



# Modern Slavery Statement

## 2022



# Introduction



## Acknowledgment of Country

We 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

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**).

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 covers the wholly-owned subsidiaries listed in Appendix A. This Statement addresses our efforts in regard to modern slavery for the financial year 1 January 2022 to 31 December 2022 (**the reporting period**). In this Modern Slavery Statement, the terms "Iress", the "Company", "our business", "organisation", "we", "us", and "our" refer to Iress Limited, unless otherwise stated.

# Structure



## Structure, reporting entities & the process of consultation

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 A.

During the reporting period, Iress actively engaged and consulted with the Reporting Entities in the preparation of this Joint statement noting that all Iress subsidiaries including those that are reporting entities are wholly-owned and fall under one management structure, policies and governance arrangements. In addition:

- 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 Legal Officer as a representative of the Modern Slavery Working Group.
- Additionally, throughout the reporting period, senior managers were consulted via the Modern Slavery Working Group 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.
- All Iress entities strictly comply with the same International Financial Reporting Standard dictated by the Iress Group Reporting department and therefore assurance auditors audit the Iress entities in the same scope.
- In 2022 we conducted a materiality assessment with a newly developed topic universe. We surveyed

our people, shareholders and clients to understand the role Iress should play in a range of environment, social and governance topics. This process was informed by the GRI Standards, Sustainable Development Goals (SDGs), Sustainability Accounting Standards Board (SASB) software and IT services sector standard, and Iress internal documents. Modern slavery, forced labour and sustainable procurement remains a material topic for Iress to address in reporting and future strategic planning.

# 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 over 2,000 people and has offices in Australia, Canada, France, New Zealand, Singapore, South Africa, Tunisia, the United Kingdom and the United States of America.

## People by contract & region

	Permanent	Fixed term	Contractor	Total
Australia	1153	59	49	1261
Canada	57	0	0	57
France	40	0	3	43
New Zealand	25	1	0	26
Remote *	0	0	158	158
Singapore	34	0	0	34
South Africa	200	1	1	202
Tunisia	23	0	0	23
United Kingdom	672	2	13	687
United States of America	5	0	0	5
<b>Grand Total</b>	<b>2209</b>	<b>63</b>	<b>224</b>	<b>2496</b>

\*Remote is defined as a contractor who's primary location is not an Iress office. The remote workers mentioned above are based in India (102) & the Philippines (56).

## Our 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:

<b>Financial advice</b>	<b>Trading &amp; market data</b>	<b>Investment management</b>	<b>Superannuation</b>	<b>Mortgages</b>	<b>Life &amp; pensions</b>
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## Supporting our communities

Iress Impact (formerly Iress Foundation) was established in 2017 to support charities, predominantly through fundraising and workplace giving. The guiding principles established in 2017 remain relevant today: facilitate, support and promote people engagement and make a visible, reliable, and meaningful contribution to partner charities. We have aligned Iress Impact's mission to the following United Nations Sustainable Development (SDG) goals:

- **Quality education** - with a focus on STEM education (SDG 4).
- **Decent work** - with a focus on displaced people and refugees (SDG 8).
- **Partnership for the goals** - through the provision of services to charities (SDG 17).

More information about Iress Impact can be found in Iress' 2022 ESG report, available [here](#).

In 2022, Iress expanded its partnership with Talent Beyond Boundaries (TBB) to provide more reliable and meaningful support to their work and efforts. The expanded partnership includes a fixed financial agreement of \$750,000 over five years, in addition to pro-bono technical volunteering and communications and marketing support to further promote the benefits of TBB's skilled migration program in Australia and around the world.

