

# Modern Slavery Statement

DATED 16 July 2021  
in respect of the  
reporting period  
from 1 July 2020  
to 30 June 2021

EXCHANGE CENTRE  
20 BRIDGE STREET



# Introduction

This Modern Slavery Statement is a joint statement made on behalf of:

- **ASX Limited**  
(ABN 98 008 624 691) (ASX Limited),
- **ASX Operations Pty Limited**  
(ABN 42 004 523 782) (ASXO),
- **ASX Clearing Corporation Limited**  
(ABN 45 087 801 554) (ASXCC) and
- **ASX Clear (Futures) Pty Limited**  
(ABN 91 050 615 864) (ASXCF),

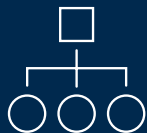
(collectively referred to as the ASX Group Reporting Entities), pursuant to the requirements of the Modern Slavery Act 2018 (Cth). This statement relates to the reporting period commencing 1 July 2020 and ending 30 June 2021.

This Statement addresses the steps that the ASX Group Reporting Entities have taken during the relevant reporting period to identify and address modern slavery risks within the supply chain of the ASX Group Reporting Entities, and outlines the measures that the ASX Group Reporting Entities will take over the course of subsequent reporting periods to continue to improve our practices to combat modern slavery.

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 (ASX Group). 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. Consultation with each of the wholly-owned subsidiaries was conducted through the sharing of relevant supplier information and financial reporting information.



# ASX Group – operations, structure and supply chain



## OUR STRUCTURE

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

As disclosed at the most recent half-year results, ASX Group employed 742 full-time equivalent permanent staff (FTE) as at 31 December 2020, of which 4 FTE were located outside Australia.

For more information about our corporate structure, please refer to our 2020 Annual Report.



## OUR OPERATIONS

ASX Group is an integrated exchange operating a significant part of the infrastructure that supports Australia's financial markets. ASX Group offers listing, trading, clearing and settlement services, technical and information services, and other post-trade services for a wide range of asset classes, including equities, fixed income, commodities and energy.

Companies, corporates and issuers of capital from Australia and around the world engage with ASX Group to raise capital to grow and manage risk. Through providing data and technical services to intermediaries, banks, information vendors, and software developers, ASX Group helps these entities to make informed decisions, to provide services to their clients and to connect with one another.

ASX Group is one of the world's top-10 listed exchange groups measured by market capitalisation. While we are based in Australia, which has one of the four largest investable asset pools in the world, we have trading and information hubs across the world, and attract company listings from all around the globe.

ASX Group's operations also comprise our general marketing and sales activities (including investor education programs), business development activities, and financial investments made by ASX Group.

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 its international customer activities.



## OUR SUSTAINABILITY APPROACH

Continuing to generate long-term value for all our stakeholders is central to ASX's ability to operate at the heart of Australia's financial markets.

We recognise that as a market operator it is critical that we lead by example, with good corporate governance and effective risk management. We are committed to being a responsible citizen and having engaged and energised people. In addition as a provider of critical financial infrastructure we have a responsibility to support the integrity of our markets and encourage innovation for the benefit of all Australians.

Our sustainability approach is centred on the three pillars of having trusted actions, resilient operations and supporting efficient markets.

These pillars are underpinned by six building blocks, one of which is the adoption of ethical business practices which captures our commitment to doing the right thing by our stakeholders and the communities in which we operate. We see our efforts in identifying and addressing risks of modern slavery in our operations and supply chain as an important aspect of building long-term, sustainable supplier partnerships.



## OUR SUPPLY CHAIN

Our primary supply chain includes the manufacture, delivery, installation 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 and stationery, the manufacturers of ASX uniforms and apparel, and our security providers.

During the reporting period, our global supply chain comprised approximately 500 direct suppliers from a total of 15 countries, including Australia, the USA, Ireland, Sweden, Belgium, Luxembourg, Singapore, England, Hong Kong, New Zealand, Czech Republic, China, France, Canada and Switzerland.

