

MODERN SLAVERY STATEMENT 2024

CERTAINTY | INGENUITY | ADVANTAGE

 **computershare**

CONTENTS

Message from the CEO 2

About our Statement 3

Our organisation and supply chain 4

Our approach to risk management 8

Understanding and assessing the modern slavery risks in our operations and supply chain 9

Addressing our modern slavery risks 13

Assessing the effectiveness of our actions 15

Looking forward 16

Appendix A..... 17

Appendix B..... 18

MESSAGE FROM THE CEO



Computershare is committed to doing the right thing and supporting our employees, clients, and communities, which is the foundation of our environment, social and governance (ESG) approach. We believe our business has an important role to play in upholding and protecting human rights and our Global Human Rights Policy and ESG Policy reflect our commitment to act with integrity in all business dealings and relationships.

We consider our 'Being Purple' ways of working as a solid ethical platform for our group processes and procedures. All our employees, from new starters to senior managers, are trained on and regularly communicated with about these policies and our expectations of them.

Computershare is classified as a professional services business and whilst we have assessed our overall risk exposure to modern slavery as low, we are determined to ensure that our operations and supply chain do not contain any incidents of modern slavery and to also be transparent in how we manage our risks. We have controls in place to identify and manage areas of potential risk, and continue to develop and invest, especially in regard to the contracting and business partnership of suppliers and third parties, as you will see later in this statement.

This, our fifth Modern Slavery Statement, outlines the effective mitigation and management systems we have in place to address the specific risks of modern slavery in our operations and supply chain.

During FY24, we took a range of important actions to enhance our approach:

Continued embedding our Supplier Code of Conduct

Computershare expects our suppliers to do business in an ethical manner and share the same commitments as we do in supporting human rights, including the elimination of modern slavery in their own organisation and supply chain.

In June 2023, we released our [Supplier Code of Conduct](#), which describes the standards of integrity and ethics, human rights, labour, social, and environmental practices that we expect our suppliers to adhere to. All new suppliers are asked to comply with the Supplier Code of Conduct as part of their onboarding, and from 1 July 2023 to 30 June 2024 we onboarded over 350 new suppliers who confirmed their commitment to comply with our code.

Updated our Remediation Policy and relevant standards

Computershare is committed to ensuring that, if it is found we have caused, contributed to, or been related in any way to instances of modern slavery, a remediation plan is followed to correct this. In FY24, Computershare reviewed and updated our Modern Slavery Remediation Policy and also implemented a global Modern Slavery Standard. The Modern Slavery

Standard complements the Computershare Human Rights and Modern Slavery Remediation policies and sets out the standards we follow to manage the risk that slavery or human trafficking may occur in our operations or those involved in our supply chain.

Provided modern slavery training for our people

We monitor, report and manage mandatory training completion rates as part of our training governance framework. In FY24, over 99% of eligible staff completed our mandatory e-learning modules on human rights, anti-bribery and corruption measures, and anti-money laundering.

Some roles in our business require additional understanding of modern slavery risks. In FY24, members of the Procurement, Facilities, Recruitment and the wider People teams, as well as those involved in purchasing IT products and our modern slavery working group, again took part in enhanced modern anti-slavery training through Unseen, a specialist training provider. Over 50 staff completed the modules, including 20 procurement staff who completed additional training.

Being ethical and honest in our business practices remains a top priority and we've identified the following focus areas in FY25:

Ongoing improvement of supplier management

Now that our Supplier Code of Conduct has been released, our focus is on further embedding this Code within our procurement processes. We are asking existing suppliers (at the point of periodic review and/or contract renewal) to comply with our Code, or confirm that they have their own code which meets our minimum standards. To date, over 660 of our suppliers have done this and this will remain an area of focus in FY25.

Enhance our risk reporting metrics

In FY25 we will enhance our risk reporting metrics to include modern slavery indicators relating to our business. These metrics will form part of our standard risk metric reporting and governance processes, including oversight from Senior Management.

We remain committed to ensuring that modern slavery has no part in the services we directly provide or in the supply chains we rely on to provide those services, and to being transparent in how we manage modern slavery risks.

Stuart Irving,
Chief Executive Officer

ABOUT OUR STATEMENT

This Modern Slavery Statement has been prepared by Computershare Limited on behalf of itself and its controlled entities. It complies with the requirements of the Australian Modern Slavery Act 2018, the UK Modern Slavery Act 2015 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 and applies to the reporting year ended on 30 June 2024. It has been approved by the Board of Computershare Limited on 18 December 2024, by each Australian Reporting Entity¹ on 13 December 2024, each UK Reporting Entity² on 17 December 2024 and each Canadian Reporting Entity³ on 17 and 18 December 2024. The board of each Australian Reporting Entity, UK Reporting Entity and Canadian Reporting Entity was consulted with and given an opportunity to consider and comment on the Statement prior to publication.

The Statement was prepared in consultation with Computershare's controlled entities by establishing a globally coordinated cross-functional working group comprised of senior management and personnel in areas such as Procurement, People, Legal, Risk and Compliance, ESG and Corporate Communications.

This Statement is made in accordance with:

- (i) Section s14 of the Australian Modern Slavery Act 2018 (Cth) and also represents the Australian Reporting Entities' Statement on modern slavery for the financial year ended 30 June 2024;
- (ii) Section 54 UK Modern Slavery Act 2015 and also represents the UK Reporting Entities' Statement on modern slavery for the period ended 30 June 2024; and
- (iii) Part (2) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the period ended 30 June, and provides a report to the Minister on the steps the Canadian Reporting Entities have taken during the twelve month period prior to the Annual Report deadline of May 31st of every year, to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the Canadian Reporting Entities or of goods imported into Canada by the Canadian Reporting Entities.

A complete list of the controlled entities to which this Statement relates is set out in Computershare's FY24 Annual Report.