# Supply chain

Iress has over 1600 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 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

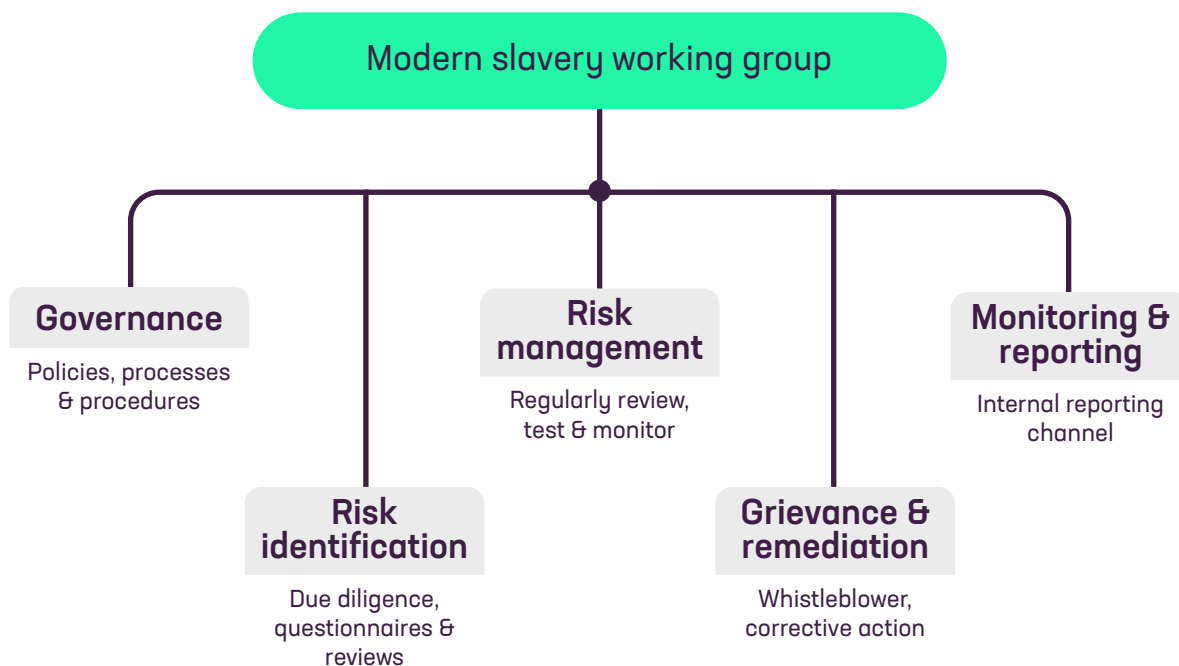
(location based on business operating address)

Country	Suppliers (numbers)	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%

# Modern Slavery Framework

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' 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. The framework also provides Iress with the ability to assess the effectiveness of actions taken to manage modern slavery risks over time.



# Governance

Iress operates under a set of well-established corporate governance policies and processes that reinforce the responsibilities of all directors, officers, and our corporate entities as set out in the Corporations Act 2001 (Cth) (Corporations Act) and the Listing Rules of the Australian Securities Exchange (ASX).

Many of these governance elements are also embedded in our Constitution. The Iress Board operates in

accordance with a Board Charter and has ultimate responsibility for setting strategy and policy for the Group globally.

We believe that adopting a high standard of corporate governance is essential to sustainable long-term performance and value creation. The governance structure we have put in place to support ESG includes modern slavery considerations:

<b>Iress Board</b>	To oversee and consider recommendations from the Audit & Risk Committee and approve the annual Modern Slavery Statement. The Board is offered modern slavery training and updates on human rights initiatives through management papers.
<b>Audit &amp; Risk Committee</b>	The Committee is responsible for reviewing and monitoring the operational, regulatory, and reputational risks and impacts of ESG including human rights on the Company and providing insight and guidance with respect to the Company's management of such risks and impacts.
<b>CEO &amp; Leadership team</b>	Approves the ESG strategy and annual plan including human rights initiatives. Monitors the progress of the plan on a quarterly basis.
<b>Chief Legal Officer</b>	Oversees the management of strategic initiatives including the Modern Slavery Working Group.
<b>ESG function</b>	Works across the business to coordinate and support the delivery of initiatives.



## 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—suppliers who do not pose a risk of modern slavery within our supply chain.

