

# CANADIAN MODERN SLAVERY STATEMENT 2023

CERTAINTY | INGENUITY | ADVANTAGE

 **Computershare**

# OVERVIEW

The Canadian Modern Slavery Statement supplements and affirms the report set out in the Global Modern Slavery Statement (attached hereto as Schedule "B", the "**Global Modern Slavery Statement**") and such Global Modern Slavery Statement is incorporated herein in its entirety by reference.

Attached hereto as Schedule "A" is a Rider containing statements that are applicable 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.

# SCHEDULE "A"

## Rider to the Canadian Modern Slavery Statement

- A. For purposes of the Canadian Modern Slavery Statement, the following language shall be added to a new page of the Canadian Modern Slavery Statement between pages 15 and 16 of the Global Modern Slavery Statement:

### "ABOUT OUR STATEMENT (CANADA)

The Global Modern Slavery Statement has been prepared by Computershare Limited on behalf of itself and its controlled entities and is incorporated into the Canadian Modern Slavery Statement by reference. The Canadian Modern Slavery Statement complies with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023 (Canada) (the "**Act**"), including the annual report deadline of May 31, 2024 (the "**Annual Report Deadline**"). The Global Modern Slavery Statement was approved by the Board of Computershare Limited on 20 December 2023 and the Canadian Modern Slavery Statement was approved by the Boards of the Canadian Reporting Entities<sup>1</sup> on February 21, 2024. The Board of each Canadian Reporting Entity was consulted with and given an opportunity to consider and comment on the Canadian Modern Slavery Statement prior to publication.

The Canadian Modern Slavery Statement was prepared in consultation with senior management and personnel in areas such as Procurement, People, Legal, Risk and Compliance, ESG and Corporate Communications. This Canadian Modern Slavery Statement is made in accordance with part (2) of the Act 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, 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.

<sup>1</sup> This statement applies to the following Computershare Group reporting entities for the purposes of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023 (Canada) and has been approved by the Boards of each of these entities: Computershare Trust Company of Canada ("**CTCC**"), Computershare Investor Services Inc. ("**CISI**") and together with CTCC, the "**Canadian Reporting Entities**")"

- B. For purposes of the Canadian Modern Slavery Statement, Appendix C (attached hereto as Schedule "C") shall be added as the last page of the Canadian Modern Slavery Statement, following the last page of the Global Modern Slavery Statement.

# SCHEDULE "B"

(see attached on the following pages the Global Modern Slavery Statement)

# MODERN SLAVERY STATEMENT 2023

CERTAINTY | INGENUITY | ADVANTAGE

 **Computershare**

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# 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 have identified modern slavery as an existing risk globally.

Our Global Human Rights Policy and ESG Policy reflect our desire to act ethically and with integrity in all business dealings and relationships. We consider our 'Being Purple' ways of working as a solid platform for our group processes and procedures. All our employees, from new starters to senior managers, are trained and regularly communicated with about these policies and our expectations of them.

We are determined to tackle modern slavery and be transparent in how we do so. Computershare is classified as a professional services business and has assessed its overall risk exposure to modern slavery as low. 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 our statement.

This, our fourth Modern Slavery Statement under the Australian reporting regime 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 FY23, we took a range of important actions to enhance our approach:

## Implemented a Supplier Code of Conduct

Computershare expects our suppliers to do business in an ethical manner and to 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.

## Provided modern slavery training for our people

We monitor, report and manage mandatory training completion rates as part of our training governance framework. In FY23, 100% 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 FY23, 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, took part in enhanced modern anti-slavery training through Unseen, a specialist training provider. Over 40 staff completed the modules, including 11 procurement staff who completed additional training.

## Signed up to the UN Global Compact

In 2023 Computershare signed up to the United Nations Global Compact and committed to its Ten Principles, including:

- > Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights
- > Principle 2: Businesses should make sure they are not complicit in human rights abuses
- > Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour
- > Principle 5: Businesses should uphold the effective abolition of child labour

Being ethical and honest in our business practices remains a top priority. While we've made good progress in FY23, we've identified the following areas for improvement for FY24:

## Ongoing improvement of supplier management

Now that our Supplier Code of Conduct has been released, our focus will be on further embedding this policy within our procurement processes and asking existing suppliers at the point of periodic review to comply with it or confirm that their own policy meets our minimum standards.

