

COMPUTERSHARE
LIMITED
ENVIRONMENTAL,
SOCIAL AND
GOVERNANCE
POLICY



CERTAINTY | INGENUITY | ADVANTAGE

Computershare

Environmental, Social and Governance (ESG) Policy

March 2023

1. BACKGROUND

Computershare aspires to effect positive change related to key ESG matters.

We are committed to a transparent, accountable approach to business that recognises the legitimate interests of all stakeholders by:

- > Supporting the creation of a more sustainable and equitable future with shared value for our employees, clients, suppliers, shareholders, community and the environment.
- > Focusing on identifying ESG opportunities and mitigating ESG risks as part of our core strategic priorities and day-to-day operations, in line with our company values.
- > Aligning with recognised global ESG disclosure frameworks and standards, currently including the United Nations Sustainable Development Goals (SDGs), CDP (formerly the Climate Disclosure Project), Task Force on Climate-Related Financial Disclosures (TCFD), Sustainability Accounting Standards Board (SASB) and the Science Based Targets initiative (SBTi).

2. PURPOSE

The purpose of this policy is to set out how Computershare manages ESG risks by conducting our business in a way that enables us to continue being successful and profitable, while balancing our needs with those of our employees, clients, suppliers, shareholders, communities and environment.

We understand that our future success depends upon addressing ESG issues including climate change, Diversity & Inclusion, protecting our reputation, attracting, retaining and engaging employees, evolving our revenue streams and operating efficiently. Key to our success will be embedding ESG principles within the organisation as part of our existing 'Being Purple' company values, our strategic priorities and individual objectives.

Environmental, Social and Governance (ESG) Policy

March 2023

3. WHO THIS POLICY APPLIES TO

The Policy applies to all employees of Computershare and its subsidiaries (including the Board of Directors) in all countries in which we operate.

Computershare expects all employees to comply with this Policy by ensuring they act at all times in accordance with the requirements set out below.

4. OUR ESG STRATEGY

Our ESG strategy is designed to foster stronger relationships with both our internal and external stakeholders, reduce risks to our business, protect and enhance our reputation and drive efficiencies through better management of resources. We are committed to transparent communication with our stakeholders in relation to ESG and will continue to report annually on material ESG topics and issues.

Computershare is committed to conducting its business in accordance with the [UN Global Compact and SDGs](#), which we believe supports long-term, sustainable business performance and helps build a more sustainable world.

We aim to do this by working on the following areas:

Environmental, Social and Governance (ESG) Policy

March 2023

SUSTAINABLE DEVELOPMENT GOALS



ENVIRONMENT

Minimising the impact of our resource consumption on the environment, by reducing our carbon footprint and other environmental impacts.

Sustainability is a core focus across Computershare, and we are working actively towards managing and reducing the long-term impact of our business. Our biggest environmental impacts come from purchased goods and services, paper and logistics, and business travel/employee commuting.

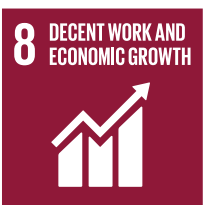
We commit to:

- > Seeking continuous improvement in reducing our environmental impacts and use of resources throughout our business.
- > Calculating our Scope 1, 2 and 3 emissions annually and reducing/offsetting these emissions to attain carbon neutrality.
- > Developing and implementing an ongoing Net Zero plan to meet our 2042 target date, in line with validated science-based targets.
- > Taking material steps to eliminate, reduce and/or mitigate major environmental risks associated with our business.
- > Assessing opportunities to improve sustainability across Computershare's global offices.
- > Continuing to develop work practices and use new technologies to reduce the impact and waste of resources and energy used both internally and to provide services to our clients and their customers.
- > Continuing to identify opportunities to develop more sustainable products and services that will help address environmental impacts, improve resource efficiency and minimise greenhouse gas emissions.

Environmental, Social and Governance (ESG) Policy

March 2023

SUSTAINABLE DEVELOPMENT GOALS



SOCIAL

How we interact with customers, communities, employees and suppliers

Our people are at the heart of everything we do and we believe that Computershare's success depends on instilling our culture of 'doing the right thing', attracting high-performing people who are aligned to our values and enabling them to reach their potential. Our [Diversity & Inclusion Policy](#) and [Code of Conduct](#) reinforce the critical role that our employees have in maintaining our reputation for honest, ethical and legally responsible conduct. We are also dedicated to initiatives that support our local and global communities in reducing inequalities and poverty.

