Modern Slavery Statement

COVERING THE PERIOD OF 01 JANUARY TO 31 DECEMBER 2022
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Introduction
About This Statement

The Australian Border Force requires organisations with annual revenue greater than $100M globally to comply with the requirements of the Australian Modern Slavery Act 2018. ISG has prepared the third Modern Slavery Statement which covers the company's activities during the financial year, ending 31 December 2022.

ISG takes very seriously our responsibility to ensure that neither our operations nor our supply chain participate in any form of human exploitation anywhere in the world.

Unfortunately, the latest global estimates of Modern Slavery (2022) from Walk Free, the International Labour Organisation and the International Organisation for Migration suggest that the number of people exposed to Modern Slavery continues to increase globally from 40.3M in 2016 to 49.6M people in 2022, an increase of 23%.

ISG is committed to the fight against Modern Slavery and its eradication and will continue to make every effort to respect human rights throughout our business and conduct our operations responsibly and ethically.

This statement is made pursuant to section 13 (1) of Modern Slavery Act (Commonwealth) 2018 and has been approved by the ISG's Internal Executive Board.

In approving this statement, the ISG Board has satisfied itself that adequate due diligence has taken place to identify, manage and mitigate any risks of human exploitation anywhere in ISG's operations and supply chain.

Michael P. Connors
Chairman & Chief Executive Officer

[Signature]
Structure, Operations and Supply Chain
About ISG

- ISG pioneered the sourcing advisory industry in 1989 as TPI, ISG’s flagship entity.
- ISG merged its three go-to-market entities in 2012 to create one globally integrated business with one company brand.
- A series of strategic acquisitions and internal growth has made ISG the powerhouse it is today.
- ISG continues to expand its value, capabilities and offerings to help enterprises in their pursuit of operational excellence.

Acquisitions

- **2007**
  - **Founded 2006**
  - **Compass**
    - The world’s leading firm for sourcing and business operations data and advisory.

- **2009**
  - **Founded 1980**
  - **STA**
    - A premier independent provider of business and IT benchmarking, performance improvement, data and analytics services.

- **2011**
  - **Founded 1997**
  - **ccconsulting**
    - A premier independent technology advisory serving the public sector.

- **2012**
  - **Combined 2012**
    - Merged to create one powerful, global ISG Brand.

- **2014**
  - **Founded 2011**
  - **Satisfaction**
    - Satisfaction benchmarking for information technology advisory services to clients and service providers.

- **2015**
  - **Founded 2011**
  - **Next-generation**
    - A leader in providing information technology advisory services to the Italian public sector.

- **2016**
  - **Founded 2014**
  - **A subscription-based research, advisory and benchmarking firm.**

- **2016**
  - **Founded 2014**
  - **An industry-leading organisational change management (OCM) consulting firm.**

- **2016**
  - **Founded 2013**
  - **A global sourcing, automation and transformation advisory firm.**

- **2016**
  - **Founded 2014**
  - **Automated contracting solutions**

- **2016**
  - **Founded 2015**
  - **Specialist in transformational change for enterprises**

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ISG Global Leadership

Board of Directors
Neil G. Budnick, Gerald S. Hobbs (Lead Director), Bruce N. Pfau, Christine Putur, Kalpana Raina, and Donald C. Waite III

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Chairman & CEO

Humberto Alfonso
EVP and Chief Financial Officer

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Chief Strategy Officer and Partner, Americas Consulting

Lyonel Rouast
Partner and President ISG South Europe, Middle East and Africa

Kathy Rudy
Partner and Chief Data and Analytics Officer

Dieter Thompson
President, ISG Network & Software Advisory
ISG Operations

- ISG’s workforce consists mostly of remote staff, operating from various locations to serve our clients globally.
- In addition to the remote workforce, ISG also has offices in key locations around the world.
- ISG employs approximately 1,600 people globally and our operations are supported by staff, based in offshore locations, such as India, which provide services to our clients as well as business, compliance and administrative support services to our global team.
As part of conducting business, ISG relies on a supply chain within Information Technology, Finance, Events and Marketing, Facilities, HR as well as other consulting companies around the world.

In our operational centres, we interact with suppliers at both a global and local level. Some services are derived from global suppliers and distributed across our international workforce, but many others are smaller, local suppliers.

