

BlackRock[®]

Modern Slavery Statement

For the year ending 31 December 2021

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 year ending 31 December 2021 (**Statement**).

References to BlackRock Australia mean the two entities making this Statement, namely:

- **BlackRock Investment Management (Australia) Limited** (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, Inc**” or “**We**”, “**Our**”, “**Us**” refer to BlackRock’s global business and therefore include the BlackRock Australia entities.

This is BlackRock Australia’s second Statement and similar to the prior year, 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 2021, had 154 staff 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. In pursuit of this, a focus on long-term sustainability is embedded across our business. From integrating environmental, social and governance (**ESG**) practices into our investment processes to creating positive social impact by serving communities in Australia, we are dedicated to helping clients, employees, shareholders and communities achieve long-term, 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.

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

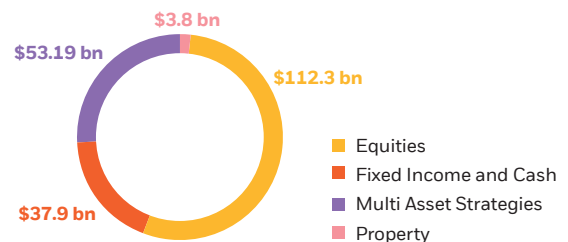
In 2021, BlackRock Australia was entrusted to manage AUD \$207.2 billion assets under management, comprised of asset classes/strategies as shown in Figure 1.

On behalf of its clients, BlackRock Australia invests broadly in most asset classes and across the globe. Though modern slavery may occur anywhere, we are aware of modern slavery occurring in industries including construction and infrastructure, manufacturing, mining and agriculture and food processing, and in jurisdictions and regions with a greater prevalence of modern slaveryⁱ. 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 ESG risk management 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.

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 Modern Slavery Act 2018.

Figure 1: BlackRock Australia Total AUM



as at 31 December 2021

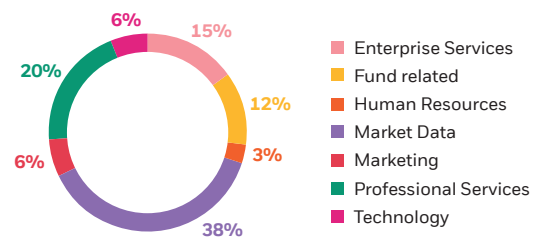
Suppliers

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 Organisationⁱⁱ (ILO).

In 2021, BlackRock Australia spent approximately AUD\$25 million on goods and services across 171 suppliers. Of that spend, approximately 60% relate 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 have 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 high(er) exposure risk to modern slavery, generally fall into the supplier industry under Enterprise Services or Technology, which make up approximately 15% and 6% respectively (see Figure 2) of BlackRock Australia's 2021 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 2021

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
Code of Business Conduct and Ethics	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 behavior.
Supplier Code of Conduct & Ethics	BlackRock, Inc's Supplier Code of Conduct & Ethics details expectations of its suppliers in relation to human rights, inclusion & diversity, environmental sustainability and ethics. In particular, it provides that suppliers: <ul style="list-style-type: none"> • 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. • Not to use any involuntary labor, such as slave, forced, bonded, indentured or prison labor and not be involved in any human trafficking or exploitation.
Global Policy for Reporting Potential Illegal or Unethical Conduct	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: <ul style="list-style-type: none"> • Business Integrity Hotline • Business Integrity Reporting Website <p>The Business Integrity Hotline and the Business Integrity Reporting Website are administered on behalf of BlackRock by an independent external third party.</p> <p>Third parties may also report concerns by calling the number identified on the Investor Relations / Corporate Governance page on BlackRock, Inc's public website – www.blackrock.com</p>
Australian Whistleblower Protection Procedure	

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 and bribery and corruption and adhering to relevant sanctions regimes and to complying fully with all applicable laws and regulations designed to combat financial crime, including those potentially linked to human rights violations.