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

Policy	Outline
Whistleblower	Iress' Whistleblowing Policy allows eligible individuals including third-party vendors and their employees to raise concerns including modern slavery or human rights abuses in a confidential manner. The policy includes the provision of an external provider, 'Your Call Whistleblowing Solutions'.
Equality, diversity & inclusion	Iress is committed to fostering a diverse, inclusive and equal business outlined in the Global Diversity Policy, Gender Diversity Objectives and our annual reporting to the Workplace Gender Equality Agency (WGEA). In South Africa, in line with Employment Equity legislation, Iress has developed a three-year employment equity plan, produced an annual report and held quarterly employment equity committee meetings.
Workplace discrimination, bullying & harassment	Iress is committed to fostering a workplace free from workplace discrimination, bullying, harassment, sex-based harassment, and victimisation. Every member of our organisation has a right to feel safe and respected, and in turn the responsibility to prevent workplace discrimination, bullying, harassment, and victimisation.
ESG	In 2021 we developed our environmental, social and governance (ESG) strategy. We are committed to observing internationally-recognised risks, such as climate change and modern slavery, and acting on these as part of our ESG roadmap
Health & safety	Iress operates a Health & Safety (H&S) 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 H&S of our offices, and protect our staff on a global basis.
Information security	Information security is the fundamental discipline of ensuring the confidentiality, integrity, and availability of our systems and data. We employ four key information security frameworks at Iress, in addition to other standards and audit frameworks required for specific areas of the business, for example ATO, SWIFT and ASAE3402. ISO/IEC 27001:2013 certification until April 2025 which requires organisations to put in place a broad range of internal information security risk controls designed to reduce the likelihood and impact of information security incidents (whether innocent or malicious), if and when they occur.
Anti-bribery and corruption policy	During 2022 we revised our risk management framework to improve our management of enterprise risks, including corruption, which is generally considered low risk. To operationalise the revised framework, a new methodology for capturing and reporting risks is being introduced across our organisation. Iress will conduct an analysis of our exposure to corruption once the program is completed.

# Risk



As a global technology company and licensed financial services business, risk (positive or negative) is inevitable in order for Iress to achieve success. Therefore, Iress' risk management culture is one that proactively identifies, manages, and mitigates risk, including modern slavery, so the organisation can learn from risk events and continuously anticipate emerging risks.

Iress' Risk Management Framework, underpinned by the principles outlined in ISO 31000: 2018 - Risk Management Guidelines, aims to foster risk management capabilities and culture at all levels throughout the enterprise that allows us to identify early warning signals, escalate information and fully appreciate the risks impacting our organisation. Importantly, the benefits associated with a robust Framework include fewer surprises, reduced impact, more efficient decision making and sound governance.

## Risks in our operations

Based on our assessment of operations and an evaluation of hiring practices and employment terms, internal employee operations were considered as presenting a low to very low risk for modern slavery. Iress has engaged human rights consultants to support risk identification in 2023. The following are known risks in the industry sectors applicable or relevant to Iress' operations:

Location	Industries	Modern slavery risk/indicators of modern slavery
Asia Pacific	<ul style="list-style-type: none"> <li>● Physical services (cleaning, catering &amp; security)</li> <li>● Offshore professional services</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> <li>● Offshore services in the Philippines &amp; India present a higher geographical risk due to weaker local worker protection, as well as using temporary or foreign workers</li> </ul>
North America	<ul style="list-style-type: none"> <li>● Physical services (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>
Europe	<ul style="list-style-type: none"> <li>● Physical services (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>
Africa	<ul style="list-style-type: none"> <li>● Physical services (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>

## Risks in our supply chains

Iress employs real-time supplier monitoring through Beroe LiVE.Ai™ 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 are asked to accept the Iress Supplier Code of Ethics and Conduct, available [here](#).

Category	Percentage of spend	Industry risk	Country risk
Property Leases & Facilities Management	20.94%	Medium	Low
Software Licensing	19.78%	Low	Medium
Professional Services & Marketing	18.99%	Low	Low
Market Data	15.90%	Low	Low
HR	9.39%	Medium	Low
Royalties & Stock Exchanges	5.72%	Low	Medium
Hardware & Peripherals	4.28%	Medium	Medium
Travel & Expense Management	2.12%	Low	Low
Networks & Hosting	1.83%	Low	Low
Fixed Line & Data	0.42%	Low	Low
Subscriptions	0.35%	Low	Low
Credit Card	0.17%	Low	Low
IT Services	0.11%	Medium	Low

Industry and country risk is assessed through Beroe LiVE.Ai™ using international standards, data feeds and indexes. Industry risk is assessed using four themes; environment, labour & human rights, ethics and sustainable procurement. Property leases and facilities management is classified as a medium risk industry due to low wages for roles such as security, cleaning and housekeeping. For these suppliers, where a new supplier is set up, or a wage rate is changed, we request proof from the supplier to ensure that the correct wage is being passed onto the employees.

Country risk is assessed using four themes; environment, health & social, human rights and governance. Scores are

assigned to each theme out of 10 (10 being least risky) with scores over 6.0 to be low risk and countries with scores below 4.5 to be high risk. Royalties and stock exchanges are classified as a medium country risk due to the fact that stock exchanges exist in many countries including locations where the environmental, health & safety and human rights conditions are considered higher risk. Data is sourced from these exchanges and used by clients (within Iress trading software/platforms) in countries around the world. Due diligence on the stock exchanges themselves suggests low risk of modern slavery within, however they do operate in locations where the overall ESG risk is higher.

## Real-time monitoring data details

Association	Assessment	Details
<b>Achilles</b>	Labour self-assessment	<ul style="list-style-type: none"> <li>Supplier participation required upon request</li> </ul>
<b>D&amp;B or Credit Safe or Creditor Watch</b>	Financial risk check	<ul style="list-style-type: none"> <li>D&amp;B SER rating</li> <li>Credit safe overall rating</li> <li>Creditor watch overall financial risk rating</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>Prowave</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 Beroe LiVE.Ai™ are raised by the Head of Procurement at the quarterly Modern Slavery Working group meeting. The nature of flags varies, from being flagging/quoting the supplier as the source of information, 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 working group meeting, and if appropriate, action is taken. To date, there have been no flags reported that have warranted further action. The lack of flags may be indicative of an insufficient process and we intend to strengthen these processes in 2023.

The Supplier Code of Ethics and Conduct was reviewed and updated in November 2022 defining rules of engagement with suppliers. When engaging with 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 prospective suppliers believe or suspect that their 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 Legal Officer (member of the Modern Slavery Working Group) and not proceed further with that entity.

- Suppliers complete an extensive section on Human Rights including modern slavery. This information is processed and checked by the Head of Procurement and any flags are raised in a timely manner.

Iress has analysed where it may cause, contribute to, or be directly linked to, modern slavery risks based on a review taking known risk factors into account, including risks related to:

- sector and industry
- products and services
- geographic
- individual entities in our supply chain.

The outcome of the review is set out in the table on the next page.

## High-risk areas

The following are known risks in the industry sectors applicable or relevant to Iress' operations

Industries	Modern slavery risk/indicators of modern slavery
<p>Electronic hardware including computers, laptops, and phones. Consumer electronic devices have been named one of the highest risk imports for modern slavery by the Global Slavery Index.</p>	<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> <li>● High-risk geographies</li> <li>● Conflict materials</li> </ul>
<p>Office equipment</p>	<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> <li>● High-risk geographies</li> <li>● Conflict materials</li> </ul>
<p>Merchandise and promotional material</p>	<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> <li>● High-risk geographies</li> </ul>
<p>Recruitment strategies by suppliers</p>	<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> <li>● High-risk geographies</li> </ul>

# Key actions in 2022

## Planning & prioritisation

Held an internal human rights workshop facilitated by an external consultant. Attendees across ESG, legal, procurement, compliance and risk management teams were represented as well as Leadership and Board representatives - including the Chair of the Board Audit & Risk Committee. This specialised workshop helped build awareness and clarity of what to prioritise each year when reviewing the most prominent risks in our supply chain and operations. The workshop also helped Iress recognise its weaknesses as a business and the biggest challenges that need to be addressed with immediate action.

From this workshop, we identified these top priorities:

- 1. Training:** To implement mandatory training for our people involved in decision-making in our operation and supply chains using Safetrac training resources.
- 2. Further due diligence:** To carry out a risk scan to segment suppliers into high risk categories and develop an appropriate approach.
- 3. Stronger communication:** To ensure our contractors in high-risk modern slavery areas are aware of our grievance mechanism and are communicating with their employees regarding the support Iress provides.
- 4. Site visits:** To develop a process of conducting frequent site audit visits for our high-risk suppliers.
- 5. Review existing Iress contracts with suppliers:** To review all contracts with our suppliers ensuring they meet Iress' [Supplier Code of Ethics](#).
- 6. Remediation process:** To clearly define a process of remediation created by our People Team if modern slavery is identified. Our approach will be tailored for each modern slavery case due to each case depending on several factors such as: Iress' degree of linkage, the geography and the governmental regulations in that area of concern.