## Improve our data

We are working to improve our data on suppliers to help support additional disclosure. In FY24 we implemented a new financial management system which will allow us to report on supplier spend more efficiently. Our global Head of Procurement is also closely involved in an ongoing project to update our reporting systems to provide automated tracking of modern slavery attestations.

We remain 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, 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 to comply with the requirements of the Australian Modern Slavery Act 2018 and, where applicable, the UK Modern Slavery Act 2015 and applies to the reporting year ended on 30 June 2023. It has been approved by the Board of Computershare Limited on 20 December 2023, by each Australian Reporting Entity<sup>1</sup> on 14 December 2023 and each UK Reporting Entity<sup>2</sup> on 15 December 2023. The board of each Australian Reporting Entity and UK 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 that comprised 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 2023; and (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 2023. A complete list of the controlled entities to which this Statement relates is set out in Computershare's [FY23 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 and Topaz Finance Limited



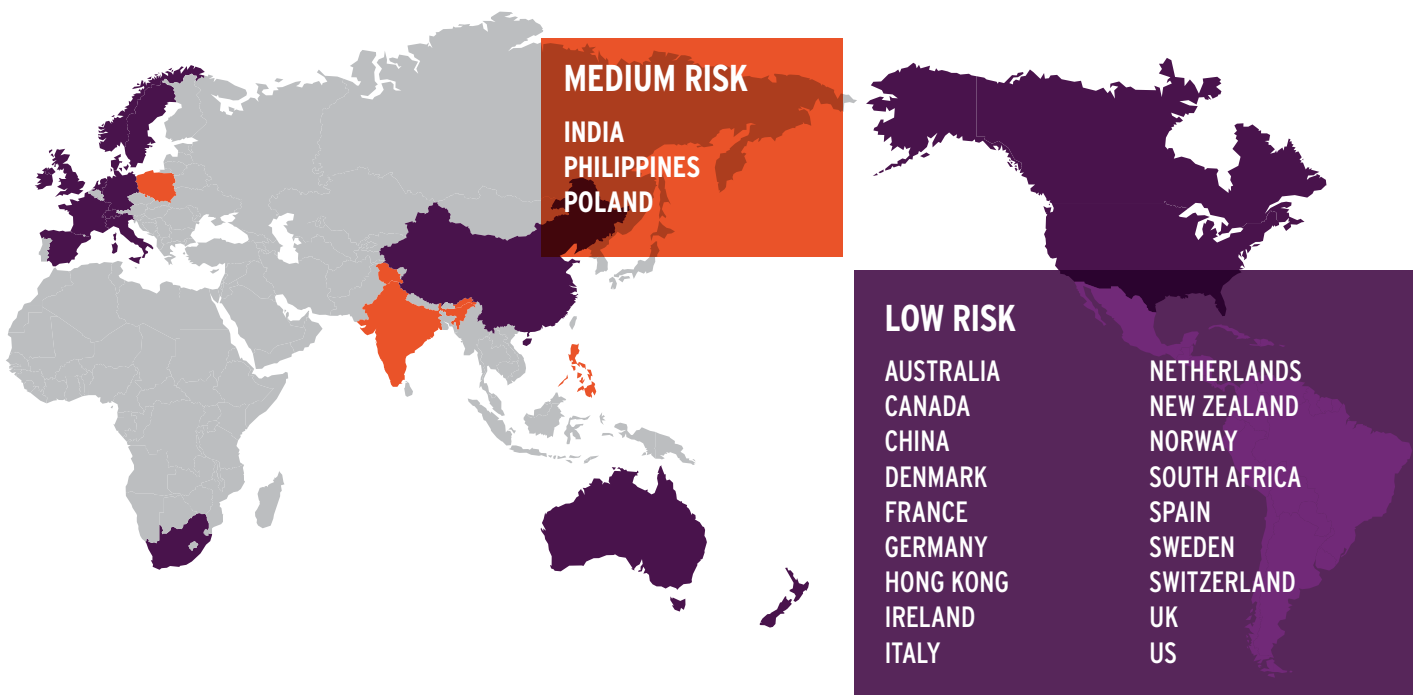
# OUR ORGANISATION AND SUPPLY CHAIN

The Computershare group is a global market leader in transfer agency and share registration, corporate trust, employee equity plans, mortgage servicing, proxy solicitation and stakeholder communications as well as a range of other diversified financial and governance services.

