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WiseTech Global Modern Slavery Statement 2024

This statement has been prepared by WiseTech Global Limited to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) and the United Kingdom's *Modern Slavery Act 2015* (**Modern Slavery Acts**). This statement provides an update on our progress in the 12 months to 30 June 2024 (**Reporting Period**) and our plans for further improvements in the next financial year ending 30 June 2025. Appendix 1 at the end of this statement contains a table to identify where we have addressed mandatory and recommended criteria of the Modern Slavery Acts.

OUR STRUCTURE AND REPORTING ENTITIES

Our structure

The ultimate parent entity for our corporate group is WiseTech Global Limited. WiseTech Global Limited is an Australian public company listed on the Australian Securities Exchange (ASX: WTC).

WiseTech Global Limited is headquartered in Sydney, Australia and as at 30 June 2024 encompassed approximately 87 subsidiaries across 33 locations globally. Some subsidiaries in our group are not operational or external-facing. A complete list of the entities that comprise the WiseTech Global group as at 30 June 2024 is contained in our 2024 Annual Report available at: <u>https://www.wisetechglobal.com/investors/annual-reports/</u>(see p.144–146).

Reporting entity	Reported pursuant to Australia Modern Slavery Act 2018 (Cth)	Reported pursuant to UK Modern Slavery Act 2015
WiseTech Global Limited (ACN 065 894 724)	\checkmark	
WiseTech Global (Australia) Pty Ltd (ACN 112 936 991)	\checkmark	~
WiseTech Global (UK) Ltd		~
WiseTech Global (US) Inc.		~
Blume Global Inc.		~

Reporting entities covered by the statement

Although this Statement is only required for the aforementioned reporting entities, it also applies to all WiseTech Global Limited's subsidiary entities globally (together referred to as **we**, **us**, **our**, **the Group**, or **WiseTech**).

Unless otherwise stated, figures quoted in this Statement are valid as at 30 June 2024.

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OUR OPERATIONS AND SUPPLY CHAIN

Our operations

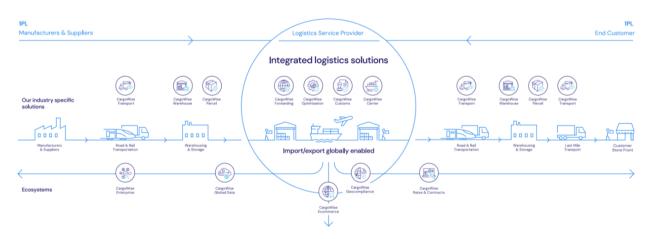
WiseTech is a leading provider of software solutions to the logistics industry globally. We develop, sell, and implement software solutions that enable customers to manage their involvement in logistics and the global supply chain in areas such as freight forwarding, customs clearance, tracking, warehousing, cross-border compliance, and transport.

We provide our solutions to over 17,000 customers in 183 countries. Our customers range from small and mid-sized domestic and regional logistics providers to large multi-national and global logistics providers, including all of the Top 25 Global Freight Forwarders and 46 of the Top 50 Global Third-Party Logistics Providers (3PLs).

Our vision is to be the operating system for global logistics.

Our core product is CargoWise, a cloud-based supply chain and logistics software solution. In addition to CargoWise, we own and operate a number of products which enable customers to manage their involvement in logistics and the global supply chain. Further information is available at <u>https://www.wisetechglobal.com/what-we-do/our-businesses/</u>.

We operate data centers in Australia, the United States, and Europe. Data centers host our CargoWise solution, which is accessed directly by customers through the cloud. Data centers also host services that relate to software development and product improvements.



Our workforce

To deliver on our commercial strategy, as of 30 June 2024 we had 3,494 employees across 38 countries. We also had 177 non-employees and contingent workers across 28 countries.

The majority of our team members are in countries with comparatively low risk of modern slavery. Whilst we recognize that no country is free from modern slavery, some countries possess a lower risk due to strong governance, social protections and higher levels of economic stability, amongst other factors.



Countries with the largest number of WiseTech **employees** and Modern Slavery prevalence per country.

