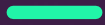# Modern Slavery Statement

## 2021

# Introduction

## Acknowledgment of Country

We pay our respects to the Traditional Owners of the lands where we work as well as the lands through which we travel. We recognise Indigenous peoples' continuing connection to land, place, waters and community. We pay our respects to their cultures, country, and elders past, present, and emerging.

## Introduction

Iress Limited (Iress) and companies within its group (together, the Iress Group) are committed to complying with all applicable legal obligations including, without limitation, the Modern Slavery Act 2015 (UK) (a UK Act) and the Modern Slavery Act 2018 (Cth) (an Australian Act) (the Acts). This statement is intended to address Iress Group's obligation under the Acts.

Iress reports its results on a calendar year basis and this statement relates to the reporting period 1 January 2021 to 31 December 2021 (the reporting period).

## Key achievements in 2021

- Implemented supplier management system with real-time monitoring of suppliers and supply chain risks using specialist market data vendors including Achilies, Dow Jones AME, and Ecovadis.
- Created a dedicated Environmental, Social & Governance (ESG) function at Iress to develop a strategy and embed sustainability into business operations including risk assessment.
- Established a cross-functional modern slavery working group (Working Group) with representation from ESG, Legal, Risk, Compliance, Procurement, IT, HR teams across the Iress Group, and with Executive oversight.
- Discussed modern slavery expectations with key suppliers during periodical reviews.
- Provided online training to all Iress people including the Board, Leadership team, and employees. This training covered industry-specific risk identification surrounding modern slavery and human rights.
- Conducted modern slavery risk assessments across suppliers, with a deeper dive into high-risk industries.

# Structure

## Structure, reporting entities & the process of consultation

Iress Limited is a public company incorporated in Australia and listed on the Australian Stock Exchange (ASX). It is the ultimate parent in the Iress Group. Details of the Group's wholly-owned subsidiaries are listed in the Iress 2021 Annual Report (p 100).

This statement is a joint Modern Slavery Statement made on behalf of the following entities (collectively, **Reporting Entities**):

- Iress Limited (ACN 060 313 359) (IRE:ASX) and its controlled entities
- Iress Wealth Management Pty Ltd (ACN 095 619 837)
- Iress FS Limited (company number 02958430)
- Iress Portal Limited (company number 2596452)
- Proquote Limited (company number 03851830)
- O&M Life & Pensions Limited (company number 02717535)

During the reporting period, Iress actively engaged and consulted with all owned and controlled companies in the development of this statement including:

- Management of all businesses across the Iress Group is overseen by the Executive team, therefore, members of that team were consulted during the preparation of this Statement.
- During the development of the ESG strategy in 2021, the Iress Group was engaged throughout internal and external stakeholder interviews covering the topics of environment, human rights including modern slavery and social sustainability.

- In addition, a global review of the Iress Group's internal ESG processes, and external ESG best practice and methodologies, was undertaken to inform the content in this statement.
- Throughout the reporting period, senior managers were consulted via the Working Group with representatives discussing details of the reporting requirements of the Modern Slavery Act 2018 (Cth) & Modern Slavery Act 2015 (UK); information regarding the actions to be taken by the Iress Group to address these requirements and sharing relevant materials and updates.

# Operations

Iress is a leading technology company, designing and developing software and solutions for the financial services industry. Iress' operations include functions focused on product and technology, client solutions, commercial engagements and corporate areas of finance, people, legal, ESG, and communications and marketing.

Iress employs over 2200 people and has offices in Australia, the United Kingdom, South Africa, Canada, Singapore, the United States, France, Tunisia, and New Zealand.

By location, our people across the globe are distributed as follows:

- 1,200 Asia Pacific
- 725 UK & Europe
- 244 Africa
- 55 North America

## Our software & clients

| Financial advice | Trading & market data | Investment management |
|---|---|---|
| **Software** | | |
| Integrated financial advice software offering: <br><br> • client management <br> • business automation <br> • portfolio data <br> • research <br> • financial planning tools <br> • scaled advice journeys <br> • digital client solutions <br> • data-driven compliance & analytics <br> • regulatory obligations management. | Global trading & market data software including: <br><br> • market data <br> • trading interfaces <br> • order & execution management <br> • smart order routing <br> • FIX services <br> • portfolio management <br> • securities lending <br> • analytical tools <br> • algorithmic trading <br> • market making <br> • CFD clearing <br> • post-trade solutions <br> • trading & market data APIs. | Global investment management & trading software including: <br><br> • portfolio management <br> • order & execution management services <br> • FIX services <br> • analytical tools <br> • connectivity. <br><br> Integrated software solution offering: <br><br> • market data <br> • order management portfolio <br> • management <br> • client relationship management <br> • wealth management. <br><br> Funds administration services including: <br><br> • fund registry <br> • retail platform licensing & technology <br> • fund data distribution via Iress Blockchain. |
| **Clients** | | |
| Institutional & independent advisory. | Institutional sell-side brokers, retail brokers & online brokers. | Investment managers, investment platforms, fund managers, private client advisers & managers, wealth managers, custodians & retail platforms. |

**Our software & clients (cont)**

| Superannuation | Mortgages | Life & pensions |
|---|---|---|
| **Software** | | |
| Superannuation administration software offering:<br><br>• fund registry<br>• digital member portal<br>• digital advice solutions<br>• fund administration services. | Multi-channel mortgage sales & origination software including:<br><br>• automated workflow<br>• application processing<br>• connectivity.<br><br>Mortgage intermediary software including:<br><br>• mortgage comparison mortgage advice<br>• lender connectivity. | Insurance & pension sourcing software including:<br><br>• quoting<br>• comparison<br>• application processing. |
| **Clients** | | |
| Superannuation funds. | Mortgage lenders & mortgage intermediaries. | Institutional & independent advisory & mortgage intermediaries. |

## Iress Foundation

Iress Foundation was established in 2017 to focus our effort and support towards an already strong and engaged community. The guiding principles established then still remain relevant today: facilitate, support, and promote people engagement; and make a visible, reliable, and meaningful contribution to partner charities. Employees receive three days of Iress Foundation leave annually to contribute to the community.

Today, Iress Foundation has a structured framework with focus on three causes aligned to Iress' business areas and communities as well as the UN Sustainable Development Goals (SDGs):

• Quality IT education (SDG 4).
• Decent work (SDG 8).
• Provision of services to charities (SDG 17).

More information about Iress Foundation can be found in Iress' 2021 ESG report, available here.

In 2021, as part of our commitment to decent work, we employed two software engineers from Syria and Iraq. This initiative was to support refugee employment through Talent Beyond Boundaries (TBB)—a global non-profit working with governments and the private sector to give refugees, and other displaced people, equal access to skilled migration opportunities. So far, Iress has hired and relocated five skilled refugees and their families, as well as raised funds for TBB.

**People by contract & region**

| | Contractor | Permanent | Fixed term |
|---|---|---|---|
| Australia | 47 | 1119 | 37 |
| Canada | 0 | 50 | 0 |
| France | 3 | 42 | 0 |
| New Zealand | 0 | 11 | 0 |
| Singapore | 0 | 33 | 0 |
| South Africa | 1 | 216 | 1 |
| Tunisia | 0 | 27 | 0 |
| United Kingdom | 7 | 680 | 3 |
| United States | 0 | 5 | 0 |
| Remote* | 104 | | |

*Remote refers to a group of contractors where work is outsourced to a location outside of the Iress regions, acquired as part of the OneVue acquisition in 2020.*

**Recruitment process**

As part of our recruitment process, we undertake extensive pre-employment background checks for prospective employees—including local and international criminal history checks as listed in the table on the next page.

| Region | Recruitment checks |
|---|---|
| APAC | • Proof of eligibility to work - passport/visa is obtained<br>• Proof of address check completed to confirm residency<br>• National Police History check<br>• Credit check only completed for executives / finance personnel<br>• Employment verification<br>• Qualification verification - highest level checked<br>• Resume assessment<br>• Banned persons list<br>• International watch lists check |
| North America | • Social insurance number check<br>• Criminal check<br>• Credit check<br>• 5 years of employment referencing<br>• Highest Education Verification |
| Africa | • Copy of ID or passport with work visa<br>• ID validation<br>• Verification check<br>• Criminal check<br>• ITC check that confirms past employment<br>• A full credit record<br>• Two reference checks for confirmation of employment<br>• Qualification verification and copies of certificates saved<br>• Directorship checks to verify if an individual has ownership of or directorship in other organisations |
| UK | • Proof of eligibility to work in the UK - either a passport or full birth certificate<br>• Proof of national insurance number<br>• Basic criminal record check<br>• Credit check<br>• Electoral roll<br>• Risk and compliance checks<br>• 5 years of employment referencing<br>• Highest education verification<br>• Resume check for accuracy - aligned to pre-employment screening entry data |

# Supply chain

Iress' principal suppliers include technology infrastructure providers, software suppliers, suppliers of office space and associated services, banking services providers, outsourced service providers for various disciplines, as well as professional consultants in finance, legal, and communications and marketing.

