

# Link Group Modern Slavery Statement

1 July 2019 to 30 June 2020



# Contents

<b>1. Purpose and scope</b>	<b>3</b>
<b>2. Business structure and our supply chain</b>	<b>3</b>
About Link Group	3
Operations and supply chain	4
<b>3. Governance of modern slavery risk management at Link Group</b>	<b>4</b>
Identifying and assessing risk	5
Risk management framework	5
<b>4. Identifying and managing modern slavery risk in Link Group's direct operations</b>	<b>5</b>
<b>5. Identifying and managing modern slavery risk in Link Group's supply chain</b>	<b>6</b>
Engagement with suppliers	6
Supplier due diligence process	6
<b>6. Modern slavery risk and COVID-19</b>	<b>7</b>
<b>7. Incident management and grievance mechanisms</b>	<b>7</b>
<b>8. Assessing effectiveness</b>	<b>7</b>
<b>9. Training</b>	<b>8</b>
<b>10. Consultation process</b>	<b>8</b>
<b>11. Continuous improvement</b>	<b>8</b>
<b>12. Board approvals</b>	<b>8</b>

## 1. Purpose and scope

- 1.1 This Modern Slavery Statement is prepared and issued by Link Administration Holdings Limited (Link Group) and its Controlled Entities for the purpose of reporting requirements for section 54 of the *UK Modern Slavery Act 2015* and also addresses the reporting requirements in section 16 of the *Australian Modern Slavery Act 2018 (Cth)* for the financial year ended 30 June 2020. It has been prepared as a joint statement. As Link Group reports across the whole company, the Controlled Entities covered by this Statement as at 30 June 2020 are those listed in the [2020 Link Group Annual Report](#).
- 1.2 This Statement discloses Link Group's progress towards identifying and addressing modern slavery risks within our business and supply chain since the last UK Modern Slavery Statement in 2019 and the effectiveness of the actions taken. This is Link Group's first Modern Slavery Statement under the Australian Act and our fourth Statement under the UK Act.
- 1.3 The previous reported UK Modern Slavery Statements can be found [here](#) for Link Group Administration Limited (formerly Link Market Services Limited), the only commercial organisation within Link Group that supplies goods and services in the UK with a total turnover of not less than £36M.
- 1.4 Link Group supports fundamental human rights as set out in the Universal Declaration of Human Rights and core International Labour Organisation conventions. In line with the UN Guiding Principles on Business and Human Rights, Link Group recognises and supports the responsibility of businesses to respect human rights.
- 1.5 Modern slavery is the severe exploitation of other people for personal or commercial gain and takes many forms. The most common are: human trafficking, forced labour, debt bondage/bonded labour, descent-based slavery, slavery of children, child labour and forced/early marriage.
- 1.6 Link Group is committed to implementing and monitoring ongoing practices which support human rights and address modern slavery risks in the business across all jurisdictions of operation. Link Group is also committed to continuously improving its processes and policies with respect to the identification and elimination of modern slavery.

## 2. Business structure and our supply chain

### About Link Group

- 2.1 Link Group is a global, digitally enabled business connecting millions of people with their assets – responsibly, securely and safely. From equities, pension and superannuation to investments, property and other financial assets, Link Group partners with thousands of financial market participants to deliver services, solutions and technology platforms that enhance the user experience and make scaled administration simple.
- 2.2 Link Group helps manage regulatory complexity, improve data management and provide the tools to connect people with their assets, leveraging analysis, insight and technology. Link Group's main operating business is not as an investment manager. It administers funds on behalf of clients but does not make investment decisions for clients.
- 2.3 Link Group is headquartered in Sydney, Australia and as at 30 June 2020 had over 6,500 employees operating across 18 jurisdictions globally. Link Group has operations in Australia, New Zealand, Philippines, Papua New Guinea, Hong Kong, India, United Arab Emirates, South Africa, Italy, the Netherlands, Germany, France, Ireland, Luxembourg and the United Kingdom.