Approximately 16% of ASX Group's total supplier spend during the reporting period was attributed to 12 key suppliers providing critical services to facilitate ASX Group operations, (such suppliers referred to as "Critical Service Providers"). These Critical Service Provider relationships include direct suppliers from a number of industry sectors, being: financial services, telecommunications, technology (primarily financial services technology), and risk management. Given the nature of ASX Group's operations and the resulting need for uninterrupted access to the critical infrastructure that services our business, our key supply relationships described above are typically structured as stable, long-term relationships, rather than short-term arrangements.

In addition to our Critical Service Providers described above, ASX Group's supply chain is also comprised of other key direct suppliers operating in the industries of data infrastructure, consulting, technology (primarily financial services technology and information technology), financial services, telecommunications, recruitment, insurance, energy (electricity and gas), property management, electrical installation services, and postal services.

Our supply chain also comprises the indirect suppliers that provide inputs and services to the direct suppliers of ASX Group, such as the manufacturers of the uniforms that we source from our suppliers and the cleaning services used by our external consulting firms.



# Our assessment of risks of modern slavery in our operations and supply chain

During the FY2020 reporting period, ASX Group conducted an internal review of the top suppliers in our operations and global supply chain with respect to 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 referred to modern slavery data and resources published by non-government organisations (NGOs) and international organisations such as the International Labour Organisation and the Walk Free Foundation.

Based on the reporting data contained in these resources around the prevalence of modern slavery in certain regions and industries, and having regard to the location and nature of our suppliers, we assessed that while ASX Group operates in a low risk sector (being financial markets infrastructure), the following areas of our supply chain are key risk areas:

- ASX Group sources stationery, ASX-branded uniforms and apparel, and 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.

- 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's direct suppliers (such as building management).

Following this assessment, ASX Group considered that these components of our supply chain could give rise to a risk that one or more ASX Group entities could be linked to modern slavery practices.

As a result, we have conducted further risk assessment activities with selected suppliers during the current reporting period (see section titled "Our Response to Modern Slavery Risks - Due Diligence" for more information on this).

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 response to Modern Slavery Risks – Due Diligence

## Detailed risk assessment of existing suppliers

During the reporting period, ASX conducted risk assessments on the following supplier tiers that (as at the date of this statement) collectively represent ~51% of our total supplier spend:

1. Critical Service Providers and “Tier 1 Suppliers” (being those suppliers considered as fully integrated within our operations and key to our long-term strategies); and
2. Our “High Risk” suppliers (being those suppliers identified as having elevated modern slavery risks due to industry, product or, country of operation)

This review included requesting suppliers to complete a questionnaire for assessment by either ASX (internal assessment) or a third party organisation (external assessment). Based on the information provided by suppliers through this process, we then categorised our suppliers into the following modern slavery risk response categories:

- “High Risk” (requires immediate further review)
- “Medium Risk” (annual review)
- “Low Risk” (2-3 year review)

ASX Group will continue, in subsequent reporting periods, to work with the balance of our suppliers in assessing modern slavery risks and any actions to address such risks.

## Achieving adherence to our values



### NEW SUPPLIERS

ASX Group want to ensure that we only seek to engage with new suppliers that share our values with regard to addressing and preventing instances of modern slavery in our operations and supply chain. As part of our initiative to identify, prevent, mitigate and account for modern slavery risks in our supply chain, we have mandatory due diligence processes which are followed wherever we look to commence a new supplier or contractor relationship. These due diligence processes involve early requests by ASX Group for disclosure by the proposed supplier of documents relating to their modern slavery risks and policies, and, where necessary, engaging in dialogue with proposed suppliers in order to understand the levels of modern slavery risks inherent in their respective operations and supply chains, and how they typically seek to address any identified modern slavery risks.

To ensure that any new strategic suppliers of ASX Group are aligned with our values surrounding the prevention of modern slavery, during the FY2020 reporting period we introduced into standard form supplier agreements a new clause under which the relevant supplier provides a warranty to ASX Group that they themselves do not engage in modern slavery practices, that they have conducted due diligence on their own operations and suppliers within the last 12 month period, and that they have addressed any identified risks and are reasonably satisfied that there are no instances of modern slavery in their supply chains as at the date of the agreement. The clause also requires that suppliers undertake to provide ASX Group with an updated certification of these matters on an annual basis, and to notify ASX Group within 5 business days in the event that they become aware of any instances of modern slavery occurring in their operations or supply chains. During the current reporting period we have introduced the new clauses into further standard form supplier agreements for new suppliers of ASX Group.