Iress monitors all vendors using live market data triggers, further detail is noted in the **'Real-time monitoring data details'** section below.

An important aspect of the process of engaging new suppliers involves discussing alignment between the Iress Supplier Code of Ethics and Conduct,

available here, and the relevant supplier's own policies.

For existing critical vendors, the frequency of evaluating and completing renewed due diligence is increased and includes, but is not limited to: site visits, key contact alignment, and real-time monitoring.

Suppliers outside of the 'critical' grouping have also been segmented on the basis of products/services supplied. This segmentation allows additional focus on areas where there may be red flags for potential modern slavery issues, or industry-specific practices that require additional investigation.

**Suppliers by country**

| Country | Suppliers (numbers) | Percentage of overall spend on local suppliers |
| --- | --- | --- |
| Australia | 542 | 75% |
| New Zealand | 73 | 10% |
| Singapore | 72 | 81% |
| Canada | 121 | 74% |
| France* | 223 | 39% |
| South Africa | 431 | 95% |
| UK | 435 | 89% |
| USA | 38 | 100% |

*Also includes Tunisia

**Top procurement categories**

| Industry | Industry risk | Percentage of supply chain (%) | Country risk | Country |
|---|---|---|---|---|
| Other activities auxiliary to financial service activities (eg stock exchanges) | Low | 7% | Low | Australia |
| Computer programming, consultancy & related activities | Low | 6% | Low | Australia |
| Data centres | Low | 4% | Low | Australia |
| Insurance, reinsurance & pension funding (except compulsory social security) | Low | 3% | Low | United Kingdom |
| Financial service activities (except insurance & pension funding) (eg property leasing) | Low | 3% | Low | Australia |
| Computers, monitors & technology solutions | Low | 3% | Medium | South Africa |
| Software publishing | Low | 2% | Low | Australia |
| Computer programming, consultancy & related activities | Low | 2% | Low | Australia |
| Real estate activities | Low | 2% | Low | Australia |
| Other activities auxiliary to financial service activities (eg market data) | Low | 2% | Low | USA |
| Financial service activities (except insurance & pension funding) (eg advisory services) | Low | 2% | Low | Australia |
| Construction of buildings (eg office fitout) | High | 2% | Low | Australia |

# Modern Slavery Framework

Iress is committed to better understanding and more effectively managing the risk of modern slavery within our operations and supply chain. Iress' Modern Slavery Framework sets out the key elements required to effectively manage modern slavery risks and to support the development of prioritised improvements in a coordinated and focused manner. The framework also provides Iress with the ability to assess the effectiveness of actions taken to manage modern slavery risks over time.