## Operations and supply chain

- 2.4 Link Group takes the risk of modern slavery seriously. The business does not want to be complicit in enabling or perpetuating modern slavery and will continue to work with key stakeholders towards eliminating modern slavery. Across its supply chain and within its operations, Link Group aims to operate as a responsible and ethical business with respect for human rights.
- 2.5 The majority of the Link Group workforce is based in the UK, Ireland and Australia. The business typically relies on a highly skilled workforce in the regions it operates in. Further, Link Group does not own or manage any investments under its control that require inclusion.
- 2.6 Link Group uses suppliers who directly employ employees and use contractors. The majority of its supply chain is with contracted, preferred suppliers. This includes those related to information technology and the provision of professional services, which are its key suppliers. Other suppliers include those related to the provision of stationery, correspondence services, shipping, professional subscriptions, facilities services, travel, catering and marketing (branded and unbranded goods not for resale). These relationships are managed by contract owners and senior managers in Link Group and overseen by Finance and Risk & Compliance. For the purposes of this Statement, suppliers are classified into two tiers. Tier 1 suppliers are those who directly supply Link Group with goods and services and tier 2 suppliers are part of the indirect supply chain i.e. any organisation who supplies goods or services that contribute to the tier 1 suppliers.

### 3. Governance of modern slavery risk management at Link Group

- 3.1 Link Group has an established set of policies and procedures that govern the operations based on core business values. The policies and procedures relevant to how Link Group manages potential human rights related issues with regard to its employees, supply chain and business operations include but are not limited to:
- Anti-Bribery and Anti-Corruption Policy;
  - Code of Conduct and Ethics;
  - Discrimination and Equal Employment Opportunity (EEO) Policy;
  - Diversity and Inclusion Policy;
  - Fraud Prevention Policy;
  - Grievance Policy;
  - Human Rights Policy;
  - Risk Management Policy and Framework;
  - Sustainability Policy;
  - Vendor Management Policy; and
  - Whistleblowers Policy.
- 3.2 Link Group implemented a new Human Rights Policy in 2020 that strengthens its commitment to respecting human rights and outlines how the business aims to protect human rights and meet all related regulatory requirements in the jurisdictions of operation, including its modern slavery obligations.
- 3.3 Link Group encourages stakeholders such as suppliers and third parties who represent it to do business in an ethical manner and to share its commitments in supporting human rights, including the elimination of modern slavery in their organisations and supply chains.

## Identifying and assessing risk

- 3.4 Link Group has a dedicated CSR and Sustainability Manager who is responsible for co-ordinating the assessment and management of modern slavery risks and impacts in its business operations including its supply chain. This global role collaborates and consults with business representatives, Risk & Compliance, Sourcing, Legal and Human Resources and other key internal stakeholders to ensure a continual improvement and holistic approach to supply chain management, modern slavery risks and impacts to business operations.
- 3.5 As a financial services based organisation, the exposure to modern slavery risk is limited in that Link Group does not operate in or source employees from high-risk regions or engage in high-risk operations such as manufacturing. There is a possibility that the business may be exposed to modern slavery risk through its supply chains. In FY2020, Link Group conducted research to identify the key high risk areas for potential human rights risks within its supply chain. The key modern slavery risk areas for IT software and financial services businesses' supply chains include IT Procurement, shipping and logistics, travel, promotional marketing and building services including facilities management, utilities, cleaning, waste management and security.
- 3.6 As a result of this research, Link Group mapped its direct suppliers (tier 1) within the supply chain against the key modern slavery risk areas listed above to establish a baseline for identifying potential risk. As at 30 June 2020, the supply chain comprised over 2,500 direct suppliers across 18 jurisdictions globally. This was an initial scoping exercise to help Link Group identify and categorise suppliers and describe the potential risks of modern slavery practices. It has focused on addressing any risks in these areas and will report on progress annually.
- 3.7 Link Group requests tier 1 suppliers complete an annual questionnaire and uses the results to work collaboratively with these suppliers to identify factors in its operations and supply chain, any outsourced activities and their supply chains related to modern slavery risk. The questionnaire is designed to identify and assess risks that may be present, improve understanding of any tier 2 suppliers or presence of sub-contractors, improve transparency across shared supply chains and identify areas for further due diligence.

## Risk management framework

- 3.8 Link Group's risk management framework is aligned to international risk management guidelines (ISO 31000:2018) and provides a consistent approach for identifying, analysing, evaluating, treating, monitoring and reporting risks at all levels of the organisation.
- 3.9 Further details on the risk management framework can be found in the [2020 Link Group Annual Report](#) within the Directors' Report section, page 62-68.