1 This statement applies to the following Computershare Group reporting entities for the purposes of the Act and has been approved by the Boards of each of these entities: Computershare Investor Services Pty Limited, Computershare Communication Services Pty Limited, Registrars Holdings Pty Limited, CDS International Pty Limited, ACN 080 903 957 Pty Ltd and ACN 081 035 752 Pty Ltd

2 Computershare Investor Services plc, Computershare Technology Services (UK) Limited, Homeloan Management Limited, Computershare Services Limited and Topaz Finance Limited

3 This statement applies only to Computershare Canada, which shall apply to Computershare Trust Company of Canada ("CTCC") and Computershare Investor Services Inc. ("CISI" and together with CTCC, the "Canadian Reporting Entities") and shall govern the business of all such Canadian Reporting Entities.

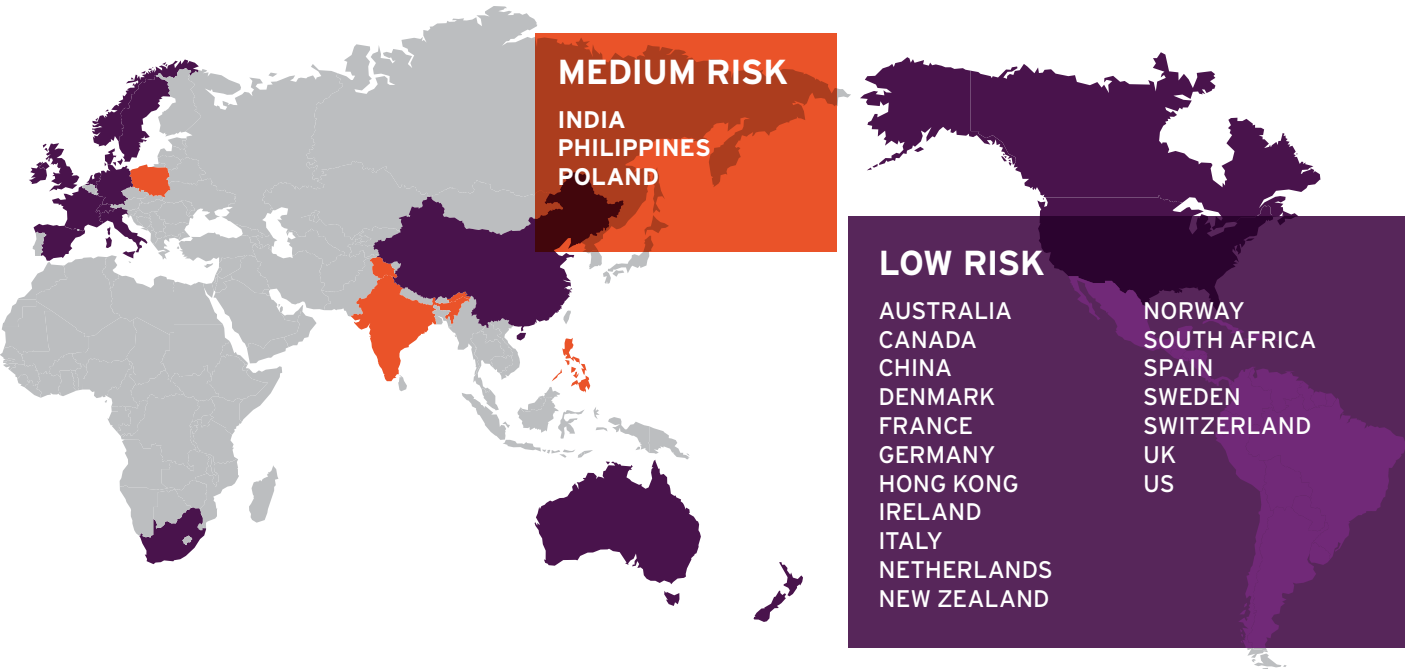
OUR ORGANISATION AND SUPPLY CHAIN

Founded in 1978, the Computershare group is a global market leader in transfer agency and share registration, employee equity plans, proxy solicitation and stakeholder communications. We also specialise in corporate trust, mortgage servicing and a range of other diversified financial and governance services.

Computershare is renowned for our expertise in high integrity data management, high volume transaction processing and reconciliations, payments and stakeholder engagement. Many of the world’s leading organisations use us to streamline and maximise the value of relationships with their investors, employees and customers.

Computershare is represented in all major financial markets and has over 12,000 employees worldwide in over 20 countries. Computershare is also listed on the Australian Securities Exchange under the Industrials Sector and Industry Group: Commercial and Professional Services.

COMPUTERSHARE LOCATIONS AND KEY STATS



Source: Global Slavery Risk Index Report 2023
Channel Islands, where Computershare also has an office, is not listed in the Global Slavery Risk Index Report.

Issuer Services	Employee Share Plans	Corporate Trust	Mortgage Services	Communication Services
PRESENCE IN 22 COUNTRIES	25,000+ CLIENTS	A\$15BN MARKET CAPITALISATION	12,202 FULL-TIME AND PART-TIME EMPLOYEES	
51% FEMALE	49% MALE	2,508 TEMPORARY EMPLOYEES	218 FIXED-TERM CONTRACT EMPLOYEES	

WHERE WE PROVIDE SERVICES BY BUSINESS LINE - OVERVIEW

For internal reporting and risk management purposes, Computershare's operating businesses are structured across the following areas:

	Australia	Canada	Channel Islands	China	Denmark	France	Germany	Hong Kong	Ireland	India	Italy	Netherlands	Norway	New Zealand	Philippines	Poland	South Africa	Spain	Sweden	Switzerland	UK	USA
Issuer Services 1,815 employees	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓	✓		✓	✓	✓	✓	✓	✓
Communication Services 823 employees	✓	✓		✓	✓		✓	✓	✓					✓							✓	✓
Employee Share Plans 1,187 employees	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓
Mortgage Services and Property Rental Services 1,109 employees									✓												✓	
Computershare Corporate Trust 2,645 employees		✓								✓												✓