**Modern slavery working group**

**Risk identification**

Due diligence, questionnaires & reviews

**Risk management**

Regularly review, test & monitor

**Grievance & remediation**

Whistleblower & corrective action

**Governance**

Policies, processes & procedures

**Monitoring & reporting**

Internal reporting channel
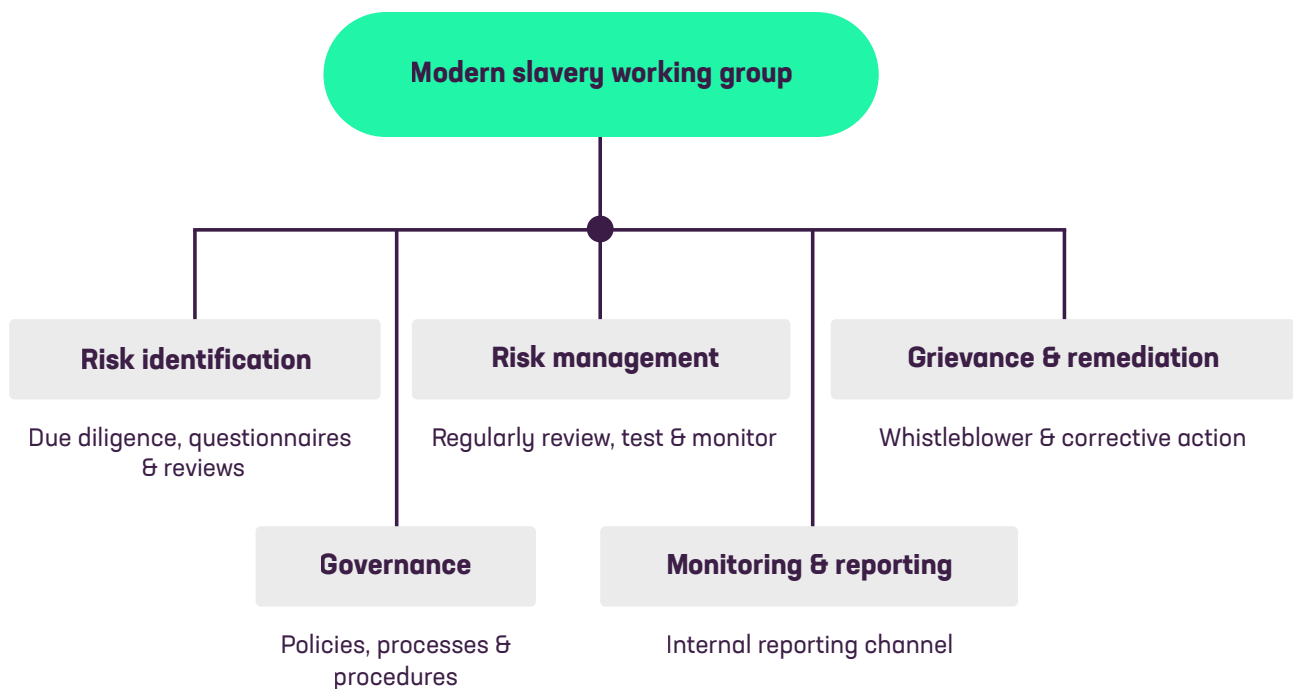
Iress' Modern Slavery Framework is based on a benchmark analysis of external best practices within the areas of modern slavery and human rights. These best practices were informed by the following guidance and reports:

| Author/s | Report |
|---|---|
| Australian Border Force | Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, 2019 |
| Australian Council of Superannuation Investors & KPMG | Modern Slavery Risks, Rights and Responsibilities - A Guide for Companies and Investors, 2019 |
| Australian Council of Superannuation Investors & Pillar Two | Moving from paper to practice: ASX200 reporting under Australia's Modern Slavery Act, 2021 |
| International Labour Organisation | Global Estimates of Modern Slavery, 2017 |
| United Nations | Guiding Principles on Business and Human Rights, 2011 |
| US Department of State | Trafficking in Persons Report, 2021 |
| Walk Free Foundation | Global Slavery Index, 2018 |

# Governance

Iress operates under a set of well-established corporate governance policies and processes that reinforce the responsibilities of all directors, officers, and our corporate entities, as set out in the Corporations Act 2001 (Cth) (Corporations Act) and the Listing Rules of the Australian Securities Exchange (ASX).

Many of these governance elements are also embedded in our Constitution. The Iress Board operates in accordance with a Board Charter and has ultimate responsibility for setting strategy and policy for the Group globally.

We believe that adopting a high standard of corporate governance is essential to sustainable long-term performance and value creation. The governance structure we have put in place to support ESG includes modern slavery considerations.

| | |
|---|---|
| **Iress Board** | To oversee, and consider recommendations from the Audit & Risk Committee on the Company's strategy, policies, processes and performance in relation to ESG matters. |
| **Audit & Risk Committee** | The Committee is responsible for reviewing and monitoring the operational, regulatory, and reputational risks and impacts of ESG on the Company and provide insight and guidance with respect to the Company's management of such risks and impacts. |
| **CEO & Leadership team** | Approves the ESG strategy and annual plan. Monitors the progress of the plan on a quarterly basis. |
| **Chief Legal Officer** | Oversees the management of strategic initiatives including Modern Slavery Working Group. |
| **ESG function** | Works across the business to coordinate and support the delivery of initiatives. |

# Risk in our operations

Given the nature of our operations and an evaluation of hiring practices and employment terms, internal employee operations were identified as little to no risk in modern slavery terms. The following were identified as the highest risk industries of our operations:

| Location | Industries | Modern slavery risk/indicators of modern slavery |
|---|---|---|
| Asia Pacific | • Physical services (cleaning, catering & security)<br>• Offshore professional services | • Forced/bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers<br>• Offshore services in the Philippines & India present a higher geographical risk due to weaker local worker protection, as well as using temporary or foreign workers |
| North America | • Physical services (cleaning, catering & security) | • Forced/bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers |
| Europe | • Physical services (cleaning, catering & security) | • Forced / bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers |
| Africa | • Physical services (cleaning, catering & security) | • Forced/bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers |

# Risk in our supply chains

In 2021 Iress engaged a third-party market data vendor (Know Your Supplier or KYS) to provide a consolidated, real-time watchlist across all non-government suppliers.