## 4. Identifying and managing modern slavery risk in Link Group's direct operations

- 4.1 Link Group is committed to providing an environment that supports the health, safety and wellbeing of its people, customers, contractors and visitors and is free from discrimination, harassment and victimisation.
- 4.2 All employees are required to complete annual compulsory online compliance, which includes a module on the Code of Conduct and Ethics and Health & Safety. An online assessment must be passed to the required standard. The compliance training is an important component of reinforcing non-tolerance of unfair treatment, including discrimination and harassment. Link Group is committed to complying with all applicable laws and regulations, and committed to conducting business with the highest standards of ethics and integrity. The [Global Code of Conduct and Ethics Policy](#) sets out the standards of behaviour that are required of all employees. The Code is based on business purpose and core values.

- 4.3 Link Group has an internal recruitment team and the majority of the workforce is employed directly using that team. The business maintains relationships with recruitment agencies and will engage temporary workers during peak periods to complement the direct workforce. The recruitment agencies are vetted and contracted in accordance with our Contracts Policy and to date there have been no issues found regarding labour hire practices and/or no evidence of unanticipated payments to labour hire firms. Employee onboarding is tailored based on jurisdiction but includes police checks, contract execution, induction and training.
- 4.4 Link Group has developed appropriate COVID-19 plans in line with local health authority and guidelines in each jurisdiction to ensure a safe working environment for employees.
- 4.5 Link Group maintains high standards for human rights in its workplace to minimise the likelihood of modern slavery risk factors. Key activities to uphold human rights in the workplace include:
- Building an inclusive and diverse workplace that is free from discrimination, bullying and harassment, and that offers equal opportunity in career advancement;
  - Providing leave entitlements and other benefits enabling employees to enjoy the right to family, recreation and work-life balance; and
  - Focusing on employee health and safety through risk management and wellbeing initiatives.

## **5. Identifying and managing modern slavery risk in Link Group's supply chain**

- 5.1 In addition to those already mentioned above, Link Group has undertaken the following actions in FY2020 to further investigate modern slavery risk in its supply chain.
- 5.1.1 Link Group performed an analysis of its supply chain (tier 1) through an initial scoping exercise and as a result of that review, did not identify any significant concerns with its suppliers.

### **Engagement with suppliers**

- 5.1.2 Since FY2017, Link Group has sent out an annual supplier questionnaire to maintain continuous engagement with its largest material suppliers to understand how to better work together to identify factors in its operations (including its supply chain) relating to risk management including labour standards and supplier engagement. In FY2020, Link Group developed a modern slavery review/assessment that has been incorporated into its FY2021 annual supplier questionnaire that will be sent to suppliers categorised as operating in key modern slavery risk areas outlined in section 3.5.
- 5.1.3 In FY2020, Link Group has developed a set of expectations, known as "Standards for Suppliers", which set out what it expects from its suppliers with regards to their sustainability practices and the management of their business operations and supply chains. Link Group encourages suppliers to conduct business in an ethical manner and to share Link Group's commitments in supporting human rights, and in eliminating modern slavery in their organisation and supply chains.

### **Supplier due diligence process**

- 5.2 Link Group has a due diligence process which includes pre-screening of suppliers followed by an onboarding process. Supplier selection and onboarding is performed in accordance with the Contract and Vendor Management policies. The process includes IT security reviews, privacy reviews and materiality assessments.
- 5.3 The business conducts regular due diligence process reviews to identify any areas of improvement for supplier management. In FY2020, a review highlighted the need to

strengthen the pre-screening process to allow for the identification of any material risks, including those specific to slavery and human trafficking, associated with a supplier prior to onboarding. The pre-screening process will be strengthened to address this finding.