ISSUER SERVICES

Register maintenance, corporate actions, stakeholder relationship management, corporate governance and related services

COMMUNICATION SERVICES

Document composition and printing, intelligent mailing, inbound process automation, scanning and electronic delivery, and utilities administration

EMPLOYEE SHARE PLANS

Provision of administration and related services for employee share and option plans, together with childcare voucher administration in the UK

MORTGAGE SERVICES AND PROPERTY RENTAL SERVICES

Mortgage servicing and related activities, together with tenancy bond protection services

COMPUTERSHARE CORPORATE TRUST

Trust and agency services in connection with the administration of debt securities in the US and Canada

Stats at 30 June 2024. Employee stats include Full Time Equivalent (direct employees only) and excluding Technology/Operations (3,464 employees) and Shared Services (1,338 employees).

In May 2024 Computershare sold its US Mortgage Services business.

These operating businesses are supported by corporate and shared service functions, including Technology Services, Finance, Risk and Compliance, People, Internal Audit and Legal. Our business is office-based but with flexibility for hybrid and remote working where appropriate. We also have some print/mail and document custody facilities supporting our Communication Services and Corporate Trust businesses respectively.

We have a diverse supply chain where goods and services are sourced by our procurement teams across seven main categories: Print, mail and postage, Insurance and employee benefits, Technology, Financial market and professional services, Managed and offshore services, Facilities related services and Talent acquisition services.

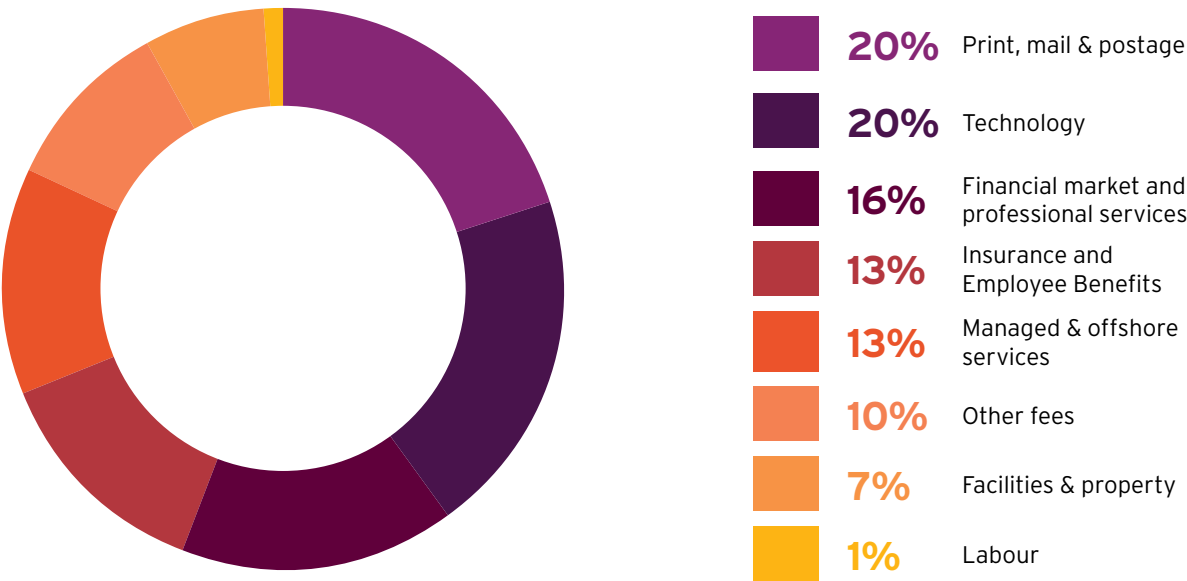
The image below outlines the types of products and services procured for each category across our Top 300 suppliers (85% of global spend) and the countries from which they are purchased.

PROCUREMENT CATEGORIES	EXAMPLES OF GOODS AND SERVICES PROCURED	KEY PURCHASING COUNTRIES
Print, mail and postage	Paper, envelopes, couriers and postal services	Australia, Canada, China/Hong Kong, Germany, Ireland, Jersey, New Zealand, South Africa, Switzerland, United States, United Kingdom
Insurance and Employee Benefits	Healthcare, social insurance, insurance	Australia, Canada, China/Hong Kong, Jersey, Ireland, New Zealand, Norway, South Africa, Switzerland, United Kingdom, United States
Technology	Software, telecommunications, IT support services, technology hardware	Australia, Canada, China/Hong Kong, Ireland, New Zealand, South Africa, Switzerland, United Kingdom, United States
Financial market and professional services	Consultancy and other professional services, clearing services, exchange and brokerage fees	Australia, China/Hong Kong, Jersey, Switzerland, United Kingdom, United States
Managed and offshore services	Back office operational support services, technology development, cloud services	Australia, Canada, China/Hong Kong, Switzerland, United Kingdom, United States
Facilities and property	Rent, office fitouts, office equipment, stationery, furniture and onsite services such as cleaning, catering and property maintenance	Australia, Canada, China/Hong Kong, Ireland, South Africa, Switzerland, United Kingdom, United States
Talent acquisition services	Recruitment agencies	Australia, Canada, Ireland, Switzerland, United Kingdom, United States

In FY24 we transacted with 3,172 different suppliers. 85% of our supplier spend is with our top 300 suppliers and 54% of this spend is in the US. Our highest expenses are print, mail and postal services, and technology. The graph below contains the details of our Top 300 supplier spend by procurement category.

SUPPLIER SPEND BY PROCUREMENT CATEGORY

GLOBAL



OUR APPROACH TO RISK MANAGEMENT

Computershare views effective management of risk as key to achieving our strategic and operational objectives and fundamental to protecting our reputation and shareholder value. Computershare is committed to ensuring that risk management is a core capability and an integral part of the organisation's activities and has therefore developed an Enterprise Risk Management Framework (ERMF).