Founded in 1978, Computershare is renowned for its 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.

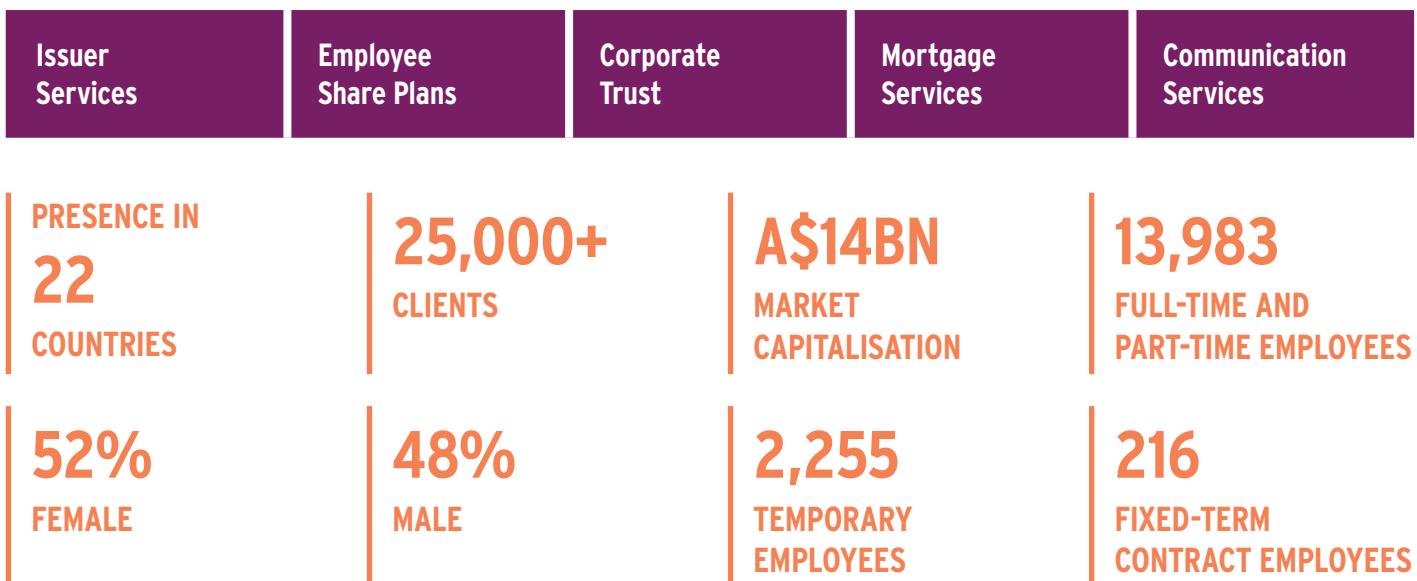
Computershare is represented in all major financial markets and has over 14,000 employees worldwide in over 20 countries. Computershare is also listed on the Australian Securities Exchange under the Industrials Sector and Industry Group: Commercial and Professional Services.

## 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.



Note: Stats at 30 June 2023

## 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	
<b>Issuer Services</b> 3,772 employees	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓
<b>Communication Services</b> 877 employees	✓	✓		✓	✓		✓	✓	✓					✓								✓	✓
<b>Employee Share Plans</b> 1,036 employees	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓
<b>Business Services</b> (includes Corporate Trust in Canada) 129 employees		✓										✓										✓	✓
<b>Mortgage Services and Property Rental Services</b> 2,431 employees									✓													✓	✓
<b>Computershare Corporate Trust</b> 2,877 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

### BUSINESS SERVICES

Services supporting Canadian Corporate Trust administration

### MORTGAGE SERVICES AND PROPERTY RENTAL SERVICES

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

### COMPUTERSHARE CORPORATE TRUST

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

Note: Stats at 30 June 2023, including Full Time Equivalent (direct employees only) and excluding Corporate/Shared Services. In May 2023 Computershare sold its Bankruptcy and Class Actions administration 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 warehouse facilities supporting our Communication Services and Corporate Trust businesses.

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.

