

ASX Group Modern Slavery Statement



FY2025



Letter from the CEO

ASX Group has a foundational role in Australia's financial system. This means that we must have strong management frameworks with resilient and responsible business practices embedded in our organisation. As part of this, our Modern Slavery Policy and practices are focused on protecting human rights and addressing the risks of modern slavery within our business and supply chain.

A key element of our policy is ensuring that we only engage with suppliers that share our values in the prevention of modern slavery practices. In FY2025 and early FY2026, we completed 169 modern slavery risk assessments on our base of suppliers where ASX Group's spend was over \$50,000. We also focused on suppliers identified as being in high-risk geographies, categories (such as utilisers of offshore manufacturing) or sectors. The assessments completed in early FY2026 also include those mistakenly missed in FY2025. We have taken steps to enhance our processes to minimise the likelihood of this happening again.

We are also focused on ensuring that our people are aware of modern slavery risks as they undertake their roles. Mandatory training is in place for all ASX Group employees including modules on modern slavery, the [ASX Code of Conduct](#), appropriate workplace behaviours and whistleblower protections. There is additional modern slavery awareness training for our Procurement team given their key role in assessing and managing our supply chain.

We will continue to evolve our approach to measuring and reporting the effectiveness of our actions to mitigate these risks and help ensure that we are addressing the issue of modern slavery.



Helen Lofthouse
Managing Director and CEO

Reporting entities covered by this statement

This statement relates to the reporting period commencing 1 July 2024 and ending 30 June 2025 (the **FY2025 reporting period**). This Modern Slavery Statement is a joint statement made on behalf of:

Entity	Description
ASX Limited (ABN 98 008 624 691) (ASX Limited)	ASX Limited operates Australia's primary national securities exchange.
ASX Operations Pty Limited (ABN 42 004 523 782) (ASXO)	ASXO is ASX Group's primary services entity and contracting entity.
ASX Clearing Corporation Limited (ABN 45 087 801 554) (ASXCC)	ASXCC is the parent of ASX's central counterparty (CCP) entities, ASX Clear and ASX Clear Futures.
ASX Clear (Futures) Pty Limited (ABN 91 050 615 864) (ASX Clear (Futures))	ASX Clear (Futures) provides CCP clearing of exchange-traded derivatives and over-the-counter (OTC) derivatives. Through the novation process, the CCP assumes the credit risk of all trades centrally cleared and facilitates an efficient and orderly clearing and settlement function for the market.
ASX Clear Pty Limited (ABN 48 001 314 503) (ASX Clear)	ASX Clear provides CCP clearing for transactions in shares, warrants, structured products and equity derivatives listed on the ASX and the markets of other Approved Market Operators, and for OTC equity derivative transactions reported to ASX Clear. ASX Clear is the sole provider of clearing services for Australia's equity markets, including cash equities and exchange-traded equity options.
ASX Settlement Corporation Limited (ABN 48 008 617 187) (ASX Settlement Corporation)	ASX Settlement Corporation is the parent of ASX Settlement Pty Limited, which provides cash market settlement and issuer services.
ASX Settlement Pty Limited (ABN 49 008 504 532) (ASX Settlement)	ASX Settlement provides the Securities Settlement Facility (SSF) for participants to settle cash market securities transactions through the Clearing House Electronic Subregister System (CHES). It is maintained by ASX and provides services for effecting and registering transfers of equity instruments. The Company also provides issuer services to issuers of approved financial products. These services include registry set up, issuer announcements and administration, holding adjustments made as a result of corporate actions, and the provision of CHES holding statements and holder identification numbers (HINs).

These entities are collectively referred to as the **ASX Group Reporting Entities** for the FY2025 reporting period, pursuant to the requirements of the Modern Slavery Act 2018 (Cth).

ASX Group structure, operations and supply chain



Our structure

ASX Limited is a publicly listed company incorporated in Australia and is the parent company of a number of wholly-owned subsidiary companies including each of the ASX Group Reporting Entities and a number of other companies in which one or more of ASX’s entities have a non-controlling ownership interest (“ASX Group”). The majority of ASX Group’s subsidiary companies are incorporated in Australia (including each of the ASX Group Reporting Entities), however one of the entities that ASX Group owns is incorporated in the USA.

ASX Group employed an average of 1,438 full-time equivalent (FTE) employees and contractors, with three of these employees located outside Australia.

