



**2025**

**Modern Slavery  
Statement**



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## About this Statement

Iress Limited submits this statement as a 'joint statement' pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (Australian Act). Iress' reporting entities in Australia for the purpose of the Australian Act are Iress Limited (ACN 060 313 359) and its subsidiaries Iress Wealth Management Pty Ltd (ACN 095 619 837) and Iress International Holding Pty Ltd (ACN 164 903 735).

Iress FS Limited (Company Number 02958430) is a commercial entity registered in the UK and is required to publish an annual Modern Slavery Statement pursuant to the *Modern Slavery Act 2015* (UK) (UK Act). Iress Limited submits this joint statement on behalf of Iress FS Limited pursuant to Section 54 of the UK Act.

The terms "Iress", "Company", "Group", "our business", "organisation", "we", "us", and "our" refer to Iress Limited and include all reporting entities in Australia and the UK and all wholly owned subsidiaries as set out on page 112-113 of Iress' 2025 Annual Report, unless otherwise stated.

This statement is for the calendar year ending 31 December 2025 (the reporting period, FY25). All references to currency are in Australian dollars.

### Our 2025 reporting suite

For further disclosure information, including the 2025 Annual Report, refer to Iress' Investor centre website <https://www.iress.com/about/investors/>.

### Feedback

For any questions or comments about this statement, please complete the [contact form](#) on our website.

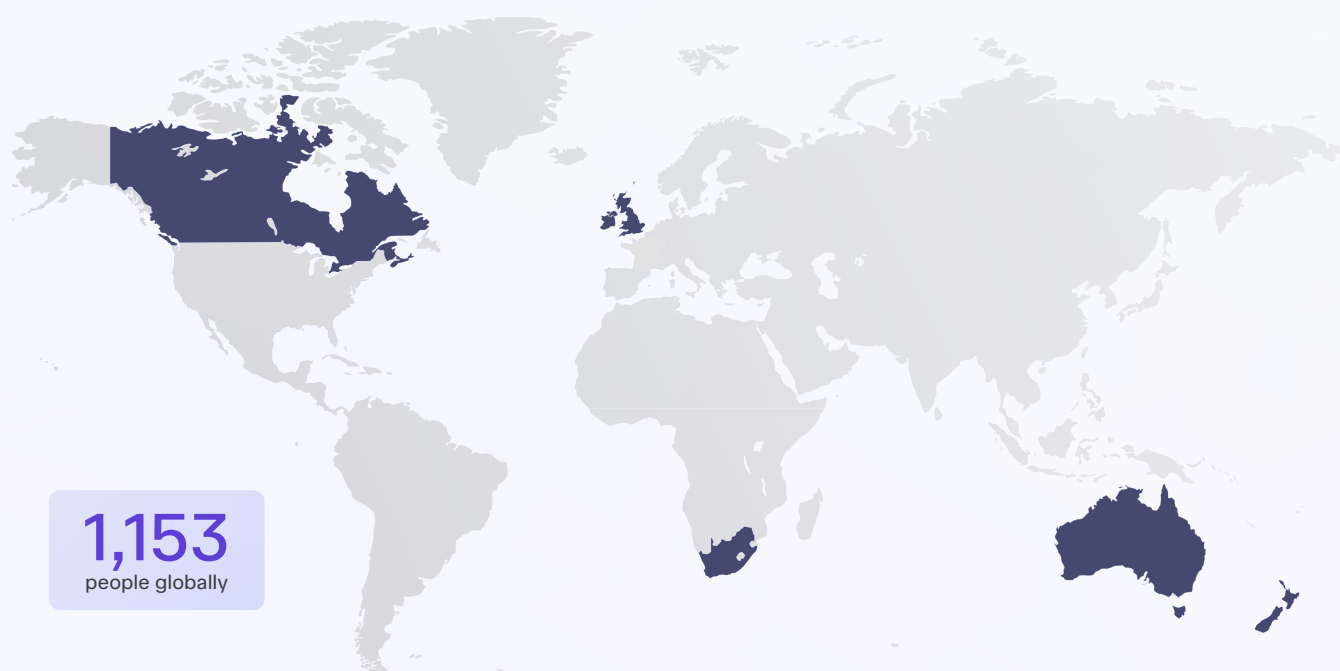
### Acknowledgement of Country

We pay our respects to the Traditional Owners of the lands where we work as well as across 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 and present.