The ERMF sets out the structure and suite of risks relevant to all Computershare businesses. These include Supplier and Counterparty Risk which is defined as the risk that Suppliers or Counterparties fail to deliver on contractual, promised and expected services. Risk appetite statements are approved by the board of directors of the group parent entity, Computershare Limited, and these statements set the amount of risk the business is prepared to tolerate for each risk area. They are reviewed regularly to ensure they remain relevant and help manage the total amount of risk we are willing to take in pursuit of our business objectives within acceptable board-determined thresholds. Computershare has a low appetite for Supplier and Counterparty Risk.

The ERMF supports the achievement of Computershare's objectives by bringing a systematic, consistent and pragmatic approach to identifying, analysing, mitigating and reporting risk and control within acceptable tolerances. The ERMF is forward looking and is designed to lead to proactive decision making and ultimately help improve Computershare's performance. The ERMF exists to provide a high-level outline of Computershare's approach to risk management that can be applied to the different business environments globally and across all types of risk by outlining:

- › the risk management principles associated with the identification, assessment and treatment of risk;
- › common language, definitions and tools to support the management of risk; and
- › the governance structure, including roles and responsibilities, for the management and monitoring of risk.

A review of the Risk Management Policy and ERMF is coordinated by the Global Risk Group (GRG) on an annual basis. It involves key stakeholders across the business and technology units of Computershare and is approved by the board of Computershare Limited.

Computershare operates a strict three lines of defence model for risk management. This is supported by clear definitions of roles and responsibilities towards risk management. Staff are trained and communicated with on a regular basis in reference to the model and their specific responsibilities.

In order to develop an understanding of the risk, Computershare considers both the consequences of the risk (impact) and the likelihood (probability) that these consequences will occur.

UNDERSTANDING AND ASSESSING THE MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

In understanding and assessing the risk of modern slavery in our operations and supply chain, Computershare has had regard to the United Nations Guiding Principles as a baseline:

- > A company may cause a human rights impact if its own actions or omissions directly result in that impact;
- > A company may contribute to a human rights impact if its actions or omissions contribute to another party causing the impact (for example, by incentivising it); and
- > A company may be directly linked to a human rights impact by another entity it has a business relationship with through its operations, products or services.

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Specific practices that constitute modern slavery can include:

- > Human trafficking
- > Slavery
- > Servitude
- > Forced labour
- > Debt bondage
- > Forced marriage, and
- > Child exploitation

We assess our risks from a variety of perspectives in relation to modern slavery and third party risk in particular. This includes looking at industry sectors (and the services provided) and geographical locations, as two specific areas where the potential risk of modern slavery is higher for our organisation. Computershare has identified the following areas in our corporate operations and supply chain where modern slavery risks may arise:



Our Modern Slavery Working Party met regularly in FY24 to review our business and supply chain activities and to coordinate the implementation of changes needed to comply with our modern slavery commitments across the Group. This working group includes senior management and personnel in areas such as Procurement, People, Legal, Risk and Compliance, ESG and Corporate Communications. The working group is responsible for identifying areas for improvement and implementing appropriate practices to manage and mitigate modern slavery risks across our operations and supply chains.

The following areas were identified for monitoring and review of modern slavery risks.

OUR RISKS AS A FINANCIAL SERVICES PROVIDER

As a provider of a diverse range of financial, governance and other related services, Computershare believes modern slavery risk in our organisation and supply chain is low. As with many financial services companies, there are areas of heightened focus, for example, some locations we operate within are considered higher-risk jurisdictions.

Many of our services are regulated activities and we take our regulatory responsibilities seriously. We have a global compliance program that is designed to ensure that we treat our customers fairly, monitor and prevent the misuse of our products and services for the purpose of money laundering and terrorist financing, and ensure our staff and suppliers monitor and prevent bribery and corruption in all of our business dealings.

Of the locations we operate within, a number are identified as medium risk locations as per the Global Slavery Index 2023 (as referenced on p. 4). For Computershare, these are India, Poland and the Philippines.

We have established a consistent global due-diligence and on-boarding process for our suppliers. These processes will continue to be reviewed and enhanced in FY25 as we invest and extend our technology capabilities for monitoring and tracking our suppliers.

Identified higher risk jurisdictions

In FY23, we provided an update on the establishment of our operations in India, and in this statement we have included information on our Polish operation.

Computershare acquired an operating centre in Warsaw, Poland as part of our acquisition of the Equatex Group in 2018. The Warsaw hub was established by Equatex in 2017 as an operating Centre of Excellence to support its Share Plans business and has since become an integral part of the Computershare EMEA Employee Share Plans organisation.

Establishing the Warsaw Office

Poland is a well-established location for many global companies. Over 1,100 overseas corporates have operational presences in Poland, and employ almost 450,000 specialists and experts across various functions such as Finance, IT, HR, Operations and Customer Support. Global corporations from the Banking and Financial Services industry have well established operations in Poland, and this creates access to a strong pool of talent with qualifications relevant to the profile of our business.

Fair treatment and workspace conditions

Warsaw has a skilled and educated workforce with a large number of universities and business centres that have a similar profile to Computershare, is easily connected by air from most of the major cities in Europe, and has generally good living conditions. The office location for the Warsaw hub was carefully selected in the city centre for ease of access for employees via public transport, which is well developed in Warsaw.

Additionally, the office premises are of a premium office standard with a good workspace for employees. In line with the Computershare Group policy, we offer employees a hybrid work model.

In the Financial Services and Business Centre industry locally, the employee-employer relationship is set to a high employment standard. In addition to regular social security and health care contributions, Computershare staff have additional benefits such as medical care and reimbursement of external training and certifications. The local management team monitors the general practices and trends of other business centres to ensure that our work conditions and offerings to employees not only meet legal requirements but also remain attractive in the market.