**What we Buy**

- Facilities Management
- Software
- Human Resource
- Security
- Financial Services
- Event Management
- IT Services
Risk of Modern Slavery in Our Operations and Supply Chain
Potential Risks in Our Operations

1. ISG continuously monitors its operations, involving and consulting all business units within its structure, to ensure that any potential risk of human exploitation is identified and appropriately managed.

2. ISG has implemented a Modern Slavery Risk Management Framework, as part of our global Enterprise Risk Management Framework, to ensure that all global entities, employees and contractors have sufficient visibility and a clear understanding of their responsibilities in identifying and mitigating any risks of human exploitation within ISG’s operations and supply chain.

3. ISG has continued to strengthen our policies, including employment-related policies and processes, to ensure individuals do not unintentionally engage in any practices which may contribute to Modern Slavery in any form.

4. ISG has continued to expand its Modern Slavery awareness training for employees and contractors which includes identifying signs of Modern Slavery, what to do if Modern Slavery is suspected and how best to avoid Modern Slavery in ISG’s operations and supply chain.
ISG acknowledges that we, as a global organisation, have a wide-ranging supply chain which may expose us to potential risk of Modern Slavery. As such, ISG has continued to monitor its global supply chain to identify, assess and mitigate any potential risks.

As most companies around the world, ISG consumes electronic goods such as laptops, mobile phones and other equipment as part of carrying out our business as an advisory, technology and research organisation. ISG is acutely aware of the intrinsic risks, associated with the production of electronic goods in high-risk countries and as such, ISG is collaborating with its peers and suppliers to encourage the elimination of any risks of human exploitation in the manufacturing and distribution of the electronic goods, consumed by ISG.

As an organiser of global events, ISG is also aware that potential risk may exist in certain food and hospitality industries and ISG is continuously monitoring its catering and hospitality supply chain to ensure that any potential risk is identified and mitigated if needed.

Over the past two years and in line with the Modern Slavery Act, ISG has significantly improved its ongoing management of suppliers throughout the supplier lifecycle.

ISG’s Modern Slavery Framework is underpinned by our Supplier Code of Conduct which outlines the policies that govern the processes, pertaining to supplier engagement and the minimum requirements and prohibitions with respect to the purchasing of goods and services on behalf of ISG. Thus, ISG contracts with suppliers include the obligation to comply with the ISG Supplier Code of Conduct.
Actions Taken to Assess and Address Modern Slavery Risks
ISG’s **Modern Slavery Risk Management Framework**, a subset of ISG’s **Enterprise Risk Management Framework**, forms the backbone of our commitment to the eradication of business-related human exploitation.

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**1.** As per the Modern Slavery Act requirements, the ISG Modern Slavery statement must be approved by the Internal ISG Executive Board (IEB).

**2.** Before the Modern Slavery Statement is approved, the IEB must satisfy itself that adequate due diligence has taken place to identify, manage and mitigate any risks of human exploitation anywhere in ISG’s operations and supply chain.

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The IEB is accountable for ISG ANZ’s compliance with Modern Slavery Act 2018. The IEB signs off on ISG ANZ’s Modern Slavery Statements.
Operationalisation of ISG Modern Slavery Framework

Over the past three years, ISG has operationalised our Modern Slavery Framework and continued to build a positive risk culture which emphasises zero-tolerance for human exploitation in our operations and supply chain.

2020
- Communication
- Training
- Process review
- Stakeholder Engagement

2021/2022
- Reward risk aware behaviors
- Embed processes
- Develop metrics

2023 and beyond
- Continuous improvement – refine processes, additional training and communication.
- Report on metrics
Operationalisation of ISG Modern Slavery Framework

The cornerstones of our Modern Slavery Risk Management Framework are:

**Risk Appetite**
- The cornerstone for any effective risk appetite framework involves the development of a risk appetite statement.
- At its most fundamental level, risk appetite is the level of exposure an organisation is willing to take in pursuit of strategic objectives.
- In ISG’s case, the Risk Appetite is “Low” which means that ISG has zero appetite for any human exploitation within its operations or supply chain.

**Policy Framework**
- ISG undertakes regular reviews of its policies to ensure that policies remain adequate and relevant globally.
- As part of our continuous improvement approach, we have reassessed the maturity of our policies and frameworks, systems and controls and remediation mechanisms.
- The Supplier Code of Conduct sets out the expected behaviors of ISG’s suppliers, not just in terms of compliance to the Modern Slavery Act but also in relation to how ISG expects its suppliers to conduct themselves and treat their suppliers.
- ISG employees, contractors and suppliers can report any suspected Modern Slavery concerns to a Whistle-blower email address.

**Governance**
- ISG has put in place a Modern Slavery Risk Management Framework which clearly identifies key stakeholders responsible for due diligence at supplier onboarding as well as on-going management and monitoring of ISG’s supply chain.
- The framework also identifies internal and external reporting requirements, including frequency, content and audience.
- The Modern Slavery Framework aligns to ISG’s Enterprise Risk Management Framework.
The United Nations and the Walk Free Foundation estimate that there are approximately 49.6M victims of Modern Slavery around the world.

ISG believes that our clients want us to be a leader in the eradication of human exploitation globally. Hence, ISG has implemented a strong internal framework to ensure we are not linked, nor contribute to any Modern Slavery risks.

ISG has also developed a professional service which helps our clients identify, assess, manage and mitigate any Modern Slavery risks in their operations and supply chain.

Risk culture is the “set of encouraged and acceptable behaviours, discussions, decisions and attitudes toward taking and managing risk within an organisation.”

As part of the Modern Slavery obligations, ISG has undertaken a commitment to build a positive risk culture where employees at every level appropriately manage risk as an intrinsic part of their day-to-day work. ISG believes that a positive risk culture supports an open discussion about uncertainties and opportunities, encourages everyone to express concerns, and maintains processes to elevate concerns to appropriate levels.

This is particularly important when expressing concerns in relation to unethical behaviours, including Modern Slavery.

ISG believes that Modern Slavery and any other Third-Party Risk Management should be enabled by technology. Hence, ISG has invested in a Third-Party Risk Management technology which allows ISG to identify, assess, manage, mitigate and report on any Modern Slavery risks in our operations and supply chain.

ISG uses the latest in automation, including auto-scoring of risks, to efficiently and effectively manage any potential risks.

The cornerstones of our Modern Slavery Risk Management Framework are:
ISG’s Approach to Modern Slavery Risk Identification

As part of ISG’s Modern Slavery Risk Management Framework, we have developed a robust and repeatable process to **identify, assess, manage and continuously monitor** for any signs of Modern Slavery risks in ISG’s operations and supply chain. ISG uses the latest technology, including AI and automation to ensure consistency and efficiency in its identification of risk.

ISG’s Third-Party Risk Management team consists of qualified risk professionals who apply industry best practice to the Modern Slavery risk identification process.

<table>
<thead>
<tr>
<th>Identify</th>
<th>Who are ISG’s suppliers? Collate all available information:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Criticality  • Industry  • Geography</td>
</tr>
<tr>
<td>Assess</td>
<td>Assess the risk posture for suppliers, taking into consideration assessment responses and any available secondary sources.</td>
</tr>
<tr>
<td>Manage</td>
<td>Manage any issues through to completion, working with the relevant business owners.</td>
</tr>
<tr>
<td>Monitor</td>
<td>Continue to monitor for changes to suppliers’ risk posture. Use internal information (e.g., changes to scope or criticality) and external sources (e.g., adverse news, alerts and sanctions).</td>
</tr>
</tbody>
</table>
We continue to engage in best practice due diligence of suppliers. However, we recognise the challenges our suppliers face when working to comply with our Supplier Code of Conduct. This is particularly relevant to small, local suppliers, and we continue to work closely with all suppliers to ensure their obligations under the Modern Slavery Act are met. We prioritise mechanisms which drive continuous improvement and are committed to working with our suppliers to remedy identified issues and put systems in place to prevent issues in the future.