For more information about our corporate structure, please refer to our [2025 Annual Report](#).



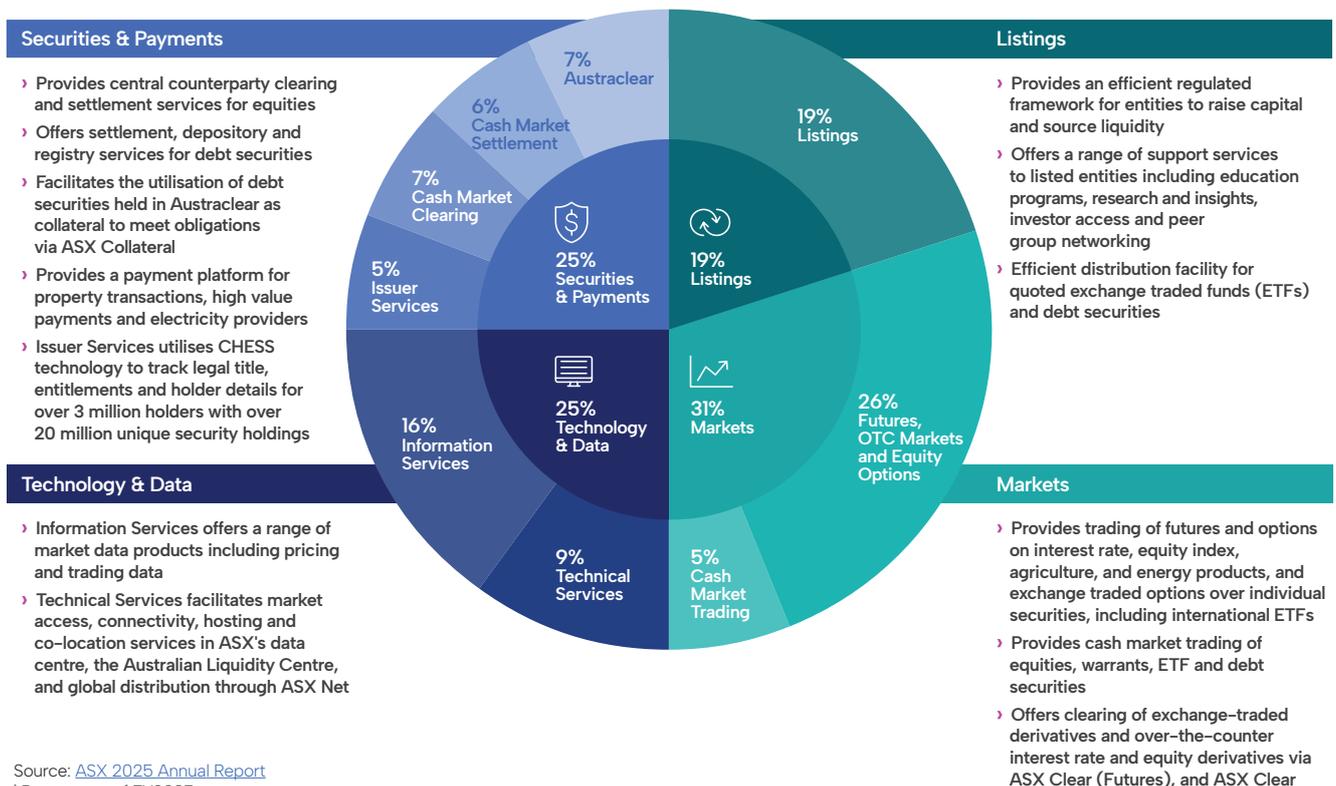
Our operations

ASX Group is a listed exchange group that offers listings, trading, clearing, settlement, technical and information services, technology, data, and other post-trade services.

It acts as a market operator, clearing house, and payments system facilitator. It oversees compliance with its operating rules, promotes standards of corporate governance among Australia’s listed companies, and helps to educate retail investors.

ASX Group operates markets for a wide range of asset classes including equities, fixed income, commodities, and energy. As an integrated exchange, ASX Group’s activities span primary and secondary market services, including the raising, allocation and hedging of capital flows, trading and price discovery, central counterparty risk transfer and securities settlement for both the equities and fixed income markets.

Figure 1: Diversified businesses – delivers revenue¹ across market cycles



ASX Group’s business is structured around four divisions: Listings, Markets, Technology & Data, and Securities & Payments.

In June 2023, ASX Group launched its ‘New Era’ 5-year strategy including our purpose, vision and strategic pillars. This strategy sets clear organisational goals and measures of success to deliver sustainable value to our customers, shareholders, and other stakeholders.

ASX Group operates primarily in Australia, with our head office located in Sydney. Regular operations are also undertaken by ASX Group entities out of office locations in New Zealand and the USA. In addition, ASX Group employees may briefly attend other countries from time to time as part of managing international customer activities.

More information about ASX Group can be found at asx.com.au



Our supply chain

In FY2025, ASX Group launched a new simplified Supplier Lifecycle Policy and Standard, harmonising the previous Vendor Management Framework, the Procurement Policy and the Critical Third Party Policy. The new Supplier Lifecycle Framework provides clarity on the ASX Group’s risk-based approach to sourcing, contracting and supplier management, including modern slavery.

The primary component of our supply chain includes the manufacture, delivery, installation, support, and maintenance of the technology required to operate our infrastructure and provide our services. Our supply chain also includes the suppliers of the various goods and services that contribute to our general operations – these include our property agents, insurance providers, external consultants, the companies that provide our kitchen supplies, stationery, the manufacturers of ASX Group uniforms and apparel, and our security providers.

During the FY2025 reporting period, our global supply chain included approximately 610 suppliers having their base of operations located in a total of 19 countries, including Australia, Belgium, Bulgaria, Canada, Czech Republic, France, Germany, Hong Kong SAR, India, Ireland, Japan, Luxembourg, Malta, New Zealand, Singapore, Sweden, Switzerland, the United Kingdom, and the USA. ASX Group acknowledges that a number of direct suppliers to ASX Group may have manufacturing facilities in countries other than their base country of operation.

ASX Group’s Tier 1, Tier 2, and largest spend suppliers provide essential goods and services to facilitate ASX Group’s operations.

These suppliers cover a range of industry sectors, including financial services, technology goods and services, telecommunications, risk management, and construction. ASX Group’s operations require uninterrupted access to the infrastructure that services our business. Therefore our core supplier relationships are often stable, long-term relationships, rather than short-term engagements.

Figure 2: ASX Group procurement spend by country

Country	Spend by % in FY2025
Australia	82.95%
United States of America	7.87%
United Kingdom	3.93%
Ireland	0.82%
New Zealand	0.82%
Singapore	0.82%
Hong Kong SAR	0.49%
France	0.33%
Sweden	0.33%
Other ¹	1.64%

¹Denotes countries with a collective spend of 1.64%: Belgium, Bulgaria, Canada, Czech Republic, Germany, India, Japan, Luxembourg, Malta, and Switzerland.

ASX Group’s supply chain is also comprised of other key direct suppliers operating in the industries of data infrastructure, external consulting, information technology, financial services (including technology), telecommunications, recruitment, insurance, energy (electricity and gas), property management, electrical installation services, offshore technology partners, and postal services.

Our supply chain also contained indirect suppliers that provided inputs and services to our direct suppliers. Examples of this include the manufacturers of uniforms and cleaning services used by our external contractors.

Our approach to protecting human rights through modern slavery risk practices

ASX Group uses the United Nations Guiding Principles on Business and Human Rights¹ (UNGPs) to help assess our modern slavery risk factors. The UNGPs establish an internationally recognised framework that explains that companies may cause, contribute or be directly linked to adverse human rights impacts through their business activities. This “continuum of involvement” is outlined below:

¹ Source: United nations Guiding Principles on Buisness and Human Rights

Figure 3: Adopting the United Nations Principles on Business and Human Rights

Cause	Contribute	Directly linked
Assessing any risk that may cause modern slavery if its actions directly result in modern slavery practices.	Assessing any risk that may contribute to modern slavery if its actions significantly contribute to modern slavery including where ASX Group performs acts or omissions that facilitate or incentivise modern slavery.	Assessing any risk that may be directly linked to modern slavery through the activities of another entity through which the ASX Group has a business relationship.



Potential for modern slavery risks in our operations as an employer

In FY2025, ASX Group employed an average of 1,438 full-time equivalent (FTE) employees and contractors with three employees located outside Australia. ASX Group’s workforce is augmented with various consultants and third-party providers. As such, we have the potential to cause modern slavery through our employment practices. We believe the inherent risk of this occurring is extremely low given the strong control frameworks and employment processes we have in place. These include:

- The existence of a Board-approved Modern Slavery Policy, which addresses modern slavery risks in our supply chain and operations and sets minimum standards for our employees for identifying modern slavery risks (see section titled ‘Our Modern Slavery Policy’ on the next page).