### EXISTING SUPPLIERS

ASX Group are committed to adherence to our modern slavery-related terms by our existing suppliers. Accordingly, activities in this reporting period shifted from the introduction of policies and frameworks to working directly with our existing suppliers to commence risk assessments (see section titled "Detailed risk assessment of existing suppliers" on page 6). ASX Group has also commenced engagement with existing suppliers to request that relevant existing supplier contracts due for review or renewal be amended to incorporate our modern slavery related terms, and will continue to engage with suppliers on this matter in subsequent reporting periods.

### Our modern slavery policy framework and modern slavery statement

At ASX Group we are committed to minimising any risks of modern slavery occurring within our operations and supply chain, and communicating our values in this regard throughout the organisation and among the general public. To reflect this, our internal company Modern Slavery Policy articulates ASX Group's commitment to identifying and addressing risks of modern slavery occurring in our operations or supply chain, and provides guidance to staff with respect to the identification and assessment of any modern slavery risks.

In addition, various ASX Group policies and procedures (such as our Supplier Code of Conduct, Procurement Policy, Vendor Management Framework and RFP documentation) provide additional safeguards in respect to identifying and addressing modern slavery risks.

Furthermore, ASX Group's internal Whistleblower Protection Policy provides 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.

We publicise our values with respect to Modern Slavery to those outside ASX Group through publishing our annual modern slavery statement on the ASX website.



## Our response to Modern Slavery Risks – 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 reporting period we maintained a robust remediation framework, 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 remediation framework encourages both internal and external stakeholders to report to ASX Group any reasonably suspected instances of modern slavery occurring within our operations or our supply chain. Our framework requires that where ASX Group becomes aware that any one or more of its 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 direct supplier reports an incident or in ASX Group's view, supplier risk assessments represent an unacceptable risk to one or more of ASX Group's policies and procedures due to its direct or indirect involvement in modern slavery, and does not agree to work with ASX Group to implement an effective and meaningful remediation action plan, ASX Group will seek to take further action, which may include termination of the supplier relationship where necessary and appropriate.



# Measuring our effectiveness in combating modern slavery

ASX Group recognises the importance of regularly assessing the effectiveness of the actions we are taking to combat modern slavery in our operations and supply chain. In order to measure our effectiveness in this area, we have committed to:

- 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 existing breach register;
- maintaining a framework within our existing enterprise compliance processes 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;
- defining and measuring Key Risk Indicators related to completion of modern slavery assessments for new suppliers and current suppliers, and metrics associated with remediation and mitigation efforts to minimise any potential business continuity impact, consistent with our Modern Slavery Policy.



# Further steps/ future actions

We are committed to further improving our response to modern slavery risks in our operations and supply chain. In our next reporting period we will look to continue expanding our response by:

- undertaking a review of the effectiveness of steps we have taken in this reporting period;
- continuing discussions with suppliers identified as being of a higher risk in respect of modern slavery to request a remediation action plan, incorporation of our new standard modern slavery related term into existing contracts and obtaining the annual certification.
- continuing to enhance existing ASX Group training materials (both for new starters and for existing employees as part of the mandatory annual training and development modules) to foster awareness of modern slavery risks and the skills required to effectively identify and report on instances of risks of modern slavery, wherever they may occur in our operations or supply chain.

This statement was approved by the boards of directors of each of the ASX Group Reporting Entities on or about 16 July, 2021.

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



**DOMINIC STEVENS**  
Director, ASX Limited

---

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



**DOMINIC STEVENS**  
Director, ASX Operations Pty Limited

---

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



**DOMINIC STEVENS**  
Director, ASX Clearing Corporation Limited

---

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





**DOMINIC STEVENS**  
Director, ASX Clear (Futures) Pty Limited

## Further Information

ASX Customer Service Centre  
Mon-Fri 8.30am – 6.00pm (AEST)  
excluding public holidays

**T** +61 2 8973 3625

**E** [info@asx.com.au](mailto:info@asx.com.au)

 Follow us on LinkedIn  
 Follow us @ASX  
[asx.com.au](http://asx.com.au)