### ISG’s supplier due diligence process, summarised below.

<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
<th>Details</th>
</tr>
</thead>
</table>
| 1 | All new suppliers | - Suppliers must agree to adhere to the Supplier Code of Conduct, which includes ISG's minimum modern slavery standards, before engagement can commence.  
- Suppliers must agree to the inclusion of a modern slavery provisions in the contractual agreement. |
| 2 | Suppliers with a medium or high inherent modern slavery risk | - Suppliers are required to complete a Modern Slavery Supplier Assessment during the onboarding process, designed to identify any potential risk of human exploitation.  
- ISG makes use of secondary sources of information such as Code of Conduct, Ethical Sourcing, Whistle-blower Policies etc., responses to Human Exploitation legislation overseas, news and alerts including adverse media, and any other information which may be used in risk mitigation. |
| 3 | Suppliers with a high residual modern slavery risk | - Suppliers are required to complete a Modern Slavery Assessment on regular basis, dependent on risk.  
- ISG makes use of external data such as events and adverse news to continuously monitor its supply chain. |
| 4 | Ongoing Modern Slavery Controls Assurance | - Suppliers may be required to undergo audits for ISG to obtain assurance that adequate controls are in place to mitigate modern slavery risks appropriately.  
- ISG’s audits may be in the form of physical audits (site visits) or virtual audits (interviews, evidence gathering etc.). |
Key Performance Indicators (KPIs)

During this reporting period, we have continued to build on our robust due diligence system with enhanced controls. We have set out below, the key activities that enable us to assess the effectiveness of our modern slavery approach.

**Internal training**
ISG has had Modern Slavery training in place for more than two years. All new employees and contractors must undertake the Modern Slavery training, provided by an external expert supplier, as part of the onboarding process. Existing employees and contractors undertake annual Modern Slavery training. During the reporting period, ISG is proud to report 100% training compliance for its Australia-based staff.

**Policy development and implementation**
As part of the continuous strive for improvement, ISG has reviewed all existing policies during the reporting period to ensure compliance with the Modern Slavery Act.

**Supplier Due Diligence**
ISG has continued to enhance our supplier due diligence process during the reporting period to identify areas for improvement while working closely with our various business to ensure all ISG’s suppliers are assessed and that any potential risks identified are managed accordingly.

**Modification of supplier contracts**
ISG has continued to update supplier contracts with Modern Slavery specific clauses, including a requirement for suppliers to comply with ISG’s [Supplier Code of Conduct](#).

**Supplier survey response rate**
ISG has continued evolve its Risk Assessment Matrix which categorises our suppliers into High, Medium, and Low risk, based on industry, geography, and other key risk indicators. The supplier response rate in 2022 has improved by 5% to 69% for this reporting period.

**Reported incidents, and corrective actions**
There were no incidents reported during the 2022 reporting period.
During the reporting period, ISG has taken several important steps to improve our approach to Modern Slavery practices in our operations and supply chain. We have aligned our Modern Slavery Risk Management Framework, implemented in 2020, to ISG's Enterprise Risk Management Framework.

**Actions taken during the Reporting Period**

- **Continued to stress the importance of ISG's Modern Slavery Risk Management Framework** to employees and contractors.
- **Conducted a full review of ISG's policies**, including the Code of Ethics and Business Conduct, Whistle-blower and Supplier Code of Conduct policies, to ensure continued compliance with the Modern Slavery Act.
- **Sent Modern Slavery assessments** to suppliers to identify any potential risk in ISG’s global supply chain.
- **Enhanced ISG's Supplier Due Diligence process** by working closely with internal stakeholders to leverage existing supplier information collection processes, such as the Data Protection Impact Assessment, to minimise the impact on our suppliers.
- **Continued to roll out Modern Slavery specific clauses** in ISG's standard contract templates, including a requirement for suppliers to comply with ISG’s Supplier Code of Conduct.
- **ISG conducted a site audit**, involving a high-risk supplier (please see Case Study on page 26) to seek assurance that no slavery kind of practices were present.
- **Assessed and reported on Modern Slavery Assessment results**, actions and issues to the ISG Internal Executive Board for review and sign off as part of the Modern Slavery Statement requirements.
Operational Due Diligence and Supplier Agreements

Operational Due Diligence

- Modern slavery risks in our operations are managed by our existing strong policy environment for workplace relations. ISG maintains a zero-tolerance approach to modern slavery practices which is supported by our robust governance structure.
- All employees are afforded working entitlements in line with legislation. Direct employees are subject to a thorough onboarding process that includes confirmation of their visa status by checking the copies of the documents (passports, visas). All new employees must complete a policy affirmation which includes a confirmation to abide by the ISG Code of Ethics and Business Conduct.
- We continue to work with our offshore operations to strengthen the modern slavery control environment in any high-risk offshore location to enhance the due diligence of our operations as a key focus area. We will work alongside our colleagues in these locations to further drive improvements.