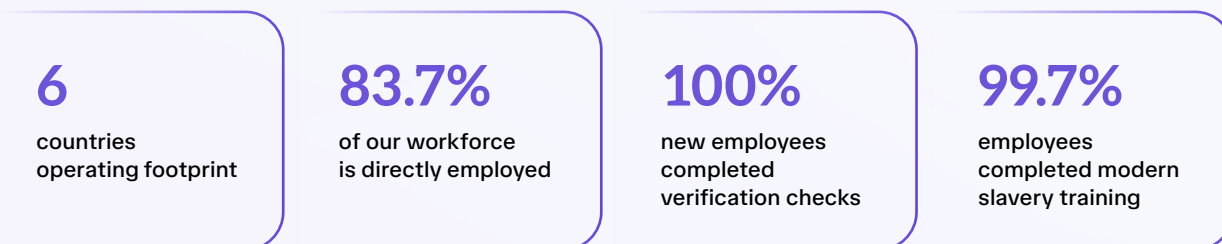
# Our structure, operations and supply chains

## Structure and operations

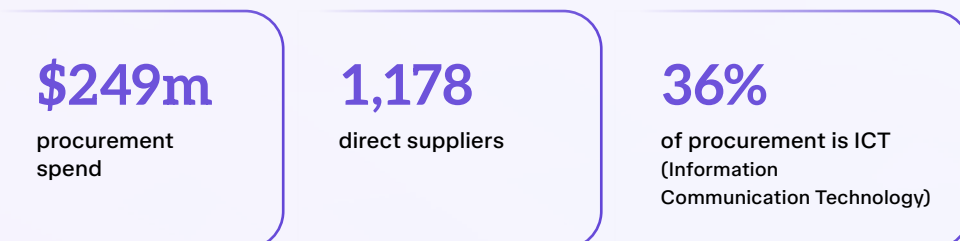
Iress is a leading technology company designing and developing software for the financial services industry, primarily focusing on Wealth Management and Global Trading & Market Data. Iress is a public company incorporated in Australia and listed on the Australian Securities Exchange (ASX:IRE). It is the ultimate parent company in the Iress Group. The Iress Group operates under one management structure and the same policies and governance arrangements apply throughout the Group.



## Operations



## Supply chain



## Software and clients

Our clients range from small retail to large institutional businesses across the financial services industry. Our technology sits at the centre of our clients' businesses, supporting their core operations with essential infrastructure and functionality, helping them to deliver to their clients, members and customers.

	Software	Clients
Financial advice	<p><b>Integrated financial advice software offering:</b></p> <ul style="list-style-type: none"> <li>client management</li> <li>business automation</li> <li>portfolio data</li> <li>research</li> <li>financial planning tools</li> <li>scaled advice journeys</li> <li>digital client solutions</li> <li>data-driven business analytics</li> <li>regulatory obligations management</li> <li>revenue and payments management</li> </ul>	<ul style="list-style-type: none"> <li>Institutional and independent advisory</li> <li>Superannuation funds</li> </ul>
Trading & market data	<p><b>Global trading and market data software offering:</b></p> <ul style="list-style-type: none"> <li>trading interfaces</li> <li>order and execution management</li> <li>smart order routing</li> <li>FIX services</li> <li>portfolio management</li> <li>analytical tools</li> <li>algorithmic trading</li> <li>post trade solutions</li> <li>market data</li> <li>trading and market data APIs</li> </ul>	<ul style="list-style-type: none"> <li>Institutional sell-side brokers</li> <li>Retail brokers</li> <li>Online brokers</li> </ul>
Investment management	<p><b>Global investment management and trading software offering:</b></p> <ul style="list-style-type: none"> <li>portfolio management</li> <li>order and execution management</li> <li>FIX services</li> <li>analytical tools</li> <li>connectivity</li> </ul> <p><b>Integrated software solution offering:</b></p> <ul style="list-style-type: none"> <li>market data</li> <li>order management</li> <li>portfolio management</li> <li>client relationship management</li> <li>wealth management</li> </ul>	<ul style="list-style-type: none"> <li>Investment managers</li> <li>Investment platforms</li> <li>Fund managers</li> <li>Private client advisers</li> <li>Wealth managers</li> <li>Retail platforms</li> </ul>
Product comparisons	<p><b>Mortgage intermediary software offering:</b></p> <ul style="list-style-type: none"> <li>mortgage comparison</li> <li>mortgage advice</li> <li>lender connectivity</li> </ul> <p><b>Protection and retirement sourcing software offering:</b></p> <ul style="list-style-type: none"> <li>quoting</li> <li>comparison</li> <li>application processing</li> </ul>	<ul style="list-style-type: none"> <li>Mortgage intermediaries</li> <li>Networks</li> <li>Institutional and independent advisory</li> </ul>