Equal opportunity

Our Polish employees also have access to both EMEA and global Computershare programs. They have been recognised in numerous employee awards for being outstanding performers. Additionally, staff have joined global initiatives and moved into roles in the wider business. We have been focusing on developing our talent pool in Poland, and are happy with the progress we've made so far.

Quality vendors and third party service providers

Whenever possible, our Polish operations work with global tier 1 vendors well known for their high quality of service and ethical standards. Where local services are used, there is a focus on firms that operate sustainably and take appropriate care of their staff.

Computershare Group support

Computershare senior leadership, managers, and experts from other locations regularly visit the Warsaw hub. The hub's size has expanded gradually over time and is now an important operational centre for Employee Share Plans in EMEA.

OUR RISKS AS AN EMPLOYER

Within our direct workforce

Computershare considers the residual risk of modern slavery within our direct workforce to be very low given that we have direct oversight and control of this aspect of our organisation and have strong governance and oversight of our hiring practices and working conditions. All employees globally are of at least the minimum working age in accordance with local legislation, have freedom to leave their roles if they choose to do so and no wages are withheld.

The majority of our workforce is qualified or skilled in financial services or supporting functions and the nature of the work performed is mainly office or home-based. Alongside this, Computershare is committed to strictly complying with all applicable labour laws and we maintain a zero-tolerance approach to modern slavery within our own operations. We also have a strong policy environment to support this (detailed in Appendix A).

To help manage our risks as an employer and as part of our continuous investment in employee capabilities, we ensure our mandatory training covers the information that our employees need to know to carry out their roles effectively, and we monitor our completion rates as part of our training governance framework.

In FY24, 99% of eligible staff completed our mandatory e-learning modules on human rights, anti-bribery and corruption measures, and anti-money laundering. All staff are also required to attest to the Computershare Group Code of Conduct each year.

Some roles in our business require additional understanding of modern slavery risks. In FY24, members of the Procurement, Facilities, Recruitment and wider People teams, as well as those involved in purchasing IT products and our modern slavery working group, again took part in enhanced modern anti-slavery training through Unseen, a specialist training provider in the UK. Over 50 staff completed the modules, including 20 procurement staff who completed additional training.

The topics covered in this training were:

1. Modern Slavery and Human Trafficking - Know the types and scale of modern slavery and human trafficking globally.
2. Spot the Signs and Take Action - Be able to spot the signs of exploitation in the workplace and feel confident in taking safe and appropriate action.
3. The Role of Business - Understand the role that businesses play in modern slavery and how companies can tackle exploitation.
4. Continuous Improvement - Recognise the difference between compliance and continuous improvement in preventing modern slavery.

All individuals were asked to use the learning when carrying out their day to day responsibilities.

FY24 completion rates:

- > Modern Slavery in Business: 98% (51 out of 52 completions, with the remaining individual having completed the course in FY25.)
- > Modern Slavery in Procurement: 100% (20 out of 20 completions)

We have health and safety measures in place globally, and expect all employees to:

- > Comply with and be protected by all relevant safety rules and practices
- > Follow instructions concerning safe and efficient work practices
- > Advise their manager or People team representative if they become aware of an unsafe or careless work practice or activity

As part of our Being Purple ways of working, our commitment to “do the right thing” is supported by our broader Diversity, Equity and Inclusion (DEI) initiatives. These programs help promote our human rights commitments by keeping inclusion principles front of mind.

To help drive our DEI strategy we have established groups and committees, including a global DEI forum, DEI working groups and eight employee resource groups. These are employee-led groups that play an important role in embedding inclusion across the company by helping drive and raise awareness of people related policies and strategies. These groups are responsible for making informed DEI principle-based decisions across Computershare's People policies, practices, and procedures that support the DEI values of equity, fairness, equality, inclusivity, respect, integrity and valuing the person.

Within our indirect workforce

Computershare uses labour hire firms, predominantly in the US, for temporary labour. This is typically for project-based work or to meet seasonal workforce needs. These temporary staff are employees of the labour hire firm, who remain responsible for the payment of their wages and other benefits. Modern slavery risk across these labour hire firms is assessed as low at a residual level.

Computershare also utilises a small number of third-party outsource service providers, typically based in locations with lower-cost labour markets. These markets have a higher inherent risk of modern slavery due to the combination of lower wages and less stringent local labour laws and practices. Our processes that monitor and oversee these risks, and help ensure that our partners are good and ethical organisations to work with, are set out later in this Statement.

We do our best to ensure there is consistency and transparency in the process we follow when recruiting for our indirect workforce. We have a screening policy in place that requires the following checks by a third party: pre-employee checks, right to work checks, criminal backgrounds, and government-issued IDs. Computershare has an internal process in place if there are any red flags or concerns raised during the recruitment process, which helps us decide if we approve an individual to work or not. There is also an avenue to raise concerns after indirect employees begin their employment.

RISKS POSED WITHIN OUR SUPPLY CHAIN

When considering our Modern Slavery supply chain risks, we have specifically looked at (i) the geographical locations and (ii) the types of goods and services we procure in each of these geographical regions.

Supply chain risk locations

While we believe that the overall risk profile for modern slavery in our supply chain is low, we are aware that certain geographical locations, by their nature, carry with them an increased risk of modern slavery. The steps we have taken to mitigate these risks are set out later in this Statement.

Our higher risk supply chain goods and services

Facilities and premises suppliers (e.g. cleaning and premises maintenance)

Computershare relies on a number of different companies and services to keep our offices running smoothly and in good working order. These include cleaning staff, caterers, utilities support and building security services.

Suppliers of these types of services have been recognised as potentially using a higher proportion of temporary or foreign workers; and with a heightened risk that these workers are underpaid, work excessive hours or have not received adequate training.