This allowed us to:

- maintain an up-to-date view of our supplier base
- flag areas that need to be addressed directly with suppliers
- ensure suppliers' alignment to Iress' own Supplier Code of Ethics.

**Real-time monitoring data details**

| Association | Assessment | Details |
|---|---|---|
| **Dow Jones AME** | Environmental non-compliance flags | • Environmental issues<br>• Product/service issues<br>• Production/supply chain issues |
| | Ethical/regulatory non-compliance flags | • Corruption issues<br>• Fraud issues<br>• Regulatory Issues |
| | Labour, health & safety | • Discrimination/workforce rights issues<br>• Human rights issues<br>• Workforce disputes<br>• Workforce health/safety issues |
| | Sanctions check | • Company and key person sanctions list & alert |
| **D&B or Credit Safe or Creditor Watch** | Financial risk check | • D&B SER rating<br>• Credit safe overall rating<br>• Creditor watch overall financial risk rating |
| **EcoVadis** | Sustainability rating | • Badges & inherent risk ratings |
| **Achilles** | Labour self-assessment | • Supplier participation required |

*This list is to be reviewed and expanded with additional feeds in 2022.*

The initial and ongoing management of modern slavery risks in Iress' supply chain is managed by the cross-functional Working Group and Framework. This brings coordinated discipline and rigour to the evaluation of potential risks and the mitigation of those risks.

Iress' rules of engagement are established with suppliers via the Supplier Code of Ethics and Conduct. This document states that suppliers are to conduct their businesses in a manner that ensures Iress can meet its obligations under the Acts. The Supplier Code of Ethics and Conduct was reviewed and updated in February 2021. Importantly, it confirms a zero-tolerance posture for modern slavery practices.

When engaging with new suppliers through a request for proposal (RFP) process, Iress follows this broad process:

- Iress provides prospective suppliers with a link to the Iress Corporate Governance documents including:
  - the Modern Slavery Act Statement and
  - the Supplier Code of Ethics and Conduct Policy.
- Where prospective suppliers believe or suspect that their operations are not aligned with these policies, they are directed to contact Iress to discuss the matter.
- Iress will then discuss the areas of concern with the prospective supplier, and if a risk of non-compliance with modern slavery obligations is found, Iress would not proceed further with that entity.
- Suppliers complete an extensive section on Human Rights including modern slavery. This information is processed and checked by the Procurement team and any flags raised in a timely manner.

Iress has analysed where it may cause, contribute to, or be directly linked to, modern slavery risks based on a review taking known risk factors into account, including risks related to:

- sector and industry
- products and services
- geographic
- individual entities in our supply chain.

The outcome of the review is set out in the table on the next page titled 'High-risk areas'.

**Cause:** There is negligible or no modern slavery risk related to our employees and contractors engaged in our core operations. Contractors are highly skilled and well remunerated.

**Contribute:** We recognise that cost-reduction or other activities may inadvertently facilitate or incentivise modern slavery in our supply chains. We review employment contracts for suppliers of facilities management staff to ensure changes in wage rates are reflected in the employees' own contracts.

**Directly linked:** There are risks that we are directly connected to through the activities of entities in extended contractual supply chains. For example, in electronics manufacturing and the source materials for that manufacturing. Where appropriate we have included modern slavery provisions in our supplier agreements that obligate the supplier to comply with applicable modern slavery laws, to conduct appropriate due diligence, and warrant that it (and its personnel) have not been convicted of any offence involving modern slavery.

**High-risk areas**

| Industries | Modern slavery risk/indicators of modern slavery |
|---|---|
| Electronic hardware including computers, laptops, and phones. Consumer electronic devices have been named one of the highest risk imports for modern slavery by the Global Slavery Index. | • Forced/bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers<br>• High-risk geographies<br>• Conflict materials |
| Office equipment | • Forced/bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers<br>• High-risk geographies<br>• Conflict materials |
| Merchandise and promotional material | • Forced/bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers<br>• High-risk geographies |
| Recruitment strategies by suppliers | • Forced/bonded labour<br>• Excessive working hours<br>• Underpayment of wages<br>• Exploitation of migrant workers<br>• High-risk geographies |

**Review of supplier employment contracts**

Iress recently engaged a supplier in the Philippines to facilitate a labour hire arrangement. Part of the due diligence for this supplier included the review of the template employment contract to ensure that the local legislated pay and benefit levels were in fact included, and for the payment of such benefits to constitute a back-to-back obligation on the supplier. This checking is also carried out for suppliers of facilities management staff, to ensure that changes in wage rates are reflected in the employees' own contracts. Whenever there is a legislated amendment to wage rates, the facilities manager will sit down with the supplier (for instance cleaning contractor, housekeeping, or concierge) to work through the wage rate change on an individual employee basis. This is to ensure the rates are accurately reflected in the employees' payslips. It also ensures that the working hours calculation is correctly reflected, and does not exceed local maximums.

# Supporting policies

Iress' purpose, values, and policies guide the decisions we make and actions we take as a company, and as individuals. We adopt a series of due diligence activities across the procurement lifecycle to ensure we are engaging suppliers that uphold our corporate requirements, policies, and values—suppliers who do not pose a risk of modern slavery within our supply chain.

This includes providing our employees, suppliers, and stakeholders with a clear direction of Iress' expectations of fairness, transparency, and accountability through the following policies:

| Policy | Outline |
|---|---|
| **Whistleblower** | Iress' Whistleblower Policy allows employees to raise concerns including modern slavery or human rights abuses in a confidential manner. The policy includes the provision of an external provider, 'Your Call Whistleblowing Solutions'. |
| **Equality, diversity & inclusion** | Iress is committed to enabling an organisational culture and workplace that fosters equality, diversity, and inclusion across all levels of our business. We aim to provide a workplace where every individual has equal opportunity to contribute and is valued for that contribution. Our commitment to this is outlined in the Global Diversity Policy and our annual reporting to the Workplace Gender Equality Agency (WGEA).<br><br>In South Africa, in line with Employment Equity legislation, we have developed a three-year employment equity plan, produce an annual report and hold quarterly employment equity committee meetings. |
| **Health & safety** | Iress operates a Health & Safety (H&S) Management System that meets the requirements of ISO 45001:2018. The management system details the operational and occupational controls and processes that we have put in place to manage the H&S of our offices, and protect our staff on a global basis. Our system covers both our legal requirements and H&S obligations, and has been designed to provide all of our staff with the information needed to conduct their work in a safe manner. Additionally, it is intended to provide clients with an overview of how we meet our corporate responsibilities through an innovative, practical, and highly visible health and safety initiative. |

**Supporting policies (cont)**

| Policy | Outline |
|---|---|
| **ESG** | In 2021 we developed our environmental, social and governance (ESG) strategy. We are committed to observing internationally-recognised risks, such as climate change and modern slavery, and acting on these as part of our ESG roadmap. Our plan for achieving impact moving forward centres around:<br>● **environment:** driving a focused emissions management system and implementing effective e-waste partnerships<br>● **social:** fostering a culture of inclusion and belonging by enhancing our diversity strategy and strengthening our modern slavery risk management processes<br>● **governance:** reporting on the Task Force on Climate-Related Financial Disclosures (TCFD). |
| **Workplace discrimination, bullying & harassment** | Iress is committed to fostering a workplace free from workplace discrimination, bullying, harassment, sex-based harassment, and victimisation. Every member of our organisation has a right to feel safe and respected, and in turn the responsibility to prevent workplace discrimination, bullying, harassment, and victimisation. |
| **Information security** | Information security is the fundamental discipline of ensuring the confidentiality, integrity, and availability of our systems and data. We employ four key information security frameworks at Iress, in addition to other standards and audit frameworks required for specific areas of the business, for example ATO, SWIFT and ASAE3402. Iress' ISO/IEC 27001:2013 certification is valid until April 2025 which requires organisations to put in place a broad range of internal information security risk controls designed to reduce the likelihood and impact of information security incidents (whether innocent or malicious), if and when they occur. |

## Grievance & remediation

Iress continues to provide avenues for employees to safely raise concerns about modern slavery within Iress' operations and supply chain. Iress continues to monitor and respond to potential modern slavery incidents. No grievances were raised in the reporting period.