## Supply chain

Iress' total procurement spend in FY25 was \$249m across 1178 tier 1 (direct) suppliers. Our supplier arrangements range from one-off purchases of services through to multi-year contract agreements and include the engagement of small enterprises to large multinational corporations.

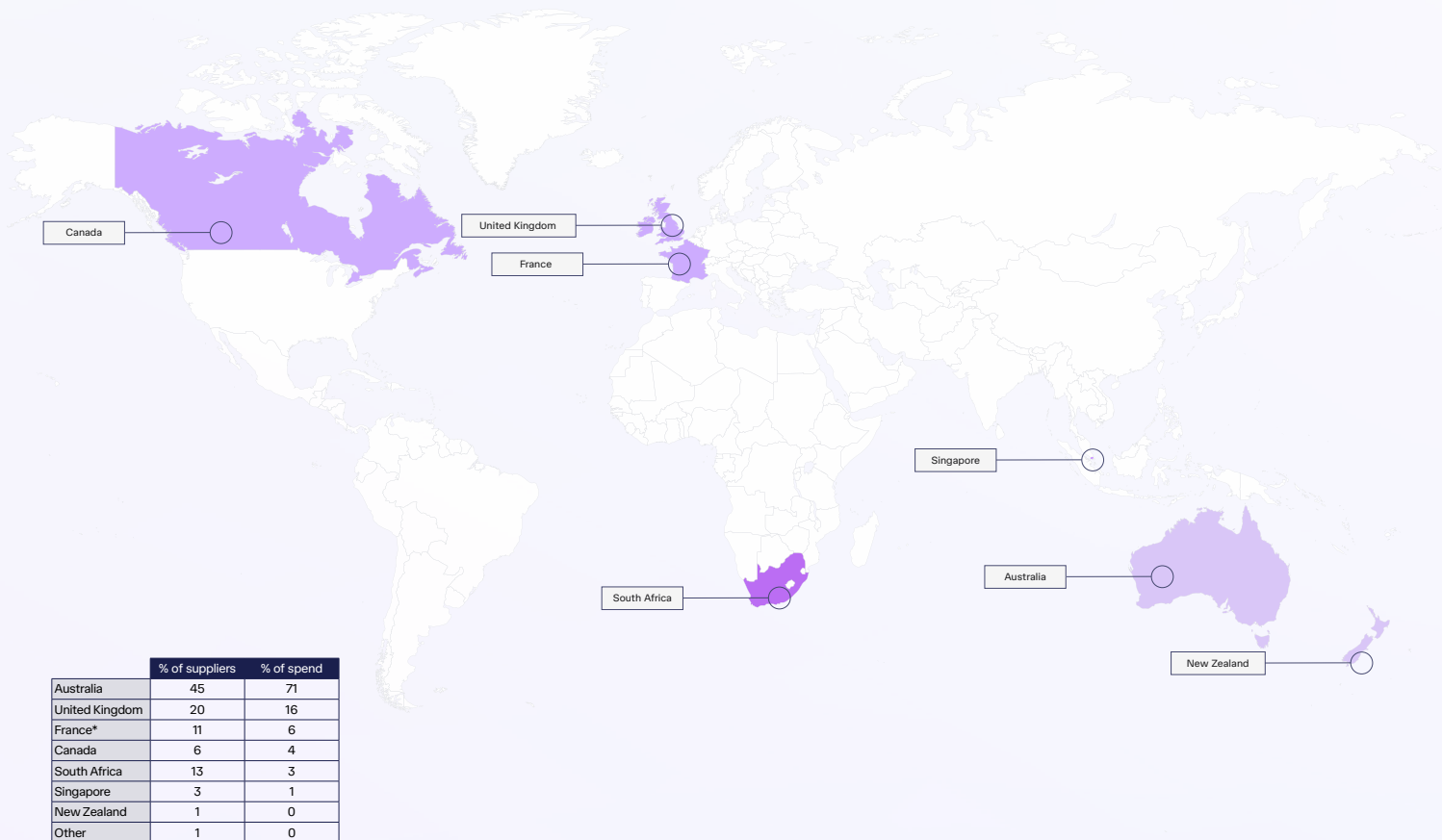
Our procurement teams focus on the procurement of stock exchange and financial data, information technology, professional services, workplace and facilities and corporate travel expenses.

