super Services Pty Ltd (ABN 74 006 877 872)
Innergi Pty Ltd (ACN 120 557 539)	OneVue UMA Pty Ltd (ABN 90 009 435 465)
Investment Gateway Pty Ltd (ABN 91 090 411 537)	OneVue Unit Registry Pty Ltd (ABN 32 095 595 396)
Iress Data Pty Ltd (ACN 137 251 702)	OneVue Wealth Assets Pty Ltd (ACN 670 987 434)
Iress Euro Holdings Pty Ltd (ACN 633 540 182)	OneVue Wealth Services Ltd (ABN 70 120 380 627)
Iress Information Pty Ltd (ACN 070 518 811)	OneVue Wealth Solutions Pty Ltd (ABN 90 617 181 290)
Iress International Holding Pty Ltd (ACN 164 903 735)	Planning Resources Group Pty Ltd (ACN 064 304 847)
Iress South Africa (Australia) Pty Ltd (2011/005040/10)	Top Quartile Management Pty Ltd (ABN 98 006 771 848)
Iress Spotlight Wealth Management Solutions (RSA) Pty Ltd (ACN 124 966 463)	Tranzact Consulting Pty Ltd (ABN 78 058 305 525)
Iress Wealth Management Pty Ltd (ACN 095 619 837)	Tranzact Financial Services Pty Ltd (ABN 84 089 997 731)

Lucsan Capital Pty Ltd (ACN 087 167 226)	Tranzact Superannuation Services Pty Ltd (ABN 33 056 524 522)
Map Funds Management Pty Ltd (ABN 85 011 061 831)	
<b>Canada</b>	
Iress Canada Holdings Ltd 61 1557 (New Brunswick) 161 5658 (Ontario)	Iress (Ontario) Ltd 62 4706 (New Brunswick) 174 3872 (Ontario)
Iress (LP) Holdings Corp. 308 8197 (Nova Scotia) 21 1110 7633 (Alberta) A006 2387 (British Columbia) 11 6229 9722 (Quebec)	KTG Technologies Corp. 305 9903 (Nova Scotia) 156 6438 (Ontario)
Iress Market Technology Canada LP 1 4041 2008 (Ontario) 1114 1041 (Alberta) XP37 3761 (British Columbia) 33 6435 5506 (Quebec) 62 9500 (New Brunswick)"	
<b>South Africa</b>	
Advicenet Advisory Services (Pty) Ltd (2001/026794/07)	Iress MD RSA (Pty) Ltd (1965/002808/07)
Iress Hosting (Pty) Ltd (1998/022429/07)	Iress Wealth MNGT (Pty) Ltd (2000/009471/07)
Iress Financial Markets (Pty) Ltd (2003/017207/07)	
<b>United Kingdom</b>	
Iress FS Group Ltd (5455415)	Iress (UK) Ltd (6836280)
Iress FS Ltd (2958430)	Iress UK Holdings Ltd (8612198)
Iress Mortgage Services Ltd (3598058)	Iress Web Ltd (5501526)
O&M Systems Ltd (8739985)	Proquote Ltd (3851830)
O&M Life & Pensions Ltd (2717535)	Pulse Software Systems Ltd (8230913)
Iress Portal Ltd (2596452)	Pulse Software Management Ltd (3188887)

Iress Solutions Ltd (3896352)	QuantHouse UK Ltd (6578906)
Iress Technology Ltd (7784841)	TrigoldCrystal Ltd (3598974)
<b>Other countries</b>	
BC Gateways Ltd (Hong Kong) (BRN 67641738)	Iress SAS (449 703 248)
Iress Asia Holdings Ltd (Hong Kong) (BRN 51414991)	Iress Tunisia Branch Sàrl (B01211292018)
Iress Inc (4444188)	QH HoldCo (Luxembourg) (B 210.102)
Iress Malaysia Holdings Sdn Bhd (Malaysia) (1057037-X)	QuantHouse Singapore Pte Ltd (Singapore) (201631356H)
Iress Market Technology (Singapore) Pte Ltd (Singapore) (200923761E)	Waysun Technology Development Ltd (Hong Kong) (BRN 68157908)
Iress (NZ) Ltd (New Zealand) (9 429 039 268 846)	



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