

COMPUTERSHARE  
LIMITED  
SUPPLIER CODE OF  
CONDUCT



CERTAINTY

INGENUITY

ADVANTAGE

 **Computershare**

# Supplier Code of Conduct

## OTHER RELEVANT POLICIES

[Anti-Bribery and Anti-Corruption Policy](#)

[Human Rights Policy](#)

[Modern Slavery Statement](#)

[Whistleblower Policy](#)

## 1. INTRODUCTION

Computershare is committed to conducting business in an economically responsible, and socially and environmentally sustainable way.

Computershare is a signatory to the United Nations Global Compact, and is committed to reflecting those principles within our business and supply chains. Computershare endeavours to ensure that any parties who supply goods and/or services to Computershare ("Suppliers") support us in meeting these principles.

This supplier code of conduct ("Supplier Code") describes the standards of integrity and ethics, human rights, labour, social, and environmental practices that Computershare expects our Suppliers to adhere to.

The standards outlined in this Supplier Code may be updated from time to time, for example, to reflect changes in laws, regulations and standards.

### 1.1 To whom does the Supplier Code apply?

This Supplier Code applies to all of Computershare's Suppliers in relation to their provision of goods and/or services to Computershare.

Computershare expects that our Suppliers have in place their own policies and standards, which are aligned with the expectations set out in this Supplier Code, and that they apply similar expectations and standards in their own supply chain. The standards set out in this Supplier Code are not intended to supersede any more stringent obligations that a supplier may have to Computershare (e.g., as specified within any contract with Computershare).

Computershare may also request, from time to time, information regarding a Supplier's labour, health, safety and environmental practices, as well as its business activities, financial situation and operational performance. Suppliers must respond to any such request within the requested timeframe.

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## **1.2 Reporting misconduct**

Suppliers are required to report to Computershare all suspected or known violations of this Supplier Code by the Supplier. Suspected or known violations can be reported by speaking with your day-to-day contact at Computershare.

Alternatively, if you prefer, you may report suspected or known violations of this Supplier Code confidentially and anonymously through the Computershare Ethics Line.

## **1.3 No retaliation**

Computershare does not tolerate any retaliation against anyone who reports conduct that they know, or have reasonable grounds to suspect, or believe in good faith is in violation of this Supplier Code, or who otherwise provides assistance in connection with such a report.

## **1.4 Audit and transparency**

Computershare reserves the right to monitor and audit each Supplier's compliance with our Supplier Code. Suppliers are expected to cooperate by providing all relevant information requested and reasonable access for site visits, and by making individuals accessible to Computershare for audit purposes.

Any violations of this Supplier Code identified or reported must be remediated by a Supplier effectively and in an agreed timeframe.

Where violations of this Supplier Code are identified/reported, Computershare will endeavour to support the Suppliers on any improvements required to remediate the issue(s).

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## 2. SUPPLIER CODE OF CONDUCT

### 2.1 Conflicts of interest

#### What is this?

Computershare actively manages any conflicts of interest to ensure that those interests do not override our professional responsibilities and judgement; and we require our Suppliers to operate in the same manner.

#### What does this mean for our Suppliers?

- › Suppliers must identify and disclose to Computershare any actual, potential or perceived conflict of interest that may relate to their business dealings with Computershare.
- › Where a conflict may arise, Suppliers must not allow that interest to affect their ability to make objective decisions in relation to their business dealings with Computershare.

### 2.2 Anti-corruption and anti-bribery

#### What is this?

Computershare is committed to doing business with the highest levels of integrity. We expect our Suppliers to operate with the same level of integrity.

#### What does this mean for our Suppliers?

- › Suppliers must conduct their business dealings with integrity and must not engage in nor tolerate any form of bribery, corruption or fraud.
- › Suppliers must never request, accept, pay, offer or authorise bribes, either directly or indirectly, under any circumstances including in connection with all their dealings with Computershare.

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- › Suppliers must not offer or make a facilitation payment in connection with their business dealings with Computershare, and nor must they instruct, authorise or permit others to offer or make such payments on their behalf.
- › Suppliers must take reasonable steps to ensure that no assets or payments provided to Computershare are from known or suspected proceeds of criminal activity.
- › Suppliers must review [Computershare's Anti-Bribery and Anti-Corruption Policy](#).
- › Suppliers will comply with all relevant trade sanctions and ensure there is no engagement with sanctioned entities or persons within their supply chain.