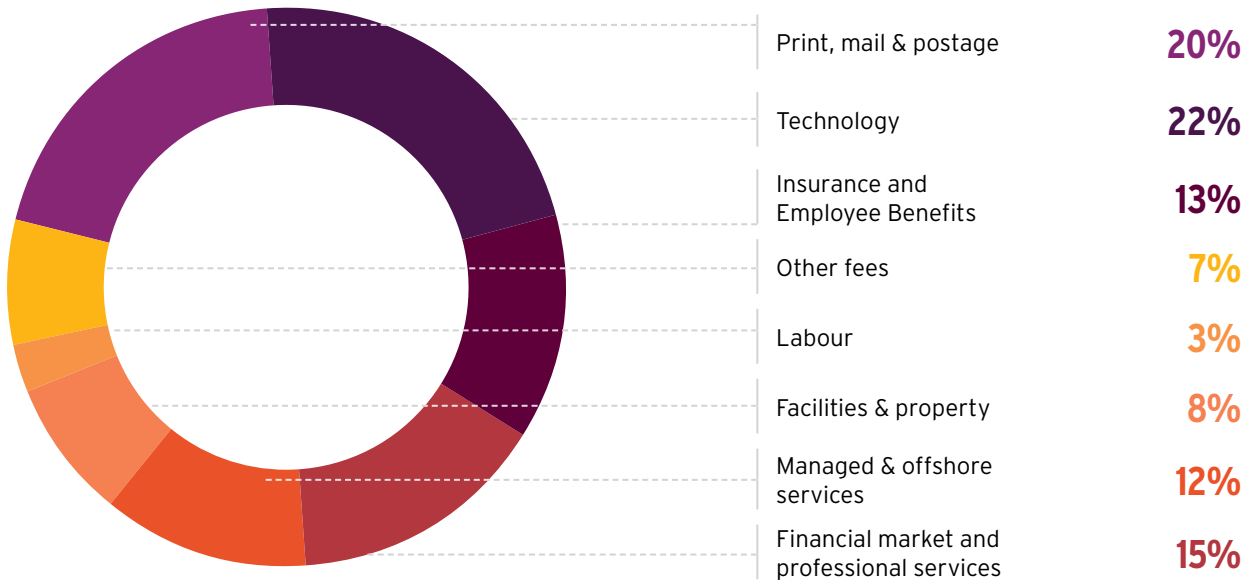
The image below outlines the types of products and services procured for each category across our Top 200 suppliers (83% of global spend) and the countries from which they are purchased.

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

In FY23 we transacted with over 3,700 different suppliers, with 83% of our supplier spend with our top 200 suppliers and 50% of this spend in the US. Our highest expenses are print, mail and postal services and technology. The graph below contains the details of our Top 200 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 its strategic and operational objectives and fundamental to protecting its 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 (ERM) Framework.

The ERM Framework sets out the structure and suite of risks relevant to all Computershare businesses and 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 to 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 ERM Framework 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 ERM Framework is forward looking and is designed to lead to proactive decision making and ultimately help improve Computershare's performance. The ERM Framework 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;
- > a 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 ERM Framework 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)
- > 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

Computershare has identified the following areas in our corporate operations and supply chain where modern slavery risks may arise:



Our Modern Slavery Working Party, established in 2020, meets regularly 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, we monitor and prevent the misuse of our products and services for the purpose of money laundering and terrorist financing, and we 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 continue to evolve our onboarding processes for our suppliers with the aim of having globally consistent processes as far as possible. These processes will be enhanced in FY24 as we extend technology capabilities from the implementation of a new Finance platform and associated procurement functionality to our onboarding of suppliers. Although the process did vary by country in FY23, our onboarding process for suppliers aims to identify non-compliance and evaluates if we should do business with the supplier. If a supplier does not meet our minimum requirements, we will not do business with them. An example was in relation to establishing our new operations in India. In a small number of instances, proposed suppliers did not agree to provide a commitment to support Human Rights in line with our policies, and as a result we did not move forward with them.

### **Establishing our subsidiary in India**

In FY23, Computershare established a wholly-owned subsidiary in India to provide operational support to the US Corporate Trust business that was acquired from Wells Fargo in 2021. From the outset, appropriate oversight and robust governance was at the heart of the project led by a team of senior executives across Computershare.

The project involved setting up a legal entity and establishing two working facilities from scratch in Bengaluru and Hyderabad. As of June 30, 2023, Computershare employed 370 staff, with plans for further expansion. Creating a fantastic employee experience for our new Indian colleagues has been a key focus, including meeting employee transportation needs, facilitating employee engagement and providing support from US-based management. The facilities in India were also visited in person by Computershare global executives after the reporting period.