- The fact that the vast majority of ASX Group’s employees are employed in Australia, which is considered a low risk geography for modern slavery due to the existence of strong workplace and employment laws.
- Processes and controls to ensure prospective employees are engaged in a proper and lawful manner. These include pre-employment and visa checks and minimum terms and conditions that apply to all of our employees under our employment contracts.
- Our available grievance mechanisms (including an independently managed whistleblowing reporting service) to current and former employees, including contractors and temporary employees.
- The setting of clear expectations about behaviour and conduct through the ASX Code of Conduct and Appropriate Workplace Behaviours policies.



Our Modern Slavery Policy

ASX Group launched our Modern Slavery Policy in June 2020. It sets clear expectations for the ASX Board of Directors, key executives and all employees and applicable third parties, about their responsibilities for managing modern slavery risks in our business operations and supply chain.

Key requirements of the policy include:

- Business unit management must perform its operations in a way that mitigates the risk of modern slavery in its business and supply chain. This may include reliance on organisational controls as appropriate.
- Each contract owner must, as far as practicable, include in their operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.
- ASX Group's supplier policies and procedures should include specific prohibition of modern slavery.
- All new suppliers are to be subject to a risk-based due diligence assessment prior to on-boarding.
- Contract owners who manage existing supplier relationships must implement a risk-based approach to review the supplier's modern slavery risks and disclosures.



Potential for modern slavery risks in our supply chain

For consistency with the approach taken by ASX Group in previous reporting periods, we have mapped our supply chain and operations and established a baseline for identifying modern slavery risks. In order to inform our assessment of modern slavery risks that may be applicable to the operations and supply chain of ASX Group (including each of the ASX Group Reporting Entities), we continued to refer to modern slavery data and resources published by non-government organisations (NGOs) and international organisations such as the International Labour Organisation and Walk Free Foundation.

Based on the reporting data contained in these resources regarding the prevalence of modern slavery in certain regions and industries, we conducted an assessment that considered both the location and nature of our suppliers. We assessed that while ASX Group operates in a relatively low risk sector (being financial markets infrastructure), we have the potential to be directly linked to modern slavery through our supply chain.

The following components of our supply chain are key areas which could give rise to a risk that one or more ASX Group entities could be directly linked to modern slavery practices:

- Geography risks** — Suppliers located in high risk countries: Data provided by Walk Free Foundation in its [Global Slavery Index 2023](#) outlines the 10 countries which are considered to have the highest rates of prevalence of modern slavery across the globe. ASX Group has identified that none of our direct suppliers are from these countries. However, it is possible that some of our direct suppliers may obtain their own inputs from suppliers located in these countries, meaning that our ‘indirect suppliers’ are a key area of risk for ASX Group.

- Category risks** — Suppliers using offshore manufacturing: ASX Group sources stationery, ASX Group-branded uniforms and apparel, corporate merchandise, technological devices, and hardware from suppliers that we anticipate may use offshore manufacturers. As we do not have visibility over the locations of these offshore manufacturers, there exists a possibility that they may be located in countries reported by NGOs and international organisations to have a higher prevalence of modern slavery. In addition, the inputs and materials used by these offshore manufacturers may be sourced from suppliers located in countries with a high prevalence of modern slavery. For these reasons, suppliers using offshore manufacturers are another key risk area for the ASX Group.
- Sector risks** — Suppliers operating in high-risk industries: Data provided by Walk Free Foundation in its [Global Slavery Index 2023](#) suggests that despite the financial sector being perceived as low risk for human rights abuses, entities may unknowingly engage vulnerable workers through labour agencies in higher risk industries such as catering and cleaning services. Office cleaning services are used in each of the locations in which ASX Group has offices. ASX Group has low visibility over the supply chains of these cleaning services where such services are provided through ASX Group’s direct suppliers (such as building management). We have identified this as a key risk area for the ASX Group.

ASX Group recognises the importance of monitoring and mitigating the above key-risk areas to help ensure that no ASX Group entities are directly linked to modern slavery practices through ASX Group’s operations and supply chain.