IT hardware

Computershare relies on numerous IT hardware devices, such as servers, mobiles, PCs, laptops and tablet devices. There is a risk that the hardware we procure through our suppliers may have been produced under conditions that breach human rights, such as child labour, forced labour or debt bondage.

Paper suppliers (e.g. suppliers to Computershare Communication Services)

Computershare uses paper to support both our customers and internal business. However, when sourcing paper, we understand that there is a risk that paper and timber products from the global forestry industry carry a risk of human rights violations, including the use of forced, indentured and child labour.

As part of our Net Zero program we are driving global initiatives aimed at digitising our products and reducing paper usage associated with our product/service delivery in the medium to long-term. We are also aiming to improve the certification standards and the way we track all paper products we procure.

Goods not for resale (e.g. promotional goods)

Computershare uses a limited amount of branded promotional items for clients, prospects and our staff. We understand that the manufacturing and procurement of these products (such as items of clothing and low-value manufactured items such as branded pens) may contain heightened modern slavery risks, and we are conscious of this when selecting suppliers.

OUR RISKS AS A SUPPORTER OF THE COMMUNITY

There is a risk that we could support, through donations or advocacy, organisations involved in modern slavery.

Computershare's workplace giving program, Change A Life, was founded in 2005 with the aim of making a real difference to communities around the world. Since then, over AU\$12.9 million has been raised, supporting sustainable agriculture and reforestation, food security, mobile eye care clinics, disaster relief and a range of programs to advance the education and welfare of at-risk children.

As some of the initiatives that Change A Life supports are undertaken in less developed countries, there is a higher risk of modern slavery associated with them. Examples might include the use of contractors to support the building of infrastructure for a vetted charitable institution that is funded by the Change A Life program.

ADDRESSING OUR MODERN SLAVERY RISKS

As a business, we can measure our success in relation to human rights and modern slavery initiatives in the following areas:

AS A FINANCIAL SERVICES PROVIDER

Our compliance program closely monitors our risks related to bribery and corruption and ensures that we remain in compliance with applicable laws and regulations. Computershare publishes our Anti-Bribery and Corruption Policy and Human Rights Policy on the Governance section of our corporate website. Both policies are reviewed by the Board annually as part of the Board policy review cycle.

Our Global Anti-Money Laundering Policy sets global principles and standards for the management of money laundering and terrorist financing risks within Computershare, which helps to reduce any risks of Computershare funding modern slavery and meet our regulatory requirements. We comply with all applicable Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) laws and regulations through:

- Observing Know-Your-Customer (KYC) principles and customer identification regulations – these ensure we identify each client with which we do business to gauge any risks they pose to us (for example, through criminal liabilities). We screen clients when we onboard them and then periodically thereafter (for example, by watching for negative news coverage or sanctions laws brought against them).
- Recognising, investigating, and reporting any suspicious client activity to the relevant criminal authorities in each jurisdiction within which we do business.
- Protecting the reputation and integrity of the organisation, by ensuring we do not do business with or enter contracts with undesirable clients that pose reputational or legal risks to us.

Computershare complies with applicable sanctions laws, and we screen our clients, employees and vendors against the relevant sanctions lists for all the major jurisdictions in which we operate (including United Nations, US OFAC and UK HMT, DFAT and NZ Sanction Lists). This ensures we avoid, for example, doing business with serious organised criminals or sanctioned entities that may involve modern slavery in their operations and undertake significant human rights abuses.

Our regulatory e-learning modules (covering our obligations under our group policies on issues such as human rights, anti-bribery and corruption measures, anti-money laundering, sanction screening, data privacy, workplace health and safety, wellbeing, ESG, anti-discrimination and bullying, accessibility and diversity and inclusion) have been redesigned using an adaptive learning approach. This approach tests the knowledge retention of staff each year, giving us confidence that the learned behaviours we detail in our 'Being Purple' framework are being embedded. These support our policy environment and Global Code of Conduct (see Appendix A).

In addition, our key policies are reviewed annually, as are our training modules, to ensure they remain current and in line with any regulatory changes. We monitor, report and manage mandatory training completion rates as part of our training governance framework. Employees who fail to complete mandatory compliance training without a valid reason may face disciplinary action.

FY24 completion rates of training related to modern slavery:

All three of these training modules touch on different aspects of modern slavery risk and are assigned to all employees to complete in different months of the calendar year. The following training is produced in seven languages.

Computershare and Me, including human rights training: 99.21% completed (= vs. FY23)

Ethical Behaviours and Anti-Bribery and Corruption: 99.12% completed (-0.49% vs. FY23)

Anti-Money Laundering and Terrorist Financing: 99.13% completed (-0.45% vs. FY23)

AS AN EMPLOYER

We operate a rigorous onboarding process that includes the confirmation of appropriate visa status and working entitlements in alignment with legislation in all of the jurisdictions in which we operate. This includes paying at least the national minimum wage, providing at least the legal minimum holiday requirement and monitoring and maintaining the required records for working visas. All staff are expected to complete all relevant regulatory learning (including Human Rights training) within four weeks of joining the company.

Our indirect workforce comprises staff who are the employees of onshore labour hire firms and employees of our offshore outsource service providers, which are mainly back office and IT staff. The labour hire firms are largely based in the US and are subject to rigorous onboarding and diligence processes through our vendor management function. These firms are also subject to robust contractual commitments that require them to follow all applicable labour laws.

Our offshore outsource providers are reputable service providers with whom Computershare has established long term relationships. While regular review meetings with our outsource providers are mostly virtual, senior Computershare representatives also travel to visit these service providers on a periodic basis. These vendors are required contractually to adhere to our policies and standards and many of them have their own stated published position on modern slavery and human rights which is reviewed periodically to ensure alignment with our own policies and standards. We also have contractual audit and inspection rights over their operations and over their supply chain.