Supplier Due Diligence

- In FY20, we integrated modern slavery provisions into our supplier Standard Agreement templates. The provisions set out ISG’s expectations, including our minimum modern slavery standards, and provides ISG a right to audit our suppliers, their operations and supply chain.
- ISG continues to enhance the due diligence process of its suppliers and the wider supply chain through periodic Modern Slavery assessments, impact and location assessments and Due Diligence Deep Dives to ensure that any Modern Slavery risks are identified and subsequently mitigated.
- Our approach to Modern Slavery is guided by industry best practice in our procurement function, monitoring of our supply chain, and ongoing conversations with modern slavery subject matter experts, to assess changes to modern slavery risks in our business and supply chain and provide relevant actions to mitigate emerging risks. At on-boarding, all suppliers undergo adverse media screening, including for modern slavery and human rights violation indicators.
Due Diligence Deep Dive into our Supply chain

In 2021, we performed a due diligence deep dive for a major supplier of technology products to ISG. During this process, we learnt that the supplier is linked to Forced Labour in China, one of the High-Risk countries as per the Global Slavery Index. While this deep dive is only concerned with one major technology supplier, ISG is aware of other global suppliers, engaging in a similar operational structure, in China.

ISG consumes products and services from a technology company which is connected to the use of Uyghur forced labour through their manufacturing and supply chain.

### Details:
In October 2021, Reuters reported that a very well-known technology company is linked, through their supply chain, to the forced labour of Uyghur and other ethnic minorities in the Xinjiang region in China. Reportedly, the supplier has arranged for hundreds of Uyghur workers to be transported to its plant in the southern Chinese city of Qinzhou. The company supplies equipment and software to companies and end users globally.

### Analysis:
While the process can be complex and resource intensive, the allegations concerning the company highlight that in order to address modern slavery risks in a meaningful manner requires an extensive mapping of the extended supply chain. According to the supplier's Modern Slavery statement, the company in question is taking steps to address deeper supply chain risks, such as:

- Requesting information from high-risk suppliers on how they are managing risks in their supply chains.
- Providing Modern Slavery training to key suppliers within their supply chain.
- Sharing knowledge and best practice through industry associations.

### Conclusion:
In August 2022, Reuters again reported that U.N. experts stated that it is "reasonable to conclude" that forced labour of members of minority groups has taken place in China's western Xinjiang region.
Continued to provide Modern Slavery training for employees and contractors globally, including refresher training.

Continued to embed Modern Slavery Risk Management processes in ISG’s operations such as Finance, HR and IT.

ISG held thought leadership sessions in major Australian cities on the identification and mitigation of Modern Slavery in Supply Chains to numerous executives across various industries.

Educational session for ISG India employees was conducted in association with International Justice Mission.

In the current reporting period, ISG focused on why identification of Modern Slavery risks is important to ISG:

- Important to protect our workforce, direct and indirect, from any form of modern slavery (debt bondage, forced labour etc.)
- ISG is required by law to report upon slavery in our organisation and supply chains.
- Addressing modern slavery in our supply chains also improves the quality and integrity of our supply chain.
- Taking a leadership role in fight against modern slavery is critical to our credibility among clients, investors and the general public.
Case Study
Update/Working with our Suppliers

ISG relies on a local supplier to supply security as well as housekeeping staff for our Bangalore Offshore Operations Centre.

The Walk Free Foundation’s Global Slavery Index considers India a High-risk country due to the relatively high occurrence of Modern Slavery. An estimated 8M people in India are subject to some form of human exploitation.

When assessing the potential risk of Modern Slavery in this case, ISG considered the fact that workers employed as housekeeping staff are often unskilled and may have migrated to Bangalore in search for work, leaving them potentially vulnerable to exploitation. This potential issue has been further exacerbated by the pandemic and the temporary closure of ISG’s Bangalore office.