Our actions taken to address the risks of modern slavery practices in our supply chain



Due diligence

ASX Group seeks to ensure that we only engage with suppliers that share our values about the prevention of modern slavery practices. To this end, ASX Group performs mandatory due diligence on our suppliers to assess our potential exposure to the risk of modern slavery for each supplier, and mitigate the risk of modern slavery being present in our supply chain.

During the FY2025 reporting period, the due diligence processes and controls in operation included the following:

Risk assessments:

- ASX Group conducted risk assessments in accordance with our Modern Slavery Policy. Our approach, as outlined in Figure 4 on the next page, will continue to be refined based on best practice and our own learnings over time.
- We performed risk assessments on suppliers (where ASX Group's proposed spend is above \$50,000 or where the supplier is identified by ASX Group as being in a high-risk industry) to assess the supplier's level of modern slavery risk.
- While drafting this statement, we identified that 81 assessments were not undertaken during the FY2025 reporting period. Steps have since been taken to perform these assessments and ensure there isn't a recurrence, including further employee training and enhanced reporting.
- We utilised Bureau Van Dijk (BvD) service and tools to detect, assess and monitor risks associated with modern slavery throughout our supply chain. The risk assessment tools help ASX Group identify and verify entities to be screened for risks relating to modern slavery prior to agreeing to a contract and for the duration of a contract agreement.
- We also continued our risk assessment and categorisation of existing suppliers in regard to modern slavery risk.
- This risk assessment process for both new and existing suppliers included:
 - vetting supplier policies or published statements to understand the modern slavery risks in their operations and supply chains, and how they typically seek to address any identified modern slavery risks
 - engagement of a third party data service to provide independent scores for proposed new suppliers based on the supplier's levels of human rights protections within its own operations and supply chains, and
 - categorisation of a supplier into a defined risk tier.

- Categorisation of a supplier into a particular risk tier triggered an associated risk management action for ASX Group, each of which are detailed against the relevant category below and outlined in Figure 4:
 - **High Risk:** resulting in requirement for immediate engagement with supplier and review of modern slavery risk assessment within 3 months of identification of High Risk status.
 - **Medium Risk:** resulting in requirement for review of modern slavery risk assessment within 12 months of identification of Medium Risk status.
 - **Low Risk:** resulting in requirement for review of modern slavery risk assessment within 3 years of identification of Low Risk Status.

We completed 169 modern slavery risk assessments for FY2025 on our base of suppliers where ASX Group's spend was above \$50,000, or where the supplier was identified as being in a high-risk industry. The 169 assessments include the additional 81 assessments undertaken in early FY2026 to remediate the assessments missed in FY2025.

This is in addition to risk assessments completed over the previous three financial years. The total number of suppliers with active Modern Slavery Risk Assessments at the time of writing this statement was 425. As of this date the ASX Group recorded nine high, 32 medium and 384 low risk assessments. When suppliers have high risk assessments, the ASX Group work with these suppliers to seek clarification and validation of ASX Group's initial assessment.

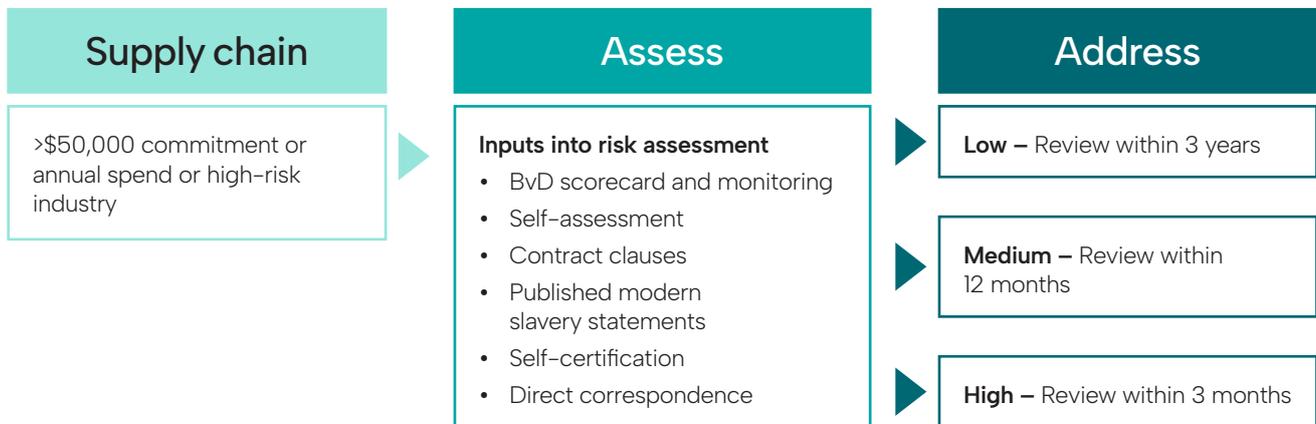
Supplier dialogue:

- During FY2025, we have continued to embed into our procurement processes the expectation that ASX Group engages in dialogue with proposed suppliers. This dialogue helps us understand the nature and levels of modern slavery risks inherent in their operations and supply chains. We also seek to learn how suppliers typically address any identified modern slavery risks.

Contractual requirements:

- ASX Group continued to request that new suppliers include ASX Group's standard modern slavery clauses in any contracts for goods or services. Suppliers are required to confirm that they have reviewed their own operations and supply chains. They must also state that they are not aware of any instances of modern slavery occurring within them.
- ASX Group also continued to identify existing supplier arrangements where there is a need to incorporate ASX Group's standard modern slavery clauses at the time of extension, renewal or variation of the relevant contract.

Figure 4: ASX Group approach to addressing modern slavery risk¹



¹ This figure in the FY2024 ASX Group Modern Slavery Statement included a box for <\$50,000, which was included in error.



Key policies addressing modern slavery risks:

- ASX Group has developed a Modern Slavery Policy which articulates ASX Group’s commitment to identifying and addressing risks of modern slavery occurring in our operations or supply chain, and provides guidance to employees with respect to the identification and assessment of any modern slavery risks.
- The Modern Slavery Policy is reviewed in accordance with ASX Group’s risk and compliance frameworks to ensure it remains fit for purpose and relevant to our operations and supply chain.
- Various existing ASX Group policies and procedures continued to provide additional safeguards for ASX Group stakeholders in respect to identifying and addressing modern slavery risks. These documents are also reviewed in accordance with ASX Group’s risk and compliance frameworks to ensure they remain fit for purpose and relevant to our operations and supply chain.
- ASX Group’s Whistleblower Protection Policy provided, and continues to provide, an avenue for all eligible whistleblowers to identify and address modern slavery risks by raising concerns at ASX Group about misconduct or an improper state of affairs or circumstances, including matters concerning modern slavery.

Figure 5: Modern Slavery Policy and related policies

Policy	Description	How this supports mitigation of modern slavery risk
Modern Slavery Policy	Addresses modern slavery risks within the supply chain and business operations and sets minimum standards for employees with respect to the identification of modern slavery risks.	Supports ASX Group's expectation that contracts with third parties should contain specific clauses relating to modern slavery, and requires accountable employees to conduct modern slavery risk assessments where certain criteria are met.
Supplier Code of Conduct	Sets ASX Group's expectations on how suppliers act in relation to corporate governance and ethics, workplace health and safety, environmental practices, employment practices, risk management, and diversity.	Supports ASX Group's expectation that it should only contract with suppliers with credible and evidenced commitments to practices that minimise instances or risks of modern slavery.
Supplier Lifecycle Framework	Sets the framework for effective supplier lifecycle practices.	Reinforces the need for supplier activities to align with the Modern Slavery Policy and commitments made in the published annual ASX Group Modern Slavery Statement.
Whistleblower Protection Policy	Provides information to assist staff to make disclosures and sets out how ASX Group will protect them from any form of retaliation or victimisation when they make a legitimate whistleblowing disclosure.	Supports people to raise concerns about misconduct or an improper state of affairs or circumstances, including matters concerning modern slavery.
ASX Code of Conduct	Underpinned by the ASX Group values, the Code of Conduct applies to all directors, employees and contractors.	Sets the standards for how we work at ASX Group and outlines the importance of our corporate values to anyone dealing with ASX Group.
Appropriate Workplace Behaviours	Outlines what ASX Group considers inappropriate or unlawful conduct. This policy applies to all directors, employees, contractors or volunteers.	Sets standards of behaviour for all our people, obligations in relation to identifying and assessing the risk of relevant unlawful conduct occurring, implementing effective control measures, and reviewing and monitoring these.
Anti-bribery and Corruption Policy	Addresses ASX Group's commitment to maintaining a high standard of integrity across all business dealings, and includes ASX Group associates and suppliers.	Supports employees and associates of ASX Group, including suppliers, to adhere to practices that promote ethical business behaviours and practices.
Workplace Health, Safety and Wellbeing Policy	Details ASX Group's commitment to health, safety and wellbeing, and how ASX Group conducts its business having regard to all Workplace Health and Safety (WHS) laws, regulations, standards and codes of practices.	Sets out the obligations both ASX Group, and its employees, have regarding all work health, safety and wellbeing.



