

MODERN SLAVERY STATEMENT

Modern Slavery Act 2018 (Commonwealth of Australia)

Trend Micro Australia Pty Ltd

ABN 70 077 055 817

Financial Year Ending 31 December 2025

1. Introduction

This statement is made by Trend Micro Australia Pty Ltd (ABN 70 077 055 817) (**Trend Micro Australia**) trading as TrendAI and TrendLife, pursuant to the Modern Slavery Act 2018 (Cth) (**Act**). It covers the financial year ending 31 December 2025.

Modern slavery is a violation of fundamental human rights and involves the serious exploitation of a person under duress of slavery, servitude, human trafficking, forced labour, debt bondage and the worst forms of child labour. Trend Micro Australia maintains a zero-tolerance approach to any form of modern slavery in its operations and supply chains.

Trend Micro Australia does not own or control any other entities. Accordingly, this statement covers only the operations and supply chains of Trend Micro Australia itself.

2. Structure, Operations and Supply Chains

Structure

Trend Micro Australia is a wholly owned subsidiary in a group of companies and does not own or control any other entities. The ultimate parent of Trend Micro Australia is Trend Micro Incorporated, a listed Japanese corporation and a global leader in cybersecurity solutions, with over 6700 employees operating in over 65 countries worldwide.

As a subsidiary, Trend Micro Australia operates within the corporate governance and compliance frameworks established by the broader Trend Micro group, while independently ensuring compliance with Australian law, including the Act.

Operations

Trend Micro Australia supplies cybersecurity products and services including hybrid cloud, endpoint and network security solutions, and automated solutions for secure data sharing. Further information about the company's offerings is available at www.trendmicro.com.au.

The software and solutions offered by Trend Micro Australia are developed by the global Trend Micro group, with contributions from Trend Micro Australia personnel. Trend Micro Australia's workforce is engaged under Australian employment law and operates from office premises in Australia.

Supply Chains

Trend Micro Australia collaborates with channel partners to fulfil product and service distribution and delivery. It relies on multiple third-party suppliers and outsourcing arrangements for the supply of goods and services, including IT infrastructure, product sales, professional services, marketing and events.

The majority of Trend Micro Australia's supply chain involves the procurement of software and software-related services. Engagement with suppliers spans a range of geographies, reflecting the global nature of technology supply chains.

3. Modern Slavery Risks

Trend Micro Australia has undertaken assessments of modern slavery risks in its operations and supply chains during the reporting period to identify whether it may be directly or indirectly linked to modern slavery practices.

The following risk factors are considered in our assessment:

- *Geographic risk*: the countries from which goods and services are sourced, including any jurisdictions with elevated risk of forced or child labour.
- *Product and service risk*: the nature of the products and services procured, including whether procurement involves labour-intensive industries or complex multi-tier supply chains.
- *Sector risk*: the extent to which the sectors in which Trend Micro Australia operates are associated with modern slavery exposure.
- *Supply chain model risk*: the complexity of intermediary arrangements and the degree of visibility Trend Micro Australia has into its supply chains.

Based on this assessment, Trend Micro Australia considers its risk of involvement in modern slavery to be low. This assessment reflects the primarily software-based nature of its business, the professional and white-collar character of its direct workforce, and its sourcing arrangements with established, regulated suppliers.

Trend Micro Australia recognises that no organisation can guarantee a modern slavery-free supply chain. The full extent of risks throughout all tiers of the supply chain continues to be investigated and will be assessed on an ongoing basis.

During the reporting period, no incidents of modern slavery were identified in Trend Micro Australia's operations or supply chains.

4. Actions Taken to Assess and Address Risks

Due Diligence

Trend Micro Australia together with other Trend Micro group companies, has implemented a supplier due diligence process as part of its supplier selection and on-boarding procedure. This

includes evaluating potential suppliers for modern slavery risk indicators prior to engagement, establishing relationships based on trust and integrity and entering into binding contracts that include specific modern slavery provisions that require compliance with the Act and to support Trend Micro Australia's compliance initiatives.

Trend Micro Australia expects its suppliers to hold their own subcontractors and supply chain participants to equivalent standards.

Customers and suppliers in Australia fulfilling their modern slavery obligations routinely request Trend Micro Australia to confirm, in tenders and binding contracts, that it complies with modern slavery obligations. These requests prompt internal examination and a reassessment of our own compliance initiatives.