Despite shortcomings in the supplier’s policies, ISG did not find any evidence of Modern Slavery within the supplier’s operations during our on-site investigation. However, ISG will continue to work with the supplier to ensure there are no risks of human exploitation within the supplier’s labour hire practices and onboarding processes.

- ISG sent initial Modern Slavery Risk Assessment to supplier.
- ISG identified that supplier had no Modern Slavery policy or Code of Conduct in place.
- The supplier had no Whistle-blower mechanism in place to raise any concerns.
- ISG categorised the supplier as a High-Risk supplier as the housekeeping industry is widely known for vulnerability to modern slavery practices due to the primarily low skilled nature of the work and the known controversies of underpayment and poor treatment of workers.
- ISG sent the assessment to the supplier in this reporting period for reassessment.
- During the reporting period ISG has conducted a site audit at the supplier location and found out that although the supplier does not have a Modern Slavery Statement or policy, they are compliant with local state (Karnataka) legislations:
  - Employee’s Provident Fund and Miscellaneous Provisions Act 1952
  - The Employee’s State Insurance Act 1948
  - Karnataka Shops & Commercial Establishment Act 1961
  - The Minimum Wages Act 1948
  - The Child and Adolescent Labour (Prohibition and Regulation) of Karnataka Rules, 1998
- ISG will continue to assess the supplier’s adherence to the Modern Slavery Act through close collaboration and guidance.
As a not-for-profit organisation, IJM raises funds in support of protection programs to combat human trafficking and provides subject matter expertise for successful and sustainable solutions towards building a safe and self-reliant society.

In September 2022, IJM conducted a session, citing examples of local human exploitation, for all ISG India-based employees to increase awareness of local child and forced labour.

ISG as a Supporter to the Community

ISG has initiated a global partnership with International Justice Mission (IJM), an international, non-governmental organisation, focused on human rights, law and law enforcement.

IJM works to combat sex trafficking, child sexual exploitation, cybersex trafficking, forced labour, property grabbing, and police abuse of power, and addresses citizenship rights of minorities around the world.
Effectiveness of Actions Taken
Assessment and Effectiveness of Our Actions

ISG’s Commitment

- ISG supports the United Nations Guiding Principles as the global standard for preventing and addressing business-related human rights harm. ISG also understands and accepts its responsibility to help eradicate human exploitation and respect human rights wherever we operate around the world.

- ISG’s commitment to conducting business ethically and legally is the foundation for the company’s global culture. This commitment is manifested through ISG’s responsible business and legal compliance program. Our approach is based on a framework to ensure we meet our legal obligations and human rights commitments wherever we operate. This framework includes the visible support of our senior leadership, regular risk assessments, written standards and controls, ongoing training and communications, and auditing, monitoring, and response procedures. We have zero tolerance for violations of applicable laws anywhere in the world.

ISG’s Actions

- During this reporting period, ISG’s focus has been on reinforcing the foundation of the structure which underpins ISG’s commitment to the UN Guiding Principles and the Modern Slavery Act:
  - Reviewed ISG’s Modern Slavery Risk Management Framework, including policies, processes and procedures to ensure the framework continues to be relevant to the eradication of human exploitation globally.
  - Conducted a comprehensive review of ISG’s operations and supply chain.
  - Sent out Modern Slavery questionnaires to ISG's suppliers, assessed responses and raised issues where appropriate.
  - Continued to update contractual commitments to include Modern Slavery provisions throughout ISG supply chain.
Assessment and Effectiveness of Our Actions (continued)

ISG’s Acknowledgement and Actions

1. ISG understands and acknowledges that Modern Slavery risks can arise in relation to the goods and services we procure or the regions in which we operate. We understand that risks may relate to the country of origin, the industry or the business practices of entities within our supply chain.

2. During the 2022 reporting period, ISG has further enhanced its supplier onboarding due diligence process and improved the process to include financial risks including Anti Money Laundering, Counter Terrorism Financing, Corruption and Bribery, Regulatory Compliance as well as non-financial risks such as adverse media, lawsuits globally, Politically Exposed Persons (PEPs), sanctions as well as any connection to Modern Slavery practices anywhere in the world. Based on this comprehensive assessment, we continue to categorise our suppliers into three categories: High, Medium and Low. We have enhanced our Modern slavery questionnaire to capture high risk suppliers upfront to reduce the efforts of low-risk supplier, using conditional questions as part of our digital supplier assessment platform.