BlackRock Australia has in place a risk-based framework which seeks to ensure adherence to relevant Anti-Money Laundering (**AML**), Counter-Terrorism Financing (**CTF**) and sanctions laws and regulations in the countries in which it operates.

C. Investment stewardship

As a key investment function, BlackRock's Investment Stewardship (**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 ESG 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 Human Rights

In our experience, companies that build strong relationships with their stakeholders are more likely to meet their own strategic objectives, while poor relationships may create adverse impacts that expose a company to legal, regulatory, operational, and reputational risks and jeopardise their social license to operate. We recognise that exposure to human rights-related risks will vary by company and by industry. This is why we ask 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.

As defined by the United Nationsⁱⁱⁱ, human rights are inherent to all human beings and include the right to life, health and well-being, privacy, fair wages, and decent working conditions; freedom from discrimination, slavery, and torture; and freedom of association.^{iv} Considerations regarding the role of business in upholding human rights have been an important topic for decades, culminating in the establishment of the UN Guiding Principles on Business and Human Rights (UNGPs)^v and the Organization for Economic Cooperation and Development's (OECD)^{vi} global standards for promoting responsible business conduct. While not legally binding, governments, corporations, and other stakeholders increasingly consider them as a basis for managing human rights issues related to corporate activities.

In a highly interconnected global economy facing challenges such as climate change, demographic and technological shifts, and growing social inequality, companies face increasing scrutiny regarding how they address human rights issues that may arise from their business practices. We believe that, over time, the approach that we and other investors take to evaluating and engaging with companies on their human rights impacts can encourage them to integrate sound business practices that benefit relevant stakeholders over the long-term. We are committed to engaging with companies on how they manage the human rights issues that are inherent in their businesses and monitor human rights practices on a best-efforts basis.

Human Rights as an Investment Issue

It is our conviction that our clients, as long-term shareholders, benefit when companies operate their businesses responsibly. Unmanaged potential or actual adverse human rights issues can not only harm the people directly affected, but also expose companies to significant legal, regulatory, operational, and reputational risks.

Our expectations of Boards and management teams on Human Rights

As part of our enhanced approach to Company Impacts on People, in 2021 BIS published a commentary outlining **our approach to engagement with companies on their human rights impacts**. We expect companies to provide robust disclosures on their approach to governance, strategy, and management of material business risks and opportunities. This information can help investors better understand how companies are managing their material risks and planning for the long-term. Recognising that exposure to human rights-related risks will vary by company and by industry, we ask that companies report on how they integrate human rights considerations into their operations and risk management processes, and demonstrate the steps they are taking to address these issues.

Human Rights as an Investment Issue

Whether a company **prioritizes human rights** across its value chain – its products and services, operations, and suppliers – and whether it adheres to applicable voluntary or mandatory disclosure frameworks (e.g. the UNGPs, OECD Guidelines, UN Global Compact,^{vii} UN Sustainable Development Goals,^{viii} the EU Non-Financial Reporting Directive,^{ix} and relevant Modern Slavery Acts^x, among others)

How the **board oversees** human rights, including whether the full board or a specific committee has responsibility to oversee related policies and processes, and the type and frequency of information reviewed

How a company **identifies, mitigates, and prevents** human rights impacts and determines the appropriate due diligence processes to minimize risk (e.g. human rights risk assessments, supply chain tracing, recruitment procedures, and auditing and grievance mechanisms, etc.)

How a company **measures and assesses the effectiveness** of its human rights management and mitigation strategy, including relevant metrics and targets and the use of any third-party assurance providers

How a company **reconciles ambiguities or contradictions** between local human rights laws or regulations and international standards as they affect its operations or its supply chain, and how the board and management team balances stakeholder considerations and maintains trust

Whether a company **engages with affected stakeholders** and provides access to remedy to address actual human rights impacts. This includes whether companies obtain (and maintain) the free, prior, and informed consent of indigenous peoples for business decisions that affect their rights; protect cultural heritage sites; and provide access to resources and/or compensation in the event of displacement or destruction

Whether a company **collaborates with industry peers and other stakeholders** on initiatives to advance practices and address pervasive issues related to human rights (e.g. the Responsible Business Alliance or Roundtable on Sustainable Palm Oil)

How We Engage with Companies on their Human Rights Impacts

BIS identifies companies for engagement based on our Engagement Priorities^{xi} our prior history of voting and engagement with the company, and our assessment of a company's financial and governance performance relative to its peers. We also consider events that have impacted or may impact long-term shareholder value, including breaches of international standards that may result in adverse human rights impacts and create material business risks.

We may vote against directors if, in our assessment, a company is not effectively addressing or disclosing material human rights-related risks or impacts. Our assessment is based on information in the public domain, including third party research. In our direct dialogue with company leadership, we explore the topics outlined above, amongst others, to understand the company's approach, provide feedback, and communicate our expectations.



As an example, the 2021 Investment Stewardship Report included a case study on BIS's multiple engagement with an online clothing retailer throughout 2020 and 2021. Most notably, BIS was actively engaging with the company in 2020, expressing its concerns on allegations of worker exploitation in the company's supply chain. Going into 2021, BIS observed the company taking important steps in response to this feedback however, the extent to which the company would adopt more vigorous supply chain management standards, in general, remained uncertain. This raised questions about the company's commitment to greater accountability. As a result, at the June 2021 Annual General Meeting, BIS did not support the re-election of the co-founder who serves on the board as an executive director. BIS continues to engage with the company to monitor progress on its supply chain management.

We recognise that no single governance model or approach is universally appropriate for how companies address human rights issues, given variations in regional market practices. We leverage our regional presence and local expertise to inform our engagement on human rights, considering both international and local market standards, regulations, and context.

Conclusion – BIS and Human Rights

Failure to address human rights-related risks can reverberate across a company's entire value chain, which may affect critical relationships with key stakeholders and impact shareholder value. As a long-term investor, we believe that having a better understanding of how companies manage these risks and advocating for the adoption of responsible business practices is an important component of our ability to steward our clients' assets.

In 2021, BIS prioritised its engagement with companies whose business practices have breached international norms set forth by the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. In particular, BIS is engaging with companies that have experienced severe social controversies to assess their board oversight, due diligence, and remediation efforts.

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 and staff transfers), 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.

Please also see: <https://www.blackrock.com/corporate/responsibility/human-capital>

E. SUPPLIERS (THIRD PARTY VENDORS)

As a participant of the United Nations Global Compact (**UNGC**)^{xii}, we are committed to aligning our operations with universal principles on human rights, labour, environment and anti-corruption, and to take actions that advance societal goals. As such, we expect all companies and individuals which supply goods, materials or services to us (**Suppliers or Vendors**) to seek 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 also maintain a global framework of internal policies including a Sourcing and Vendor Management (SVM) Policy and a **Third-Party Risk Management Policy**.

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 & Ethics was last reviewed and updated in March 2021. In July 2021, a new process was implemented whereby new Suppliers were 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 Modern Slavery and notify BlackRock immediately if there have been any potential or confirmed offences relating to human trafficking and/or slavery and required to act quickly to take corrective actions, as appropriate.

Sanctions Screening

We screen Suppliers against Sanctions Lists^{xiii} prior to an initial payment to them and on a periodic ongoing basis. 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.

Supplier Due Diligence

BlackRock Inc utilises a platform for due diligence risk data collection from Suppliers. The platform enables more efficient and dynamic access to due diligence data for relevant employees involved in the ongoing management of Suppliers and to send a specific 'modern slavery' questionnaire to Suppliers.

An industry-level classification screen is adopted to identify those suppliers that represent a 'high-risk' of modern slavery, being industries where historically a prevalence of forced labour has occurred by reference to the industries cited in the ILO's 2017 Global Estimates of Modern Slavery:



'High-risk' Goods Industries

- Hardware
- Office supplies, including furniture
- Merchandising/promotional items

'High-risk' Services Industries

- Cleaning
- Facility services, including general maintenance and repairs
- Mechanics and plumbing
- Security
- Pantry supplies
- Catering

In 2021, BlackRock Australia utilised 171 Suppliers, and approximately 17% were categorised as belonging to these industries and accordingly deemed as potentially 'high risk' (no de-minimis monetary threshold has been applied). The total annual spend on 'high-risk' Suppliers susceptible to modern slavery, however, represents 1% of total Supplier spend in 2021.

Using the due diligence platform, a due diligence questionnaire was sent to the primary contact at each of these Suppliers upon being onboarded. During 2021, a dedicated Corporate Sustainability resource became responsible for monitoring and reviewing completed due diligence questionnaires and assessing for any indication of modern slavery practices.

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). We had considered certain KPIs as part of preparing our first Modern Slavery statement in 2021 (for the year ending 31 December 2020), and others we identified throughout the course of the year ending 31 December 2021.

Focus Area	31 December 2020	31 December 2021
Employee Awareness and Training		
Online Code of Business Conduct & Ethics training completion rate	98.7%	98.2%
Supply Chain		
% of Modern Slavery Questionnaire responses received from 'high-risk' BlackRock Australia Suppliers	– ¹	42%
% of new (nonexempt) BlackRock Australia Suppliers (onboarded post 1 July 2021) acknowledging receipt of BlackRock Supplier Code of Conduct	– ²	100%
Investment Activities		
# of engagements by BIS team relating to Company Impacts on People ³	1077	1247
# of BIS team members within BlackRock Inc	45	65
Grievance mechanisms		
Number of reports of modern slavery or related issues through the Whistleblower Program	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.

- 1 No comparative metrics available as at 31 December 2020, as process was being established in 2020, and subsequently implemented in 2021 calendar year.
- 2 No comparative metrics available as at 31 December 2020, as process was implemented for new onboarded Australia suppliers from 1 July 2021 onwards.
- 3 Company Impacts on People is one of five priorities which BIS has identified it intends to focus its engagement priorities on in 2021. 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. In 2020, the equivalent engagement priority is referred to as Human Capital Management.

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.



Andrew Landman

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

30 June 2022

- i For example see the Global Slavery Index and the US Government List of Goods Produced by Child Labor or Forced Labor.
- ii Methodology of the global estimates of modern slavery: Forced labour and forced marriage - International Labour Office (ILO), Geneva, 2017
- iii United Nations. "Universal Declaration of Human Rights (UHDR)". Available at https://www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/eng.pdf
- iv The Universal Declaration of Human Rights was adopted by the UN General Assembly in 1948. Since then, the core principles have been reiterated in various international human rights conventions and treaties. Today, all UN member states have ratified at least one of the nine core international human rights treaties on behalf of their governments, and 80% have ratified four or more. More information is available at <https://www.un.org/en/sections/universal-declaration/human-rights-law/index.html>
- v United Nations. "Guiding Principles on Business and Human Rights". Available at: https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
- vi Originally adopted in 1976, the OECD Guidelines for Multinational Enterprises were most recently updated in 2011. In 2017, the OECD published guidance for institutional investors on how they can monitor companies' business practices, which are available at: <https://mneguidelines.oecd.org/RBC-for-Institutional-Investors.pdf>.
- vii The UN Global Compact. "The Ten Principles of the UN Global Compact". Available at: <https://www.unglobalcompact.org/what-is-gc/mission/principles>.
- viii The UN Global Compact. "The SDGs explained for Business". Available at: <https://www.unglobalcompact.org/sdgs/about>.
- ix European Commission. "Non-Financial Reporting". Available at: https://ec.europa.eu/info/business-economy-euro/company-reporting-and-auditing/company-reporting/non-financial-reporting_en
- x Examples include the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the California Transparency in Supply Chains Act.
- xi <https://www.blackrock.com/corporate/about-us/investment-stewardship>
- xii 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>.
- xiii 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")

IMPORTANT INFORMATION

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