Policies

During the reporting period, Trend Micro Australia has examined and, where necessary, revised and updated its internal policies relevant to modern slavery compliance, including:

- Code of Conduct — Trend Micro Australia is subject to a Code of Conduct that applies to Trend Micro personnel internationally. This Code specifically identifies modern slavery as a crime and a violation of fundamental human rights. All employees of Trend Micro Australia are required to review and sign the Code of Conduct upon commencement of employment and renew that commitment annually.
- Whistleblower Policy — Trend Micro Australia promotes open communication and has established a written procedure to encourage personnel to come forward with any concerns about its operations, including concerns relating to modern slavery. These procedures are set out in the Trend Micro Australia Whistleblower Policy, supported by a Whistleblowing Report Procedure.

Trend Micro Australia meticulously complies with all applicable Australian laws, including those relating to employment and the engagement of third-party contractors and has adopted additional policies to support these compliance obligations.

Remediation

Trend Micro Australia will respond to any identified cases of modern slavery or suspected modern slavery risk within its operations or supply chains, including:

- Immediate escalation to senior management upon receipt of any allegation or credible report of modern slavery;
- Confidential disclosures of modern slavery concerns made in accordance with the Whistleblower Policy;
- Cooperation with relevant law enforcement agencies and regulatory authorities as required;
- Engagement with affected workers and suppliers to understand the circumstances and determine appropriate corrective action;
- Remediation measures, which may include supporting affected workers to access appropriate assistance, suspending or terminating supplier relationships where necessary and implementing enhanced monitoring requirements; and
- Post-incident review to identify systemic gaps and strengthen preventive controls.

No instances of modern slavery were identified during the reporting period. Trend Micro Australia will continue to review and strengthen its remediation framework in line with better practice guidance issued by the Attorney-General's Department and the Australian Government Interdepartmental Committee on Human Trafficking and Slavery.

5. Assessing the Effectiveness of Our Actions

Trend Micro Australia, together with the assistance of other members of the Trend Group, monitors the effectiveness of its actions to identify and manage modern slavery risks through the following measures:

- Internal policy review: conducting annual reviews of internal policies, including the Code of Conduct and Whistleblower Policy, to ensure they remain current and effective.
- Incident reporting: monitoring whistleblower and other grievance channels for any reports relating to modern slavery.
- Tender and contract compliance: reviewing customer questionnaires and tender responses to identify any gaps in Trend Micro Australia's compliance posture.
- Board and management reporting: providing reports to the Board of Directors and senior management on modern slavery compliance activities and outcomes.

Based on these measures, Trend Micro Australia did not identify any incidents of modern slavery during the reporting period and considers its actions to be effective. We will continue to refine these measures and adapt our approach based on the results of ongoing monitoring, changes in guidance from the Attorney-General's Department, and evolving better practice.

6. Consultation with Owned or Controlled Entities

Trend Micro Australia does not own or control any other entities. Accordingly, there are no owned or controlled entities with which consultation is required under section 16(1)(f) of the Act. This statement has been prepared solely on behalf of Trend Micro Australia Pty Ltd.

7. Other Relevant Information

Board Awareness and Governance

The Board of Directors of Trend Micro Australia and senior management are aware of Trend Micro Australia's obligations under the Act. The Board has approved this statement in accordance with section 13(2)(c) of the Act.

Next steps

Trend Micro Australia will continue to strengthen its modern slavery compliance program. Planned actions for the next reporting period include:

- Expanding the proportion of suppliers required to acknowledge compliance with the Act;

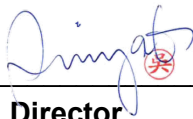
- Reviewing and enhancing due diligence processes in response to updated guidance from the Attorney-General's Department, including proposed stronger due diligence requirements currently under consideration;
- Continuing to monitor developments in modern slavery law and policy at the Commonwealth and State levels, including proposed amendments arising from the December 2024 Commonwealth Government response to the statutory review of the Act; and
- Maintaining engagement with customers, partners and other stakeholders on modern slavery risk and compliance.

Trend Micro Australia is committed to acting with integrity and transparency in all business dealings and to continuously improving its response to modern slavery risks.

8. Approval and Signature

This statement was approved by the Board of Directors of Trend Micro Australia Pty Ltd in accordance with section 13(2)(c) of the Modern Slavery Act 2018 (Cth).

Signed for and on behalf of Trend Micro Australia Pty Ltd:



Shirley Ng, Director

Date: 26th June 2026