## **6. Modern slavery risk and COVID-19**

- 6.1 Modern slavery risks are never static, and FY2020 has been an unprecedented year for people and businesses globally as the COVID-19 pandemic impacted everyone from a health, social and economic perspective.
- 6.2 The safety and wellbeing of employees across all businesses and locations was, and remains, the key priority. Link Group is proud of how its team has responded to this crisis by maintaining service levels for clients, while mobilising to enable the majority of its people to work remotely during COVID-19.
- 6.3 Teams across the business collaborated to deliver the technology required to accommodate new ways of working, and adjust and adapt business operations to provide continued service for our clients. In parallel, Link Group put in place communications and wellbeing initiatives to ensure the health and safety of employees.
- 6.4 Whilst the pandemic placed pressure on global supply chains in the form of factory shutdowns, order cancellations, workforce reductions and sudden changes to supply chain structures, Link Group has not found its supply chain to be materially impacted.

## **7. Incident management and grievance mechanisms**

- 7.1 Link Group's Speak Up! framework outlines multiple ways for an employee to raise a concern – from a failed internal process, suspected misrepresentation, discrimination, harassment or bullying, through to customer complaints, illegal misconduct or concerns about modern slavery risk in its direct business or in its supply chain.
- 7.2 Link Group has several policies which underpin the Speak Up! framework. These policies include:
  - Code of Conduct and Ethics;
  - Grievance Policy;
  - Fraud Prevention Policy;
  - Incident Management Policy;
  - Complaints Management Policy; and
  - Whistleblower Policy.
- 7.3 Every Link Group employee is required to report and escalate incidents in a timely manner and in accordance with the appropriate local incident management procedure. The person reporting the incident must complete the initial incident severity rating. Risk Management will review and may amend the rating as required in accordance with the severity rating guidelines in the Incident Management Procedure.
- 7.4 It is everyone's responsibility to model the Link Group core values and ensure that the ways of working are collaborative, ethical and fair. Employees are encouraged to speak to their manager in the first instance, or if they prefer, they can speak to a member of the Risk and Compliance team or their HR representative.

## **8. Assessing effectiveness**

- 8.1 Link Group assesses the effectiveness of its actions through the governance review process of policies and frameworks that address modern slavery, the risk management framework and incident reporting and remediation processes.

8.2 Link Group's Risk & Compliance and Human Resources & Brand divisions are responsible for maintaining records of the number and severity of breach reports and for monitoring the Global Human Rights Policy's effectiveness. They will report periodically to the Executive Leadership Team (ELT) and Audit Committee. A periodic report will be provided to the Board on the Policy's effectiveness, major breaches if any, and remedial actions undertaken.

## 9. Training

9.1 Link Group is in the process of broadening its compliance training to include specific modern slavery awareness training for key employees as part of its annual global compliance training.

9.2 In the UK, management and supply chain leadership awareness has been raised through the implementation of the now superseded Prevention of Modern Slavery Policy and associated divisional attestation process. Link Group continually evaluates employee awareness and required training as part of the implementation of its Procurement Policy and Standards.

## 10. Consultation process

10.1 This Modern Slavery Statement is made on behalf of Link Group and its subsidiaries (as listed in the annual report). In preparing this Statement, the Link Group ELT who represent relevant directors and officers of all the entities making this Statement were consulted and provided with an opportunity to review the Statement prior to its approval.

## 11. Continuous improvement

11.1 Link Group regularly reviews current processes and policies to identify any gaps and ensure continuous improvement year on year. Enhancements for FY2021 include:

- Incorporating the "Standards for Suppliers" into key supplier contracts to more specifically address modern slavery and human rights requirements;
- Incorporating a consistent modern slavery review/assessment into its annual supplier questionnaire;
- Strengthening the supplier governance program through a global alignment of supplier management and materiality assessments for completion by the end of 2021. This will include a consistent supplier management approach globally and continued due diligence activities on suppliers, both new and existing;
- Educating employees on Link Group's commitment to respecting human rights through the Human Rights Policy which came into force in August 2020 and through the inclusion of modern slavery awareness training for key employees launched in November 2020; and
- Review the effectiveness of the initial scoping exercise for identifying potential risk in the supply chain to ensure continual improvement.

## 12. Board approvals

12.1 This Statement has been approved by the Board of Link Administration Holdings Limited on behalf of Link Group including all Controlled Entities.

Michael Carapiet Independent Chairman and Non-Executive Director

Date: 24 February 2021

Signature:



Vivek Bhatia CEO and Managing Director

Date: 24 February 2021

Signature:

