# Computershare Limited Human Rights Policy



## OTHER RELEVANT GLOBAL POLICIES

- > Code of Conduct
- > Anti-Bribery and Corruption Policy
- > Whistleblower Policy
- Diversity and Inclusion Policy

#### **INTRODUCTION**

We consider that businesses have an important role to play in respecting human rights and we welcome legislative and other developments that are intended to improve protection for some of the world's most vulnerable people.

#### **PURPOSE**

The purpose of this policy is to outline our commitments and expectations in relation to human rights protection.

#### **APPROACH**

We consider that our 'Being Purple' ways of working, particularly our commitment to 'doing the right thing', provide concrete guidance for our global and regional processes and procedures to ensure that we meet and further our commitments to human rights protection.

Our commitments to supporting human rights include the following:

- > Promoting diversity, equality and fairness, as well as the physical and mental health and safety our staff;
- > Eliminating the risk of discrimination, bullying, bribery or corruption in our operations; and
- Conducting our business in a matter that respects the rights and dignity of all people, complying with all legal requirements;
- Prohibiting the use of child labour, forced or compulsory labour or other forms of modern slavery in our operations; and
- > Ensuring our staff maintain and enhance our commitment to human rights protection.

We expect 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 organisation and supply chain.

Should we discover that any of our suppliers is (or may be) associated with human rights violations, appropriate action will be taken in a timely manner. Actions may include notification to regulators and/or law enforcement agencies, engaging with the

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relevant parties to promote good practice and/or avoiding or exiting the business relationship.

#### **EXPECTATIONS OF STAFF AND SUPPLIERS**



- > Comply with all applicable laws, regulations and Computershare policies
- > Treat all persons fairly and with respect
- Report conduct that you believe contravenes
  Computershare's expectations



- Threaten or take disciplinary or retaliatory action against anyone for raising or helping to address a human rights concern
  - Permit or tolerate child labour, forced or compulsory labour

#### **APPLICATION**

This policy applies to any person working for the Computershare Group in any capacity. The consequences of not following this policy may be severe, up to and including termination of employment.

All Computershare employees, agents and representatives are required to escalate and report any instance of non-compliance with this policy or any inappropriate conduct contrary to this policy to a senior manager within your business division or function.

If you do not feel comfortable reporting a matter to a senior manager, you can report it to your Regional Whistleblower Officer. You may, if you wish, do so anonymously.

#### **RESPONSIBILITY**

Computershare's Group Head of People is principally responsible for the maintenance and application of this policy, with support from our Global Vendor Management and Procurement teams.

This version of the Policy was approved by the Board of Computershare Limited on 8 June 2019.