## Primary procurement categories



## Spend and suppliers by billing country <sup>1,2</sup>

Our country and sector risk profiles are based on data sourced from reputable, globally recognised sources including the International Labour Organisation Global Estimates of Modern Slavery and the Walk Free Global Slavery Index (2023).



<sup>1</sup> Billing country does not necessarily indicate origin of supply.

<sup>2</sup> Modern slavery vulnerability (low to high) is based on the Walk Free Global Slavery Index (2023).

\* Spend primarily relates to QuantHouse (divested in August 2025).



# Modern slavery risks in our operations and supply chains

Modern slavery involves severe exploitation where threats, violence, coercion, or deception trap individuals in situations they cannot escape. It encompasses grave human rights violations, including human trafficking, forced labor, debt bondage, servitude, forced marriage and child exploitation.

Exploitation exists on a continuum, ranging from fair and safe employment to extreme abuse. Driven by underlying vulnerabilities such as poverty, social inequality, or lack of legal protection, individuals can easily slide down this spectrum. This fluidity makes detecting and addressing modern slavery a complex challenge.

Furthermore, the risk of modern slavery is dynamic. It fluctuates alongside changes in our operations, supply chain and external global factors like economic pressures and geopolitical conflicts.

## Risk assessment

To effectively identify and mitigate modern slavery risks, we regularly evaluate our exposure based on the UN Guiding Principles on Business and Human Rights (UNGPs). This process involves assessing whether our business activities might cause, contribute to, or be directly linked to modern slavery practices.

While the risk within our direct operations remains low due to internal controls and a skilled workforce, we recognise that our risk profile increases as we look further down our supply chain particularly within offshore outsourced services and the procurement of ICT hardware, facilities management, and merchandise.

## Type of involvement

### Hypothetical examples of how a financial services technology company may be involved in the continuum

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#### Cause

A business may cause modern slavery if its own activities or omissions directly result in modern slavery occurring.

A business directly hires software developers from overseas on company sponsored visas. Upon arrival, the company forces the developers to work excessive 80-hour weeks without overtime pay. Management explicitly threatens to cancel their visas and have them deported if they refuse the hours or attempt to resign, effectively using coercion to trap the employees in forced labour.

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#### Contribute

A business may contribute to modern slavery if its actions or omissions facilitate, encourage or incentivise a third party to cause modern slavery occurring.

A business receives complaints about exploitative practices by a facility management supplier (e.g., the company hired to clean its corporate data centres) but does not take action to investigate or seek to use its leverage to address the situation.

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#### Directly linked

A business may be connected to modern slavery if its operations, products or services including through a third-party have an adverse human rights impact.

A business may engage in responsible procurement practices, including supplier due diligence but it procures servers, laptops, or branded promotional merchandise from a supplier that exploits factory workers in producing those goods, despite the controls it has in place.