Equally important has been finding the right partners to help us set up and operate these facilities. Computershare engaged consultants with local knowledge and experience to assist us with a variety of entity set-up and operational onboarding functions, including identifying and interviewing appropriate vendors such as cafeteria, cleaning and transportation services. Computershare also used consultants to evaluate the location of facilities for employee access purposes and assess employee benefit packages against market requirements.

Engagement of suppliers has been undertaken through Computershare's third-party due diligence program. Additionally, Computershare retained local legal counsel to provide legal advice related to contractual requirements for a variety of these services.

To validate our approach, Computershare also conducted a third-party review to assess compliance with certain key regulatory requirements and ensure appropriate local policies and procedures are established and operating as intended and there will be an ongoing program of review and monitoring of the operations.

## **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 we have strong governance and oversight of our hiring practices and working conditions. All employees globally are of minimum working age, 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 as detailed in Appendix A.

### **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 to monitor and oversee these risks and to ensure that our partners are good and ethical organisations to work with are set out later in this Statement.

## **RISKS POSED WITHIN OUR SUPPLY CHAIN**

When considering our supply chain risks, we have looked at (i) the locations and (ii) the types of goods and services we procure.

### **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 goods and services, by their very 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 its customers and its 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 therefore aiming to reduce paper usage associated with our product/service delivery in the medium to long-term.

#### **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 charitable foundation, Change A Life, was founded in 2005 with the aim of making a real difference to the lives of disadvantaged and impoverished communities around the world. Since then, over AU\$12 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 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 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 its Anti-Bribery and Corruption Policy and its Human Rights Policies on the Governance section of our 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' 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.

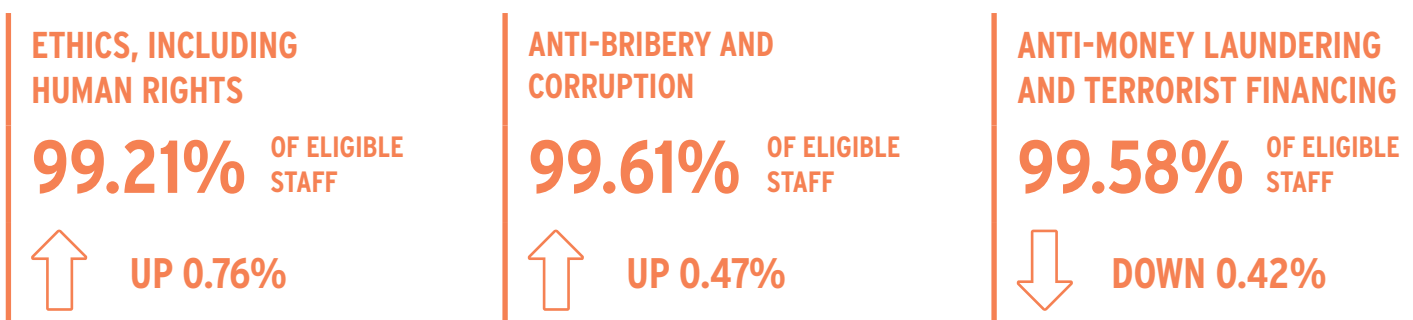
Computershare complies with applicable sanctions laws, and we screen our clients, employees and vendors against the relevant sanctions lists for all the major jurisdictions in which we operate (including United Nations, US OFAC and UK HMT). This ensures we avoid, for example, doing business with serious organised criminals who 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, data privacy, workplace health and safety, wellbeing and environment, 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.

### FY23 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.



## 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 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 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 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. In Australia, Computershare met its reporting requirements under the Federal Government's Workplace Gender Equality Act 2012, including submitting an annual public report on 25 May 2023.

## AS A PURCHASER OF GOODS AND SERVICES

We have continued to monitor both our higher-risk suppliers and those based in higher-risk locations. We actively seek confirmation from any suppliers that have not previously responded to our request asking them to confirm that they comply with their own Human Rights Policy, or alternatively, commit to comply with Computershare's Human Rights Policy.

Over the past 12 months, we have worked in consultation with procurement teams across all jurisdictions to gain further information and evidence from those suppliers who had not previously responded. We have also incorporated requirements to comply with human rights into our processes for onboarding new suppliers.

Procurement teams globally currently track suppliers based on spend and risk. This includes vendors managed by Australia, North America, and the UK. Currently this process is tracked manually, and we aim to move towards an automated process where suppliers will be required to confirm they comply with our requirements on an annual basis.

In addition to the top 200 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.

All new suppliers (including those deemed critical) must attest they comply with either their own Human Rights policy and/or Computershare's as part of their initial onboarding and regular due diligence.

## 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 regularly meets with our selected charity partners and requires them to provide us with annual reports on the status of our projects.

## REMEDATION

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 we have created a Remediation Policy following the guidance of Stronger Together. We are still developing the suite of supporting documents to help our teams and any impacted parties get the best and most appropriate resolution.

We had no instances reported during the statement year. Should we in the future, we would look to engage with the infringing party to see if we can work together to understand and remediate the issues. 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" - 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 its 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 FY23 through the following measures:

## GOVERNANCE

Number of Human Rights policy breaches - None

Percentage of staff who have completed regulatory training modules:

- > Anti-Bribery and Corruption - 99.61% of eligible staff
- > Anti-Money Laundering - 99.58% of eligible staff
- > Human rights training - 99.21% of eligible staff

Computershare continues to develop its policies and suites of standards around modern slavery, ESG, anti-bribery and corruption, and anti-money laundering. 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 FY23 we tracked the following measures.

### Supply chain monitoring

Review of Top 200 supplier positions on Human Rights/Modern Slavery

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

Number of 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. 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 who 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 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 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.

## IMPROVE OUR DATA

Computershare's operations have evolved over recent years to a globally aligned structure, including the creation of a global procurement team. As this function evolves, we will look to improve our data on suppliers, and this will help support improved disclosure. Our global Head of Procurement has responsibility for this and is closely involved in an ongoing project to update our reporting systems to provide automated tracking of modern slavery attestations.

## EMBED OUR SUPPLIER CODE OF CONDUCT

We developed a Supplier Code of Conduct for suppliers that was published June 2023. The Supplier Code of Conduct describes the principles of integrity and ethics, human rights, labour and social standards, and environmental standards that Computershare requires adherence to from its suppliers. Our focus will now be on embedding this policy within our procurement processes and asking existing suppliers to comply with it. All new suppliers are asked to comply with the Supplier Code of Conduct as part of their onboarding.

**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 FY23, 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.

<b>Global Code of Conduct</b>	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.
<b>Global Human Rights Policy</b>	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.
<b>Diversity, Equity &amp; Inclusion Policy</b>	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.
<b>Whistleblower Policy</b>	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.
<b>Anti-Bribery &amp; Corruption Policy</b>	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.
<b>Anti-Money Laundering &amp; Terrorist Financing Policy</b>	It is essential that Computershare complies with all applicable legal and regulatory requirements related to Anti-Money Laundering and Anti-Terrorist Financing (both "AML"). This policy outlines Computershare's commitment to remaining in compliance with these requirements and reducing or eliminating the exposure of Computershare's businesses, entities and employees to AML risks.
<b>Environment, Social and Governance Policy</b>	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.

## APPENDIX B

<b>Australian Modern Slavery Act (Mandatory reporting requirements)</b>	<b>Reference in this Statement</b>	<b>UK Modern Slavery Act (Mandatory reporting requirements)</b>
Identify the reporting entity	Section 2 Section 3	Identification of entity with reporting obligations (s. 54(2))
Describe the reporting entity's structure, operations and supply chains	Section 2 Section 3	Organisation structure, business and supply chains (s. 54(5)(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))
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	<p>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))</p> <p>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))</p>
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))
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
Information that the reporting entity, or the entity giving the Statement, considers relevant	Section 1 Section 7	N/A

# SCHEDULE "C"

## Canadian Modern Slavery Act (Mandatory reporting requirements)

	Reference in this Statement
Identify the reporting entity	Schedule "A"
Describe the reporting entity's structure, activities and supply chains	Pages 4,5,6,7 of Schedule "B"
Describe its policies and its due diligence processes in relation to forced labour and child labour	Appendix A of Schedule "B" Global Human Rights Policy
Describe parts of the 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	Pages 9, 10, 11 of Schedule "B"
Describe any measures taken to remediate any forced labour or child labour	Pages 12, 13 of Schedule "B"
Describe any measures 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	Page 13 of Schedule "B"
Describe the training provided to employees on forced labour and child labour	Pages 2, 12 of Schedule "B"
Describe how Computershare assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Page 14 of Schedule "B"