# Measuring effectiveness

Our global risk assessment and audit programs generate valuable data and drive improvement and transparency across our supply chains. The data enables us to deeply understand our risks, and develop strategies and programs to address them.

| Measure | Description |
| --- | --- |
| Governance & due diligence | As part of our risk culture of continuous improvement, we regularly review, test, and monitor our modern slavery processes and procedures to ensure they remain appropriate and are performing effectively.<br><br>Under our Risk Management Framework, sustainability risk (which encompasses modern slavery risks) is a key risk for Iress. Reflecting the importance of modern slavery risks for Iress and the need for appropriate oversight, we have made a number of enhancements to our internal governance processes in recent years. These include the introduction of a Modern Slavery Working Group and the establishment of a formal ESG function. |
| Procurement & supply chain | Supplier segmentation provides the ability to apply targeted focus to areas of heightened supply chain risk, additionally, realtime KYS covering all suppliers allows Iress the ability to identify, track, and remediate supply chain risks efficiently. This gives Iress additional capability to ensure alignment with the Supplier Code of Ethics. |
| HR practices | Annual review of contractors employed through external agencies to ensure wages are above the minimum wage. |
| Process for feedback | Annual employee ESG survey measures improvement and feedback on initiatives. Materiality process with internal and external stakeholders seeks to identify and address appropriate issues. |
| Training | Tracking participation and awareness of material modern slavery concerns. |
| Whistleblower hotline | Calls to our confidential and anonymous whistleblower hotline are reviewed for issues raised in relation to modern slavery. No reports of modern slavery or modern slavery indicators have so far been received through this mechanism. |

# Ongoing commitment

Iress is committed to ensuring that there is no modern slavery or human trafficking in any part of its business. Therefore, Iress has included policy statements in its Code of Ethics and Conduct Policy, and its Supplier Code of Ethics and Conduct, which reflect Iress' commitment to ensure that slavery and human trafficking do not take place anywhere within its business or supply chain.

Iress completed its fourth edition of ESG reporting (2021) in accordance with the GRI Standards: Core Option of reporting. The GRI reporting principles for defining report content were applied through the preparation of the report including; stakeholder inclusiveness, sustainability context, materiality, and completeness. Iress reported on the following GRI disclosures relevant to Human Rights:

- GRI 102-9 Supply Chain
- GRI 405 Diversity and Equal Opportunity 2016
- GRI 406 Non-discrimination 2016
- GRI 412 Human Rights Assessment 2016
- GRI 414 Supplier Social Assessment 2016.

In 2022, the Modern Slavery Working Group is focused on:

- continuing training and awareness programs internally and externally
- extending the supplier deep-dive process across new and existing suppliers not currently in scope, to identify and mitigate risks associated with modern slavery where required
- strengthening our supplier audit and assurance activities, in line with our contractual obligations
- continuing the internal assurance programs around our procurement activities by using our modern slavery framework and developing new toolsets to support these processes
- further engagement with suppliers to raise awareness and improve performance and corrective actions to mitigate risk
- ongoing supplier mapping as we continue to invest in and understand this area across our operations. The current supply chain assessment looks at suppliers categorised under spend to prioritise the most material risks.

As part of our Risk Management Framework, Iress' Board Audit & Risk Committee Charter includes areas: identify, assess, monitor, and manage risk.

# Approval

This statement was approved by the board of Iress Limited in its capacity as principal governing body of Iress Limited on 4 May 2022.

This statement is signed by Andrew Walsh in his role as the Managing Director & CEO of Iress Limited on 4 May 2022.

Signed:

Andrew Walsh
Managing Director & CEO of Iress Limited

4 May 2022.

Iress Limited | A.B.N. 47 060 313 359

# Appendix

| Reporting criteria | Pages |
|---|---|
| Section 16 (a) Identify the reporting entity. | 2 |
| Section 16 (b) describe the structure, operations and supply chains of the reporting entity. | 3-10 |
| Section 16 (c) describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls. | 14-18 |
| Section 16 (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. | 13, 16-20, 22 |
| Section 16 (e) describe how the reporting entity assesses the effectiveness of such actions. | 21 |
| Section 16 (f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls. | 3 |
| (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement. | 2-3 |
| Section 16 (g) include any other information that the reporting entity, or the entity giving the statement, considers relevant. | 11-12, 22 |