We commit to:

- > Ensuring products and services are safe and marketed ethically and that customer data is secure.
- > Enforcing our global Code of Conduct, which sets out our overarching expectations for the appropriate conduct of all employees.
- > Preventing human rights abuses, such as modern slavery, within our business and supply chains, through our Human Rights Policy, Supplier Code of Conduct and Modern Slavery program and reporting.
- > Developing and appropriately rewarding our people.
- > Listening to our people and reviewing engagement, wellbeing, and culture through our Annual Employee Opinion Survey.
- > Nurturing a diverse workforce and inclusive business environment, including delivering on our multi-year Diversity & Inclusion strategy and maintaining policies and processes to support equality in the workplace.
- > Maintaining our Change A Life global charitable giving program and matching the contributions we encourage our employees to make.

Environmental, Social and Governance (ESG) Policy

March 2023

- > Remaining committed to community engagement through volunteer and fundraising programs based in areas local to our businesses and giving each employee a volunteer day in addition to their annual leave entitlement.

SUSTAINABLE DEVELOPMENT GOALS



GOVERNANCE

Internal practices and policies for effective and ethical decision making and legal compliance

Computershare aims to ensure that management of ESG topics is embedded across the organisation so we can develop the right company culture around ESG. We embed ESG management and reporting into our governance structures and communications to employees to ensure that ESG is understood by all our people, including the Board and the Executive Leadership Team.

Computershare's Board of Directors reviews and approves the group's main ESG objectives and periodically monitors progress against them. ESG is a standing item on the Board's agenda. We also ensure that short-term variable incentive schemes for our senior management team include ESG-related targets. Collectively these steps highlight the importance of ESG to Computershare and help ensure that our employees feel motivated to support the delivery of our ESG program.

We have adopted an ESG Governance structure designed to ensure that the management and control of ESG risks is supported by a strong culture of governance and doing the right thing across the organisation.

Environmental, Social and Governance (ESG) Policy

March 2023

We commit to:

- > Reporting regularly, accurately and consistently to internal and external stakeholders on our ESG performance against internal KPIs and objectives and external global disclosure standards and frameworks, in addition to our usual reporting on financial results, business strategy and operations.
- > Reporting quarterly to our Board on our ESG progress, ensuring executive remuneration remains linked to ESG-related objectives and making our business leaders and managers accountable for ESG risks and performance management.
- > Reviewing and updating our ESG-related policies annually and communicating them effectively to all internal and external stakeholders.
- > Protecting our information assets and customer data through our information security strategy, information security operating model and strong internal capability.
- > Aligning our external reporting to best practice ESG and climate-related disclosure frameworks and standards.
- > Maintaining our cross-regional steering committees (Net Zero, Risk, Modern Slavery and Diversity & Inclusion) to support ESG governance across the organisation.
- > Continuing with our structured approach to assessing and mitigating ESG-related risks against a global framework that considers the financial, reputational, regulatory, customer/client, people and environmental impacts.

Environmental, Social and Governance (ESG) Policy

March 2023

5. GROUP LEVEL POLICIES AND CODES THAT SUPPORT ESG

The following groupwide [governance policies](#) are available on our corporate website.

- > [Global Code of Conduct](#)
- > [Securities Dealing Policy](#)
- > [Continuous Disclosure Policy](#)
- > [Diversity and Inclusion Policy](#)
- > [Human Rights Policy](#)
- > [Anti-Bribery and Corruption Policy](#)
- > [Whistleblower Policy](#)

These policies and codes are communicated to all employees through our Global Employee Handbook, mandatory training and other internal channels, and are reviewed and maintained on an ongoing basis.

Further information on the Group’s ESG performance is provided in our latest [ESG Report and Annual Report](#).

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Policy Sponsor



Stuart Irving
Chief Executive Officer
Computershare Group

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Policy Owner



Lucy Newcombe
Chief People and ESG Officer
Computershare Group