3. When assessing any potential Modern Slavery risks, we use reputable and credible sources such as the Australian Department of Foreign Affairs and Trade’s Terror List, verified adverse news globally, Walk Free Foundation’s Global Slavery Index and Dow Jones Factiva.

4. The use of credible secondary sources to compliment supplier assessments has enabled ISG to focus on High-Risk suppliers to mitigate any risk found to be outside ISG’s risk appetite.

5. While our review did identify some suppliers as presenting a high inherent risk due to lack of controls in place, such as documentation, their operating location or industry, ISG has found that the risk could be mitigated to an acceptable level by working closely with relevant suppliers, e.g., ensuring that suppliers are aware of their obligations under the Modern Slavery Act.

6. As a principles-based law, the Modern Slavery Act requires entities to demonstrate continuous improvement over time. We believe that our assessment of Modern Slavery risks in our operations and supply chain, as outlined in this third statement, has been rigorous, comprehensive, and effective.
Grievance and Remediation

ISG has zero tolerance for retaliation of any kind. The Whistleblower Policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns. As set out in our Whistleblower Procedures (which we have made publicly available to increase transparency), we offer our people many ways to raise a concern through our leaders, people managers as well as anyone in Human Resources or Legal and sent to the committee helpline at whistleblower@isg-one.com.

Likewise, ISG’s suppliers have access to a confidential, independent and safe way to report concerns or misconduct directly and confidentially as part of the extension of the ISG’s Whistleblower policy. It offers an avenue for reporting concerns about the business or an individual’s behavior, including suspicion of violations of ISG’s policies and procedures, or more broadly, human rights, safety, environmental, financial reporting, fraud or business integrity issues. If there is any doubt whether a course of action is lawful, suppliers should consult with their own internal contact and/or a legal representative.

We take all concerns raised very seriously, including allegations of retaliation. We investigate 100% of concerns reported and seek to confirm the facts in a professional, methodical, thoughtful and balanced manner. Once we get to the facts, we determine appropriate outcomes and endeavour to apply them fairly and consistently on a global basis – regardless of seniority, position or contribution to ISG.

Whether internal or external, we treat all concerns seriously and in strict confidence. We protect anyone who raises, in good faith, a concern about a human rights issue or who assists us, or a law enforcement authority, by providing information to address such a concern.

We encourage our people, suppliers and subcontractors to raise ethical and legal concerns, including potential human rights issues, and we provide a range of secure channels for them to do so confidentially, and anonymously.

To date, we have not received, through the committee helpline or otherwise, any complaints raising concerns about Modern Slavery in our operations or supply chain.
Future Commitments
## 2021 Commitments

- Continue to invest in ISG’s internal risk management capability by training of staff, overseen by a specialized Third-Party Risk Management Centre of Excellence team.
- Contribute open-access knowledge through webinars and speaking events on Modern Slavery and its impacts.
- Provide pro-bono advice to the not-for-profit industry.
- Continue to deliver impactful work in helping our clients identify and manage modern slavery risks.
- Review existing policies to identify opportunities to strengthen our commitment to eradicate business-related human exploitation by 2030.
- Incorporate ISG’s commitment to the eradication of Modern Slavery into our wider ESG commitments and policy.
- Improve the metrics which will enable us to evaluate the progress we are making with respect to addressing modern slavery and human trafficking in our operations and supply chain.
- The results of the diagnostic assessment we have undertaken will support our efforts to refine our approach to enhancing our modern slavery due diligence. We intend to:
  - Streamline our processes to assess any suppliers that historically may have been considered outside the remit of the Modern Slavery Act.
  - ISG’s Third Party Risk Management Centre of Excellence will lead the review of our Supply Chain Services policies and process (including a review of our Supplier Code of Conduct) to confirm if any improvements can be made in terms of supporting human rights and anti-modern slavery.
  - Carry out in-depth assessment of selected high-risk suppliers based on spend, industry and geography to assess suppliers’ standards, policies and programs relating to human rights and modern slavery issues.