## Enhanced onboarding

Implemented a new supplier onboarding process that captures information and initiates due diligence across Procurement, Information Security, Accounts teams and engages the Legal team for contracts review. This process captures all of the information required for evaluation by these teams, upfront. That information triggers the creation of Jira tickets for engaging the various teams for their component of the due diligence. The information captured during the course of the various due diligence processes is stored as an artefact within the Jira tickets and a copy of the Google form is also kept centrally.

## Real-time monitoring

Conducted 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™.

## Sustainable procurement

Developed a list of recommended suppliers for our Sydney and Melbourne offices to increase our support of social enterprise and Indigenous-owned business.



# Grievance & remediation



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Iress continues to provide 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 Whistleblower hotline or email inbox: [humanrights@iress.com](mailto:humanrights@iress.com)
- Assessment by Modern Slavery Working Group
- Escalation to Chief Legal Officer
- Remediation (including consulting third parties and escalating to law enforcement)
- Ongoing review managed by the Modern Slavery Working Group

No modern slavery grievances were raised in the reporting period.

# Measuring effectiveness

We work in partnership with suppliers in identifying and mitigating risks in their operations and supplier base to address the risk of modern slavery.

Key area	Description	In 2022
Governance & policy	As part of our risk culture of continuous improvement, we regularly review, test, and monitor our modern slavery processes and procedures to ensure they remain appropriate and are performing effectively.	Held a human rights workshop with key stakeholders to identify gaps, review current approaches and prioritise actions listed in the Modern Slavery Roadmap.
Procurement & supply chain	Supplier segmentation provides the ability to apply targeted focus to areas of heightened supply chain risk, additionally, realtime KYS 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.	<p>Implemented a new supplier onboarding process that captures information and engages due diligence across Procurement, Information Security, Accounts teams and engages the Legal team for contracts review.</p> <p>Gathered data via real-time monitoring of all non-government suppliers, including financial stability, adverse media (environmental, labour, health &amp; safety, ethical &amp; regulatory media), sanctions, and company sustainability credentials via Beroe LiVE.Ai™.</p>
HR practices	Annual review of contractors employed through external agencies to ensure wages are above the minimum wage.	Reviewed employee payslips employed through an external contractor.
Stakeholder consultation	Annual employee ESG survey measures improvement and feedback on initiatives. Materiality process with internal and external stakeholders seeks to identify and address appropriate issues.	Gathered annual findings and presented this at our Modern Slavery Working Group monthly meetings, this helped to map our 2023 priorities.

Key area	Description	In 2022
Training program	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.
Whistleblower hotline	Our confidential and anonymous whistleblower hotline is reviewed for issues raised in relation to modern slavery.	No reports of modern slavery or modern slavery indicators received through this mechanism.

# Ongoing commitment



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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 or supply chain.

Iress completed its fifth edition of ESG reporting (2022) 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

## Our Modern Slavery Roadmap

This year, Iress took further action in developing a 2023-2025 Modern Slavery Roadmap to improve our approach towards addressing the complexities of modern slavery. The main focuses will be:

Key Initiative	Action
Program Governance	Launch the three-year action plan that outlines our key initiatives to improve the identification and response to modern slavery in our operations. Importantly, this plan will enhance our ability to continually monitor and measure our progress.
Training Program	Develop and roll-out a targeted modern slavery awareness training (both online and face-to-face) that supports our people with identifying and acting on associated modern slavery risk indicators.
Grievance and Remediation	Establish an enterprise-wide Modern Slavery Response Policy that clearly and effectively addresses instances of modern slavery.
Supply Chain Assurance	Engage with direct suppliers to identify the potential risk posed by their operations, including on-site assessments of high-risk suppliers.
	Develop a programme on how we move beyond contractual compliance to risk mitigation.
Policy	Review global policies in alignment with international human rights standards.