## 2.3 Privacy and confidentiality

### What is this?

Computershare is committed to ensuring that all confidential and personal information is protected, and takes reasonable measures to ensure confidential information is not disclosed to any unauthorised party.

### What does this mean for our suppliers?

- › Suppliers must ensure that they comply with all of their obligations in relation to the protection, collection and handling of confidential and personal information of Computershare and/or its employees, clients and other stakeholders, and such information is protected through all reasonable security measures.
- › If a Supplier becomes aware of any unauthorised use, receipt or disclosure of confidential information relating to Computershare and/or its employees, clients or stakeholders, the Supplier must report the incident to Computershare immediately.

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## 2.4 Labour and human rights

### What is this?

Labour and human rights are critical to how Computershare treats and supports those that contribute to the success of our business. Computershare wants to work with Suppliers that support our values and meet both our standards and all applicable laws in the area of labour and human rights.

### What does this mean for our suppliers?

- › Suppliers must ensure that working hours do not exceed the maximum working hours set by applicable labour laws, and are compliant with all other laws including those on human rights.
- › Suppliers must ensure that all of their employees earn fair wages and benefits and that they comply with all relevant labour laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.
- › Suppliers must commit to a workplace free of harassment, inhumane treatment, and unlawful discrimination.
- › Suppliers must not tolerate slavery, forced labour, child labour, or human trafficking in any form in their own operations and those of their supply chain.
- › Suppliers must recognise the special needs of employees under the age of 18 and fulfil their duty of care towards them.
- › Suppliers must not allow any practice that would restrict the free movement of workers.
- › Suppliers must recognise and respect employees' rights to freedom of association.

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## 2.5 Occupational health, safety and wellbeing

### What is this?

Occupational health, safety and wellbeing are key to how Computershare works.

### What does this mean for our suppliers?

Suppliers must provide safe and healthy working environments for their employees, subcontractors and visitors (e.g., clean and suitable welfare facilities, properly maintained equipment, and suitable lighting/ventilation). Additionally, suppliers must ensure that all risks from workplace activities and operations are identified, risk-assessed, and adequately controlled. Suppliers must also ensure that procedures and systems are in place to track and report occupational injuries and illnesses as part of an effective occupational health and safety management system.

## 2.6 Environment and climate action

### What is this?

Computershare is committed to protecting the environment, and we believe we can make a significant contribution to a more sustainable planet. Computershare actively works to improve the environmental performance of our operations, products and services across their entire life cycles through our environmental management system, and aligned with ISO 14001:2015. Furthermore, Computershare is committed to achieving Net Zero by 2042.

### What does this mean for our suppliers?

Suppliers must conduct business activities and operations in a sustainable and environmentally responsible manner, through an effective environmental management system. As a minimum, Suppliers must:

- › Ensure compliance with all applicable legal and regulatory environmental requirements (including any specific environmental permit or product environmental requirements), and the environmental management standards set out in this Supplier Code;

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- › Ensure the use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is conserved by appropriate practices;
- › Ensure emissions and discharges of pollutants and generation of waste (hazardous and non-hazardous) are eliminated at source or minimised through appropriate practices;
- › Understand how their businesses may impact biodiversity and, as relevant, act to safeguard biodiversity;
- › Ensure that chemicals, waste and other materials posing a hazard to humans, or the environment, are appropriately identified, labelled and managed, to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal;
- › Identify methods to improve energy efficiency and minimise energy consumption and greenhouse gas emissions.

Additionally, in support of Computershare's commitment to achieving Net Zero by 2042, Suppliers will be requested to provide specific greenhouse gas data, which as a minimum will include energy consumption data and all relevant Scope 1 and Scope 2 greenhouse gas emissions data in its entirety. This information must be documented and made available to Computershare (on request). To support this request, Suppliers are encouraged to implement appropriate systems to collect, track and measure this data, and should also consider establishing their own greenhouse gas reduction target for their entire organisation (e.g., Net Zero).

Computershare will also work with Suppliers, if required, to support the collection of their Scope 3 greenhouse gas emissions data, specifically in relation to providing information on how to calculate 1) upstream emissions from fleet, heating, cooling and electricity; 2) business travel; and 3) employee commuting, and ensure all of these categories are included within their reduction target.

**Note:** Computershare can provide guidance to Suppliers on how to measure and target reductions across Scope 1, 2 and 3 emission categories.