Training and awareness:

- ASX Group continues to mandate Modern Slavery Risk Awareness training for all ASX Group employees.
- Procurement employees at ASX Group were required to complete the “Identifying and Assessing Modern Slavery Risks” and “Managing Modern Slavery Risks” training courses during FY2025.
- Awareness of modern slavery assessment requirements were raised to the contract owner community during training in Q3 FY2025 to embed the new Supplier Lifecycle Framework and in Q4 FY2025 during a quarterly contract owner forum.
- We publicise our values with respect to modern slavery to those outside ASX Group through publishing our Supplier Code of Conduct, Modern Slavery Policy and annual Modern Slavery Statement on the ASX Group website.



Remediation

ASX Group recognises the importance of appropriately addressing situations where it is found that one or more ASX Group entities have caused or contributed to modern slavery. To this end, during the FY2025 reporting period we maintained a robust remediation process, which is captured in our Modern Slavery Policy, and bolstered by existing ASX Group policies such as our Supplier Code of Conduct and Whistleblower Protection Policy.

Our risk and compliance frameworks require that, where ASX Group becomes aware that any one or more of our direct suppliers is causing or contributing to modern slavery in their operations or supply chains, ASX Group will engage directly with that supplier to:

- investigate the circumstances surrounding the reported occurrence, and
- develop and agree an appropriate remediation action plan with that supplier.

Remediation action plans will primarily focus on the prevention of any recurrences of the relevant supplier’s actions that have been found to cause or contribute to instances of modern slavery. ASX Group recognises that the circumstances surrounding reported instances of modern slavery may vary greatly, and so remediation action plans will be developed on a case-by-case basis having regard to the circumstances of the reported occurrence and of the relevant direct supplier.

Where a supplier reports an incident or, in ASX Group’s view, subsequent supplier risk assessments demonstrates the existence of an unacceptable level of modern slavery risk to ASX Group we will attempt to work with the supplier to implement an effective and meaningful remediation action plan. Should the supplier refuse to cooperate, ASX Group will seek to take further action, which may include termination of the supplier relationship where necessary and appropriate.



Contract terms and conditions

During the previous reporting periods we introduced a new clause into the standard form supplier agreement. This clause requires the relevant supplier to provide a warranty to ASX Group that they themselves do not engage in modern slavery practices. New Suppliers are required to report on their due diligence in their operations and supply chain within the last 12-month period. They are required to identify risks and provide satisfactory evidence that there are no instances of modern slavery in their supply chains as of the date of the agreements.

The clause also requires that suppliers undertake to provide ASX Group with an updated attestation of these matters on an annual basis, and to notify ASX Group within five business days in the event that they become aware of any instances of modern slavery occurring in their operations or supply chains. During the FY2025 reporting period, we continued to roll out these amended standard form supplier agreements for new suppliers and existing suppliers upon contract renewal cycles.

This practice is standard procedure as part of ASX Group policy to manage modern slavery risks.

Effectiveness of actions taken

ASX Group recognises the importance of regularly assessing the effectiveness of the actions we are taking to manage modern slavery in our operations and supply chain, and the need for review of the way we measure the impacts of these actions.

Below are some of the key data points that highlight the effectiveness of ASX Group's actions to manage modern slavery risks.

Figure 6: Training and awareness

Training programs	Eligible employee completion rate	
	FY2025	FY2024
Modern Slavery	99.77%	N/A – Module deployed every 2 years
Code of Conduct	99.39%	99.82%
Respectful, Safe and Inclusive Workplace	99.77%	N/A – Module first deployed in FY2025
Whistleblower Protection	99.89%	N/A – Module deployed every 2 years
Modern Slavery training for Procurement employees	100%	100%

Figure 7: Completion of modern slavery risk assessments

Suppliers assessed	Assessments completed	
	FY2025	FY2023 to FY2024
Total of Suppliers assessed	425 ¹	344 ²

¹ This includes the additional 81 assessments undertaken in early FY2026 to remediate the assessments missed in FY2025.