Computershare will not tolerate or condone any connection, evidence or suspicion of modern slavery practices in our workplace. Computershare's grievance and whistleblowing policies and procedures are available for any reports of such practices to be reported and thoroughly investigated. We continue to build equitable and inclusive principles into our People policies and practices and decision-making protocols.

In each country in which Computershare operates, the company complies with all required legislated diversity reporting requirements. Computershare is required to report annually on Gender Pay Parity in Australia, South Africa and the UK, and we also voluntarily provide this data every four years in Switzerland. Going forward, we will also report this information in Ireland. Our Australian and UK reports are published externally, and links to these reports can be found on the Governance section of our website.

AS A PURCHASER OF GOODS AND SERVICES

All new suppliers, and existing suppliers at the point of review, are asked to attest that they have their own Human Rights Policy and the equivalent of our Supplier Code of Conduct, which we review, or confirm that they commit to comply with Computershare's.

We actively seek confirmation from any suppliers that have not previously responded to our request.

Our Procurement teams around the globe track suppliers based on spend and risk. Currently this process is managed manually, and we aim to move towards an automated process, supported by technology, where suppliers will be required to confirm they comply with our requirements on an annual basis.

In addition to the top 300 suppliers, we also track other high-risk suppliers across the globe based on the following procurement categories: facilities and premises; IT hardware; paper; and/or goods not for resale.

We are continuing to work with our supplier base to ensure we understand their position and work with them on areas identified for improvement.

AS PART OF THE COMMUNITY

When identifying and selecting appropriate projects for Change A Life to support, Computershare undertakes an extensive due diligence process before we commit to partnering with the charity. This helps us understand the governance processes the charity follows, which other corporate partners are involved, what support it provides and to whom, and checking there has been no adverse media coverage. Computershare visits the location of our major project, regularly meets with our selected charity partners and requires them to provide us with annual reports on the status of our projects.

REMEDIATION

Computershare is committed to ensuring that if it is found we have caused, contributed to, or been related in any way to instances of modern slavery, a remediation plan is followed. To this end, in FY23 we implemented a Remediation Policy following the guidance of "Stronger Together". In FY24, Computershare reviewed and updated our Policy, and implemented a Global Modern Slavery Standard, which complements the Computershare Human Rights Policy and Modern Slavery Remediation Policy. The purpose of this Standard is to set out the standards Computershare follows to manage the risk that slavery or human trafficking may occur in our operations or those involved in our supply chain, as well as the standards Computershare would apply in response to any allegations of modern slavery that may arise.

We had no instances reported during this statement year. Should we in the future, we would expect the infringing party to remediate the issues, and would work with them to do so. Should they be unable to do so to our satisfaction, we would seek to employ an alternative vendor.

Computershare is aware that we can influence our suppliers (the extent of this influence can depend on the size of the supplier and the type and length of our engagement with them), and we want to do the right thing by using that influence to help bring about change for the better in relation to people involved within our operations and supply chain.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Computershare is committed to continually improving our program of work in relation to understanding, reducing and removing the risk of modern slavery within our existing operations and supply chain. We believe that we have made good progress in further understanding and assessing the risks of modern slavery and have reviewed the effectiveness of our actions and tracked our performance in FY24 through the following measures:

GOVERNANCE

Number of Human Rights policy breaches - None

Percentage of staff who have completed regulatory training modules:

- › Ethical Behaviours and Anti-Bribery and Corruption - 99.12% of eligible staff
- › Anti-Money Laundering and Terrorist Financing - 99.13% of eligible staff
- › Human rights training (Computershare and me course) - 99.21% of eligible staff

Computershare continues to develop our policies and suites of standards around modern slavery, ESG, anti-bribery and corruption, and anti-money laundering as well as ensuring that all staff have attested to the Computershare Group Code of Conduct. Reporting required by all reporting entities (with specific requirements to report on modern slavery) is completed under the oversight of the relevant boards of Directors.

MONITORING

The actions undertaken in relation to our supply chain to date have improved the process of identifying, assessing and addressing modern slavery risk; and in FY24 we tracked the following measures:

Supply chain monitoring

Review of Top 300 supplier positions on Human Rights/Modern Slavery

Review of higher risk suppliers' positions on Human Rights/Modern Slavery

Continue to monitor and review sanctions screening hits from vendor onboarding

Number of reports of slavery or trafficking through the Whistleblower program

WHISTLEBLOWER PROGRAM

Our Whistleblower program enables our employees to make reports, including anonymously, should they become aware of, or suspect, reportable conduct. The Whistleblower Program is promoted extensively internally, including in our Code of Conduct.

Matters can be reported through our external [Global Whistleblower Hotline/Website](#), provided by an independent third-party operator, EthicsPoint. This service facilitates anonymous and confidential reporting and is accessible 24 hours a day, seven days a week across all regions in which Computershare operates.

All reports submitted through the service are forwarded to the Computershare Whistleblower function for assessment and, if appropriate, an investigation is undertaken. The Group Risk and Audit and People and Culture Committees have oversight of all Whistleblower reports that are investigated through this process.

There were no modern slavery or trafficking incidents reported through this channel over the reporting period.

RISK MANAGEMENT

Computershare has a global Risk Management team that is responsible for maintaining the Global Risk Framework. This includes global policies, processes and tools to store and manage all of Computershare's risk registers, assessments and resultant action plans in relation to modern slavery. All of these activities provide ongoing insight into the effectiveness of action taken as a result of modern slavery risk assessment.

These processes allow us to monitor changes in our business, such as our geographic footprint, conducting business with higher risk vendors, clients and suppliers and if we have discovered evidence of modern slavery within Computershare or our supply chain. This would trigger a review and upgrading of the risk and the creation of action plans within our risk management process to manage and mitigate any instances.

There were no review triggers in the reporting period that required action.

LOOKING FORWARD

Our modern slavery program will continue to support our ongoing commitment to ESG and effective management of modern slavery risk across our operations and supply chain. We consider the following as priority items to underpin our future endeavours in this important area.