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# Actions taken to assess and address risks

## Governance and risk framework

Iress' modern slavery risk is integrated into our organisational Risk Management Framework (RMF) described in the [Annual Report](#). The RMF is underpinned by Iress' Three Lines of Defence model. The Board sets the risk appetite and provides oversight of management's execution of the RMF, which is implemented through our risk strategy. Iress' risk strategy is supported by risk class frameworks and policies. Our governance framework, which guides our sustainability strategy and modern slavery risk management is set out below.



## Policy framework

Key frameworks and policies supporting our approach are listed below. During the reporting period, we implemented a centralised intranet for policy storage and internal communication to ensure consistent awareness of our corporate expectations.

Category	Applicable policies	Key objectives
<b>People and culture</b>	<ul style="list-style-type: none"><li>▪ Recruitment, Screening and Remuneration</li><li>▪ Code of Ethics and Conduct</li></ul>	<ul style="list-style-type: none"><li>▪ Ensures fair recruitment, equitable pay and baseline behavioral standards</li><li>▪ Requires employees to uphold the law and report breaches</li></ul>
<b>Supply chain</b>	<ul style="list-style-type: none"><li>▪ Sustainable Procurement Policy</li><li>▪ Supplier Code of Ethics and Conduct</li></ul>	<ul style="list-style-type: none"><li>▪ Embeds ESG objectives into procurement</li><li>▪ Mandates non-discriminatory practices and ethical alignment from third-party suppliers</li></ul>
<b>Integrity and risk</b>	<ul style="list-style-type: none"><li>▪ Speaking Up Policy</li><li>▪ Anti-bribery and Corruption</li><li>▪ Conflicts of Interest</li><li>▪ Gifts and Hospitality</li></ul>	<ul style="list-style-type: none"><li>▪ Provides secure reporting channels for suspected abuses</li><li>▪ Enforces a zero-tolerance approach to bribery and manages undue influence</li></ul>
<b>Other</b>	<ul style="list-style-type: none"><li>▪ IT System Geographic Access Controls</li></ul>	<ul style="list-style-type: none"><li>▪ Prevents unauthorised offshoring to high-risk areas</li></ul>

## Due diligence and supplier engagement

To maintain a secure and responsible supply chain, we embed due diligence into our standard procurement processes, applying enhanced measures such as site visits and interviews for high-risk categories.

In 2025, we introduced a third-party monitoring platform to support the assessment of risks and controls across our supply chain. The tool uses supplier-specific insights based on the following methodology:

- **Inherent Risk:** The platform's model estimates a supplier's baseline exposure to human rights risks before mitigating controls are applied. It derives this baseline by evaluating independent Country and Industry risk factors, drawing on data from recognised frameworks such as the International Labour Organisation and global risk indices.
- **Governance Controls:** The tool assesses the systems, processes and commitments that entities have in place to manage risk across their direct operations and supply chain. The platform categorises these supplier measures as preventive, detective, corrective, or directive.
- **Residual Risk:** By combining the inherent risk estimates with the governance controls ratings, the platform calculates a supplier-specific view of residual risk. This framework highlights where risks remain most material, directing our attention toward suppliers with the least mitigated exposure.
- **Continuous Monitoring:** The system continuously tracks adverse labour and human rights events associated with suppliers and their corporate groups. It monitors credible global sources including regulatory disclosures, legal filings and NGO publications to systematically identify relevant controversies.

Where the platform identifies elevated residual risk indicators, these suppliers are identified for further engagement to encourage the adoption of stronger governance measures and recognised frameworks. Results of the supplier screening are listed below with half-year data due to platform implementation in the second half of the reporting period.



\* Controls include modern slavery reporting, government screening, workplace controls and responsible sourcing certificates.