² This figure excludes suppliers that have been reassessed in FY2025.



Effectiveness of modern slavery actions

The effectiveness of our modern slavery focus is enabled by ongoing actions within our business, which include:

- conducting a regular review of our Modern Slavery Policy to ensure it remains fit for purpose and relevant to our operations and supply chain
- capturing and recording all identified breaches of ASX Group's Modern Slavery Policy (as well as identified breaches of any other ASX Group policies and procedures relating to modern slavery) in ASX Group's breach register
- maintaining a compliance framework through which modern slavery related risks and concerns (as well as breaches) may be escalated to ASX Group's Risk Committee and reported to relevant ASX Group board committees as necessary, and

- reporting suppliers with 'High Risk' ratings via the ASX Group's internal risk management tool and managing them appropriately to minimise any potential business continuity impact, consistent with our Modern Slavery Policy.



Effectiveness challenges and mitigation

In the FY2025 reporting period, ASX Group experienced process challenges in identifying all new suppliers that required modern slavery assessments. As a result, 81 modern slavery assessments were not undertaken. These assessments have since been completed, and processes, controls and reporting requirements are being reviewed and improved to avoid recurrence.

Governance

Formal governance of modern slavery risks occurs through the ASX Limited Board that approves the annual Modern Slavery Statement. Further governance practices are in place that include:

- an internal reporting facility to capture and record all identified breaches of ASX Group's Modern Slavery Policy (as well as identified breaches of any other ASX Group policies relating to modern slavery) in ASX Group's existing breach register
- escalation processes for modern slavery-related risks and concerns (as well as breaches) to ASX Group's Risk Committee and relevant ASX Group Boards and/or board committees as necessary, and
- the Sustainability Working Group was implemented in FY2025 with a monthly cadence, to discuss various sustainability-related matters including modern slavery.



Consultation

This statement was developed by the ASX Group Reporting Entities in consultation with each of the wholly-owned subsidiaries of the ASX group of entities. It should be noted that all ASX Group entities are subject to ASX Group policies, procedures and systems, and are party to group-wide information and resource-sharing arrangements. Accordingly, the information (including supplier information) detailed in this statement is applicable to all ASX Group entities.

Future actions on modern slavery

Figure 8: FY2026 Priorities

Theme	FY2026 priorities
Assessing effectiveness	Continue to review and improve the way in which the ASX Group measures and reports the effectiveness of our actions to mitigate modern slavery risks.
	Review the effectiveness of grievance mechanisms for non-ASX employees.
Strengthening governance and reporting	Improve governance, processes, controls and reporting to ensure modern slavery assessments are undertaken in a timely manner.
	Continue to include modern slavery clauses as part of ASX Group’s standard contract renewal process.
Managing risks	Raise awareness of modern slavery supply chain risks during quarterly contract owner forums.
	Incorporating modern slavery supply chain training in mandatory contract owner training.

This statement was approved by the Boards of each of the ASX Group Reporting Entities on or about 28 November, 2025.

Signed for and on behalf of the Board of ASX Limited:



HELEN LOFTHOUSE
Director, ASX Limited

Signed for and on behalf of the Board of ASX Operations Pty Limited:



HELEN LOFTHOUSE
Director, ASX Operations Pty Limited

Signed for and on behalf of the Board of ASX Clearing Corporation Limited:



HELEN LOFTHOUSE
Director, ASX Clearing Corporation Limited

Signed for and on behalf of the Board of ASX Clear (Futures) Pty Limited:



HELEN LOFTHOUSE
Director, ASX Clear (Futures) Pty Limited

Signed for and on behalf of the Board of ASX Clear Pty Limited:



HELEN LOFTHOUSE
Director, ASX Clear Pty Limited

Signed for and on behalf of the Board of ASX Settlement Corporation Limited:



HELEN LOFTHOUSE
Director, ASX Settlement Corporation Limited

Signed for and on behalf of the Board of ASX Settlement Pty Limited:



HELEN LOFTHOUSE
Director, ASX Settlement Pty Limited



Australian Modern Slavery Act mandatory reporting criteria	Reference in this statement
Identify the reporting entity. Describe the reporting entity's structure, operations and supply chains.	Pages 2-4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 5-7
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.	Pages 8-11
Describe how the reporting entity assesses the effectiveness of such actions.	Page 12
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Page 13
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Page 14

Further information

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1. For the cost of a local call from anywhere in Australia.

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