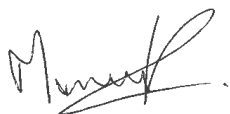
# Approval

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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 22 June 2023.

This statement is signed by Marcus Price in his role as the Managing Director & CEO of Iress Limited on 22 June 2023.

Signed:



**Marcus Price**

Managing Director & CEO of Iress Limited

22 June 2023.

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

Reporting criteria	Pages
Section 16 (a) Identify the reporting entity.	2
Section 16 (b) describe the structure, operations and supply chains of the reporting entity.	3-6
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.	10-12, 15
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.	3, 7, 9, 13-14, 16-17
Section 16 (e) describe how the reporting entity assesses the effectiveness of such actions.	18-19
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.	2-3
Section 16 (g) include any other information that the reporting entity, or the entity giving the statement, considers relevant.	8, 20-21

## Appendix A

Australia	
BC Gateways Pty Ltd	No More Practice Education Pty Ltd
Diversa Funds Management Pty Ltd	No More Practice Holdings Pty Ltd
Diversa Pty Ltd (formerly Diversa Ltd)	OneVue Financial Pty Ltd
FUND.eXchange Pty Ltd	OneVue Fund Services Pty Ltd
Financial Synergy Actuarial Pty Ltd	OneVue Holdings Ltd
Financial Synergy Holdings Pty Ltd	OneVue Pty Ltd
Financial Synergy Pty Ltd	OneVue Services Pty Ltd
Glykoz Pty Ltd	OneVue Super Member Administration Pty Ltd
Group Insurance & Superannuation Concepts Pty Ltd	OneVue Super Services Holdings Pty Ltd
Innergi Pty Ltd	OneVue Super Services Pty Ltd
Investment Gateway Pty Ltd	OneVue UMA Pty Ltd
Iress Data Pty Ltd	OneVue Unit Registry Pty Ltd
Iress Euro Holdings Pty Ltd	OneVue Wealth Services Ltd
Iress Information Pty Ltd	OneVue Wealth Solutions Pty Ltd
Iress International Holding Pty Ltd	Planning Resources Group Pty Ltd
Iress South Africa (Australia) Pty Ltd	Top Quartile Management Pty Ltd
Iress Spotlight Wealth Management Solutions (RSA) Pty Ltd	Tranzact Consulting Pty Ltd
Iress Wealth Management Pty Ltd	Tranzact Financial Services Pty Ltd
Lucsan Capital Pty Ltd	Tranzact Superannuation Services Pty Ltd
Map Funds Management Pty Ltd	



<b>Canada</b>	
Iress Canada Holdings Ltd	Iress (Ontario) Ltd
Iress (LP) Holdings Corp.	KTG Technologies Corp.
Iress Market Technology Canada LP	
<b>South Africa</b>	
Advicenet Advisory Services (Pty) Ltd	Iress MD RSA (Pty) Ltd
Iress Hosting (Pty) Ltd	Iress Wealth MNGT (Pty) Ltd
Iress Financial Markets (Pty) Ltd	
<b>United Kingdom</b>	
Iress FS Group Ltd	Iress (UK) Ltd
Iress FS Ltd	Iress UK Holdings Ltd
Iress Mortgage Services Ltd	Iress Web Ltd
O&M Systems Ltd	Proquote Ltd
O&M Life & Pensions Ltd	Pulse Software Systems Ltd
Iress Portal Ltd	Pulse Software Management Ltd
Iress Solutions Ltd	QuantHouse UK Ltd
Iress Technology Ltd	TrigoldCrystal Ltd
<b>Other countries</b>	
BC Gateways Ltd (Hong Kong)	Iress SAS
Iress Asia Holdings Ltd (Hong Kong)	Iress Tunisia Branch Sàrl
Iress Inc	QH HoldCo (Luxembourg)
Iress Malaysia Holdings Sdn Bhd (Malaysia)	QuantHouse Singapore Pte Ltd (Singapore)
Iress Market Technology (Singapore) Pte Ltd (Singapore)	Waysun Technology Development Ltd (Hong Kong)
Iress (NZ) Ltd (New Zealand)	



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