### Case study: Tier 2 onsite assessment

In December, Iress conducted an on-site assessment of a tier 2 cleaning supplier at our Sydney office, to evaluate their labour and safety practices. The supplier demonstrated strong alignment with ethical standards, supported by comprehensive documentation including their Modern Slavery and Grievance policies. Key highlights from the assessment include:

- **Industry leadership:** The supplier is a founding member of the Cleaning Accountability Framework (CAF) and has achieved their highest pre-qualification standard.
- **Supply chain visibility:** They mitigate risk by directly hiring and paying employees for this site, eliminating subcontracting.
- **Labour rights:** The company enforces ongoing verification of legal working rights and ensures working hours and rest periods align with the Cleaning Services Award.
- **Health & safety:** The company manages employee wellbeing, including implementing collaborative solutions to balance safe after hours working temperatures.

## Operations

### Direct workforce

Our direct workforce is predominantly composed of skilled labour. The vast majority of our team members are located in regions recognised as having a low risk of modern slavery, backed by strong government regulations against such practices. To safeguard our direct operations, we maintain stringent recruitment protocols globally; this includes mandatory checks to ensure all employees hold valid identity documents and the legal right to work in their respective locations. Additionally, our payroll governance mandates that all salaries are paid directly into a bank account in the employee's name (or a joint account they are a signatory of) to ensure wages are not diverted to unauthorised third parties. Consequently, we assess the risk of modern slavery and human trafficking within our direct workforce to be low.

### Indirect and contingent workforce

To access specialised technical expertise, we occasionally engage contingent workers and short-term contractors. While these primarily skilled workers make up a very small percentage of our total workforce, we partner with pre-screened agencies and service providers. Our standard practice is to seek alignment with our Supplier Code of Conduct. This includes the expectation that they pay their workers fairly according to local laws and ensure their operations are free from modern slavery. Due to the low-risk profile of these agencies, they were not identified for further investigation during our risk assessment in the reporting period.

## Training

Our training modules support employees to understand their roles in identifying and addressing modern slavery risks across the business.

### eLearning module

This course defines modern slavery, describes the impacts modern slavery has on an organisation, identifies ways to mitigate the risks and explains how to report on modern slavery. This module is mandatory for all permanent employees.

**99.7%**

employees completed modern slavery training

### Facilities team specialised training

We partnered with an external human rights consultancy to deliver tailored training specifically for our facilities team, recognising the distinct modern slavery risks associated with property management. This targeted session supports the team to identify and mitigate vulnerabilities within site operations and contracted services like cleaning and security.

**9**

attendees across three regions

### Supplier council specialised training

We conducted a targeted workshop for cross-functional leaders including those responsible for procurement decisions to uplift internal capability related to modern slavery risk.

**21**

attendees across three regions

# Grievance and remediation mechanisms

Iress maintains a whistleblowing policy (named Speaking Up) and procedure designed to facilitate the reporting of suspected wrongdoing, such as breaches of law, human rights abuses and other misconduct.

To ensure accessibility, the Company provides multiple reporting channels, allowing individuals to raise concerns directly with directors or select senior leaders, or to reach out to an external provider, YourCall, via telephone or written correspondence. The Speaking up policy is available on the Iress website under governance documents [here](#).

Every report raised is investigated appropriately, and in a timely manner to substantiate the allegations and determine the necessary next steps and consequences. Throughout this process, Iress places a strong emphasis on maintaining strict confidentiality and providing robust protections against any form of victimisation or retaliation.

Although no modern slavery reports were raised under the Speaking Up policy during the current reporting period, Iress acknowledges that an absence of reports does not inherently guarantee an absence of risk.

## Assessing the effectiveness of our actions

To ensure our approach to mitigating modern slavery risk remains robust and impactful, we continuously evaluate the effectiveness of our actions. We track our performance against targeted objectives across two core pillars: our role as an employer and our role as a purchaser. By actively monitoring these key metrics and reviewing our performance, we hold ourselves accountable, identify areas for continuous improvement and ensure that our operations and supply chain remain safe from exploitation.



### Our role as an employer

**Goal:** Maintain a healthy, fair, and inclusive workplace free from exploitation.

**Key Actions:** Enforce global verification checks, manage recruitment agencies clearly and advance inclusion and culture plans.