## 2022 Updates

- Expanded supplier onboarding due diligence process to ensure continued compliance with the Modern Slavery Act.
- Reviewed all relevant policies to ensure continued compliance with the Modern Slavery Act.
- Continued to roll out Modern Slavery specific clauses in ISG’s contracts, including a requirement for suppliers to comply with ISG’s Supplier Code of Conduct.
- Continued to work with suppliers to ensure that the risks of human exploitation are understood and detected in their supply chains.
- Collaborated with NGOs to reduce and disrupt modern slavery.
- Reviewed and refreshed our training program to ensure continued relevance to our employees and contractors.
- Continue to deepen our due diligence beyond our direct Suppliers. Please refer “Deep Dive into our Supply chain” slide for more details.
- Ensure all Modern Slavery risk assessments are reviewed by ISG’s Third-party Risk Management Centre of Excellence team (TPRM CoE) to ensure all potential risks are captured and addressed appropriately.
- Review of ISG’s policies are conducted with input from ISG Legal, HR and the TPRM CoE.
Looking to the Future

Our Modern Slavery Program is part of our ongoing commitment to overcoming Environmental, Social and Governance issues. We believe that awareness and communication of risk factors form part of effectively managing modern slavery risks across our operations and supply chain. We consider the following priority items to underpin our future endeavors in this important area.

Enhance our risk management capability

- Continue to invest in ISG’s internal risk management capability by training of staff, overseen by a specialized Third-Party Risk Management Centre of Excellence team.
- Continue to communicate ISG’s Modern Slavery Risk Appetite, both internally as well as to our supply chain.

Policy Commitment

- Review existing policies to identify opportunities to meet our commitment to eradicate business-related human exploitation by 2030.
- Continue to expand adoption of our Supplier Code of Conduct.
- Incorporate ISG’s commitment to the eradication of Modern Slavery into our wider ESG commitments and policy.

Due Diligence

The results of the diagnostic assessment we have undertaken will support our efforts to refine our approach to enhancing our Modern Slavery due diligence. We intend to:

- Streamline our processes to assess any suppliers that historically may have been considered outside the remit of the Modern Slavery Act such as fourth and nth parties.
- ISG’s Third-party Risk Management Centre of Excellence will lead the review of our Supply Chain Services policies and process (including a review of our Supplier Code of Conduct) along with ISG Legal and HR to confirm if any improvements can be made in terms of supporting human rights and anti-modern slavery practices.
- Carry out in-depth assessment, including interviews and on-site audits, of selected high-risk suppliers, based on industry and geography to assess suppliers’ standards, policies and programs, relating to human rights and modern slavery issues.

Drive Improvements

- ISG will work with its suppliers, identified as requiring improvement in certain areas, to ensure that the suppliers take corrective actions to strengthen their approach to managing any potential Modern Slavery risks.

Engage with our staff, suppliers and client community

- Contribute to knowledge sharing through webinars and speaking events on Modern Slavery and its impacts, based on our experience of identifying and addressing Modern Slavery risks in our own operations and supply chain as well as that of our clients.
- Provide pro-bono advice to the not-for-profit industry.
- Continue to deliver impactful work in helping our clients identify and manage modern slavery risks in their operations and supply chains.

Monitoring Effectiveness

- Improve the metrics which will enable us to evaluate the progress we are making with respect to addressing Modern Slavery and human trafficking in our operations and supply chain.
Modern Slavery – A Key ESG Factor

ISG operate in multiple jurisdictions with Modern Slavery legislation such as the UK, France, the Netherlands, California, Germany and, of course, Australia. Hence, ISG has incorporated its approach to Modern Slavery into its ESG framework globally as we believe that incorporating ESG factors into our organisational practices is good business practice.

The UN’s Sustainable Development Goals include the aim to eradicate modern slavery by 2030.

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<th>No Poverty</th>
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<th>Quality Education</th>
<th>Gender Equality</th>
<th>Sustainable Cities and Communities</th>
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- Air Pollution
- Carbon Emissions
- Climate Change
- Energy Efficiency
- Recycling and Reuse
- Water Pollution
- Modern Slavery and Human Trafficking
  - Diversity, Equity and Inclusion
  - Health and Wellbeing
  - Community Impact and Relations

- Board Structure and Composition
  - Organization purpose, strategy & accountability
  - Corruption and Bribery
  - Risk Management

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Thank You

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