ONGOING IMPROVEMENT OF SUPPLIER MANAGEMENT

Computershare's Supplier Code of Conduct, published in June 2023, describes the principles of integrity and ethics, human rights, labour and social standards, and environmental standards that we require our suppliers to adhere to. Our focus continues to be on embedding this Code of Conduct within our procurement processes and asking existing suppliers to comply with it.

Our procurement team continues to work on implementing a new technology platform to help track our suppliers more efficiently. We are also in the process of reviewing our Top 300 suppliers by spend to assess their ESG position and commitments.

ENHANCE OUR RISK REPORTING METRICS

In FY25 we will enhance our risk reporting metrics to include modern slavery indicators related to our business. These metrics will form part of our standard risk metric reporting and governance processes, including oversight from Senior Management, providing assurance where risk indicators are within tolerance levels and details of actions being taken where they are outside tolerance levels.

Computershare is committed to ensuring that modern slavery has no part in the services we provide or in the supply chains we rely on to provide those services. Computershare wishes to be transparent in the ways in which we are managing modern slavery risk throughout our operations and supply chain. This Statement demonstrates that we are serious about implementing and enforcing effective systems and controls across our business and supply chain in support of these commitments.

We will continue to build on the efforts of FY24, both within our own organisation and in our ongoing working relationships with our suppliers.

APPENDIX A

Our company values of Certainty, Ingenuity and Advantage, supported by our ‘Being Purple’ ways of working, guide our staff in how they should act and conduct business. Alongside this, we have a suite of policies that set clear expectations for every employee.

Global Code of Conduct	The Code of Conduct sets out our overarching expectations for the appropriate conduct of all employees. The core principles of the Code of Conduct form the basis for all of our policies and procedures. The Code of Conduct serves as a guide to assist our people in making the right choice when confronted with an ethical decision.
Global Human Rights Policy	We consider that businesses have an important role to play in respecting human rights - we welcome legislative and other developments that are intended to improve protection for some of the world’s most vulnerable people.
Diversity, Equity & Inclusion Policy	Computershare sees diversity as a source of strength. We work hard to make sure everyone is included within our organisation, removing barriers and obstacles to give everyone an equal opportunity to succeed. We believe in equality and inclusion regardless of age, ethnicity, cultural background, gender identity, marital or family status, religion, disabilities, socio-economic background or sexual orientation. This applies throughout our Group, around the world, with no exceptions.
Whistleblower Policy	This policy supports Computershare’s commitment to the highest standards of ethical conduct and to provide everyone working at Computershare with the means to raise concerns, without fear of retaliation, regarding Reportable Conduct.
Anti-Bribery & Corruption Policy	Computershare takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate. Pivotal to Computershare Group’s success is our culture and our reputation for honesty, ethical and legally responsible conduct.
Global Sanctions Policy	It is essential that Computershare is in compliance with applicable legal and regulatory requirements related to economic and trade sanctions. This policy outlines Computershare’s commitment to remaining in compliance with these requirements and to reduce or eliminate the exposure of Computershare’s businesses, entities and employees to risks from sanctioned countries, entities and individuals.
Environment, Social and Governance Policy	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.
Modern Slavery Remediation Policy	The purpose of this document is to provide steps for Computershare to apply in the event that it becomes aware of an instance of modern slavery within either its own business or that of its suppliers.

APPENDIX B

Section 1: Message from the CEO

Section 2: About our Statement

Section 3: Our organisation and supply chain

Section 4: Our approach to risk management

Section 5: Understanding and assessing the modern slavery risks in our operations and supply chain

Section 6: Addressing our modern slavery risks

Section 7: Assessing the effectiveness of our actions

Section 8: Looking forward

Australian Modern Slavery Act (Mandatory reporting requirements)	Reference in this Statement	UK Modern Slavery Act (Mandatory reporting requirements)	Canada Modern Slavery Act
Identify the reporting entity	Section 2 Section 3	Identification of entity with reporting obligations (s. 54(2))	Identification of entity with reporting obligations (s.c.2023, c.9 part 2 11(1))
Describe the reporting entity's structure, operations and supply chains	Section 2 Section 3	Organisation structure, business and supply chains (s. 54(5)(a))	Organisation structure, activities and supply chains (s.c.2023, c.9 part 2 11(3)(a))
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls	Section 4	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk (s. 54(5)(d))	Parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk ((s.c.2023, c.9 part 2 11(3)(c))
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	Section 5 Appendix A	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff (s. 54(5)(b), (c), (f)) Steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place (i) in any of its supply chains, and (ii) in any part of its own business (s. 54(4))	Organisation's measures it has taken to remediate any forced labour or child labour ((s.c.2023, c.9 part 2 11(3)(d)) Organisation's policies and its due diligence processes in relation to forced labour and child labour ((s.c.2023, c.9 part 2 11(3)(b))
Describe how the reporting entity assesses the effectiveness of such actions	Section 6	Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such indicators as it considers appropriate (s.54(5)(e))	How the Organisation assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains ((s.c.2023, c.9 part 2 11(3)(g))

Australian Modern Slavery Act (Mandatory reporting requirements)	Reference in this Statement	UK Modern Slavery Act (Mandatory reporting requirements)	Canada Modern Slavery Act
Describe the process of consultation with (1) any entities the reporting entity owns or controls, and (2) for a reporting entity covered by a joint statement, the entity covered by a joint statement, the entity giving the Statement.	Section 2	N/A	N/A
Information that the reporting entity, or the entity giving the Statement, considers relevant.	Section 1 Section 7	N/A	N/A
N/A	Section 5 Section 6	N/A	Organisation's training it has provided to employees on forced labour and child labour ((s.c.2023, c.9 part 2 11(3)(f))
N/A	Section 6	N/A	Organisation's measures it has taken to remediate the loss income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains ((s.c.2023, c.9 part 2 11(3)(e))