#### Performance:





## Our role as a purchaser

**Goal:** Integrate transparent supply chain policies to effectively mitigate risk, ensuring suppliers provide safe and fair workplaces.

**Key Actions:** Review internal controls, identify supply chain risks and consistently perform documented supplier screenings.

### Performance:

**Partially met**

new negotiated suppliers agreeing to Code of Conduct

**2**

on-site due diligence visits

**0**

whistleblowing complaints related to modern slavery

## Other activities

### Collaboration

Iress engages with industry associations to understand and share views on industry and policy matters, including on modern slavery. Through our membership of the Financial Services' Council (FSC) ESG Working Group and Sustainable Trading (UK) we stay abreast of reporting requirements, better practice, and peer insights on the management of modern slavery risks. This supports Iress with review and development of our approach and controls.

### Internal review

In 2025, we reviewed our procurement and contract management processes. While these reviews had a broader focus, they highlighted clear opportunities to enhance supplier governance and streamline our due diligence controls, which will further strengthen our supply chain risk management.

### Gap analysis

We are undertaking a gap analysis of our modern slavery risk management approach to ensure alignment with the UNGPs, relevant legislation and stakeholder expectations. This review will identify key opportunities for continuous improvement and culminate in a practical, phased roadmap.

## Looking forward

In the table below, we have outlined key initiatives included in our action plan for 2026.

Focus area	Details
<b>Supply chain visibility and controls</b>	Leverage our newly implemented third-party monitoring tool to begin mapping tier 2 suppliers within our highest-risk spend categories, specifically focusing on electronic equipment, promotional merchandise and Offshore professional services.
<b>Grievance effectiveness</b>	Conduct a review of the whistleblowing program to assess accessibility and awareness among indirect workers and third-party suppliers.
<b>Role-based training</b>	Roll out additional role-specific modern slavery training for teams managing offshore professional services and merchandise procurement.
<b>Policy review</b>	As part of our ongoing internal policy reviews, we are refining our Supplier Code of Conduct to more clearly outline our expectations regarding modern slavery.
<b>Contract execution summary</b>	Strengthen governance controls through a document outlining key commercial and ESG considerations for company delegates prior to sign-off.
<b>Supplier management review</b>	Implement opportunities for process and control improvement identified through a third-party review.

# Consultation and approval

This Statement for financial year 2025 is made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) and section 54 of the *Modern Slavery Act 2015* (UK) and constitutes Iress Group's Modern Slavery Statement. Iress Limited makes this statement on behalf of all reporting entities and wholly owned subsidiaries as outlined on page 2.

In preparing this joint statement, Iress actively engaged and consulted with the reporting entities and wholly-owned subsidiaries covered by this document. Because all Iress subsidiaries operate under a unified management structure and share identical ESG, procurement, and risk governance policies, enterprise-wide consultation was facilitated through the Executive Leadership Team, the Executive Risk Committee and the Supplier Council.

This statement was approved by the Board of Iress Limited in their capacity as the principal governing body on 23 April 2026.

Signed:



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**Andrew Russell**  
**Managing Director & CEO, Iress Limited**

23 April 2026

# Appendix A Coverage of the Australian and UK Modern Slavery Acts

Australian mandatory criteria	UK recommended reporting criteria	Reference in this statement
Section 16 (a) identify the reporting entity	Identify the reporting entity	About this statement
Section 16 (b) describe the structure, operations and supply chains of the reporting entity	Section 54 (a) Organisation's structure, its business and its supply chains	Our structure, operations and supply chain
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	Section 54 (d) 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	Modern slavery risks in our operations and supply chains
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	Section 54 (b)(c)(d)(f) 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	Modern slavery risks in our operations and supply chain  Actions taken to assess and address risks
Section 16 (e) describe how the reporting entity assesses the effectiveness of such actions	Section 54 (e) Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Assessing the effectiveness of our actions
Section 16 (f) describe the process of consultation with:  (i) any entities that the reporting entity owns or controls (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	n/a	Consultation and approval
Section 16 (g) include any other information that the reporting entity, or the entity giving the statement, considers relevant	n/a	Throughout this document