Country	% of total employees	Global Slavery Index 2023 ranking ¹
Australia	36%	#149
India	17%	#34
USA	12%	#122
China	6%	#111
United Kingdom	4%	#145

Countries with the largest number of WiseTech **non-employees and contingent workers** and Modern Slavery prevalence per country.

Country	% of total non-employees and contingent workers	Global Slavery Index 2023 ranking¹
Australia	42%	#149
India	11%	#34
United States	9%	#122
Philippines	8%	#36
Poland	3%	#80

Top 5 lowest ranked countries for modern slavery out of all countries where WiseTech has **employees**.

Country	% of total employees	Global Slavery Index 2023 ranking ¹
Turkey	1%	#5
United Arab Emirates	O.1%	#7
India	17%	#34
Philippines	1%	#36
Mexico	1%	#64

¹ Global Slavery Index 2023, Walk Free. #1 = country with the highest estimated prevalence of modern slavery per 1,000 population and #160 = country with the lowest prevalence of modern slavery per 1,000 population.



Top 5 lowest ranked countries for modern slavery out of all countries where WiseTech has **non-employees and contingent workers.**

Country	% of total non-employees and contingent workers	Global Slavery Index 2023 ranking ¹
Russia	1%	#8
Ukraine	1%	#11
Pakistan	1%	#18
India	11%	#34
Philippines	8%	#36

WiseTech does have team members in countries which are estimated by international human rights group *Walk Free* to have a relatively high prevalence of modern slavery, however the numbers of WiseTech team members in these locations are very small.

The typically highly-skilled nature of the work performed by team members whether directly employed by us, contracting as sole traders or via intermediaries, further reduces the inherent risk of modern slavery in our operations. We are proudly a product-led business with over 60% of our employees in product design and development roles, working as highly skilled software engineers and product managers. The remainder are in technical and product support, general and administration or sales and marketing functions.

Additionally, our centralized People and Talent functions within our Australian headquarters means we ultimately consider the residual risk of modern slavery within our operations to be low.

Our centralized functions are supported by distributed People Operations and Talent team members across the APAC, EMEA and North America regions to meet the needs of our rapidly expanding workforce. This allows us to become familiar with local hiring practices, and to promote our understanding of and compliance with employment legislation, while being anchored by global policies and expectations. When hiring workers as employees, our standard process includes visa checks to ensure eligibility to work in the country, background checks, and remuneration benchmarking to ensure equitable and fair compensation.

Non-employee and contingent workers comprise a small portion of our workforce. We strongly favor arrangements where we have direct employee relationships with individuals, however this is not always practicable.

There are four main types of non-employee and contingent workers at WiseTech:

Category	Why and how they work with WiseTech
Agency	Temporary workers arranged through recruitment agencies. Workers are engaged when a role needs to be filled quickly or is short-term. Agency workers generally



	perform administrative duties and were all engaged in our Head Office during the period.
Service providers	Direct contractual relationship is with a sole trader or an incorporated business the individual is a director of. Service providers are usually technical or industry experts brought in to complete discreet projects.
Student interns	Undergraduates or graduate students on work experience or industry placements. Working conditions are under the direct control of WiseTech and the university pays the students. At the end of their engagement students move on to other forms of employment elsewhere or may be offered a casual position with WiseTech while they complete their university study.
Third party operators	Individuals working for a consultancy working with WiseTech for a period of time and treated as team members. The firms are known to individuals in the organisation procuring services, such as software development or financial advisory. The terms of the engagement are determined by WiseTech and include clauses regarding the third-party's responsibilities regarding occupational health and safety. Some individuals convert to WiseTech employees or are replaced with equivalent employee hires.

Acquisition forms part of our growth strategy as a business, and the acquisition of new entities can result in the growth of this population if agencies or contractors form part of the acquired company workforce.

Prior to acquisition, WiseTech's People and ESG teams undertake M&A due diligence to understand the workforce make-up of target companies as part of the M&A process.

Post-acquisition, a key focus of our People team is to move critical and highly-skilled resources to suitable employee arrangements. This is primarily to reduce tax and compliance risks as well as improving engagement and oversight of workers. On occasion we may leave third-party arrangements in place while we integrate an acquired product into our product suite.

Our supply chain

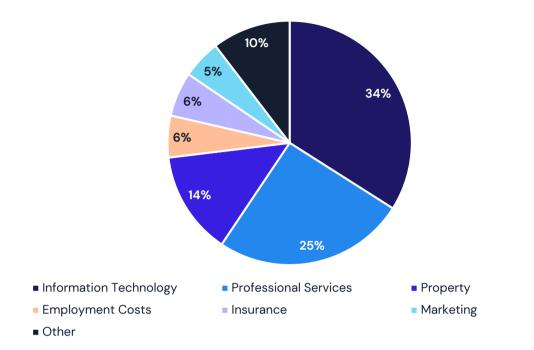
Our upstream supply chain consists of providers of services, equipment and facilities that support the operations of a software business.

As a Group we had approximately 2,500 active suppliers in FY24 across 54 countries, with our top 25 suppliers accounting for 40% of spend².

Nearly 60% of our supplier spend in the period is allocated to Information Technology and Professional Services, representing the largest components of purchased goods and services.

² Accounts payable data from our core finance system, excluding inter-company transfers and tax payments. Some legacy finance systems are in operation within some entities in the Group and this data is not part of the data set in this Statement.

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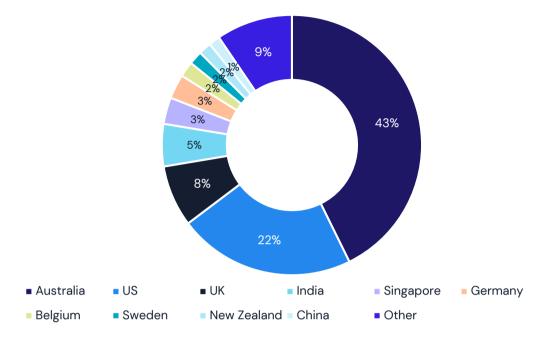


Category **Description of costs** Information Technology Software (e.g. licenses and subscriptions) _ Data center (e.g. racks, servers and services for _ WiseTech and co-located data centers) Cloud services (externally hosted) End-user computing devices (e.g. laptops and _ monitors for team members) Network maintenance _ **Telecommunications Professional Services** Legal and Financial costs, Information Technology and other consulting. Office rent, utilities, building maintenance and staff Property amenities e.g. food and beverage. Recruiters, payroll costs (excluding salaries), contractors, **Employment Costs** staff training, vehicles, travel expenses (paid via accounts payable). Insurance Normal business insurance program. Memberships of industry bodies and associations, Marketing sponsorships, giveaways including merchandise. Other Prepayments for services in other categories, miscellaneous costs.

% WiseTech Global direct supplier spend by category²



Over 90% of supplier spend processed through accounts payable via our core finance system is with suppliers located in 10 countries:



% WiseTech Global direct supplier spend by location²

MODERN SLAVERY RISKS

Risks

Our relationship to modern slavery risks is considered using the continuum of involvement from the UN Guiding Principles on Business and Human Rights. There are different ways companies may be linked to modern slavery, each with different expectations in terms of remediation as indicated in our summary table below:

INVOLVEMENT TYPE	CAUSE X		
Description of relationship to risk	Company's operations may directly result in modern slavery practices e.g. using exploited labor within the company's operations.	Company's operations and/or actions in its supply chains may contribute to modern slavery e.g. setting unrealistic price expectations on suppliers.	Company's operations, products or services may be connected to modern slavery through the actions of another company it has a business relationship with e.g. company buys a product made with exploited labor.
	Leverage a company has Most	s to prevent impact and exp	bected role in remediation

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Our assessment found that the potential risks of modern slavery were most likely to arise through our Group's purchasing decisions, rather than the Group itself causing or contributing to modern slavery directly through our operations.

We consider the risk of modern slavery in our supply chain to be relatively low based on the location of our suppliers, the nature of the goods and services we acquire and the highly technical nature of our business as a software company.

In FY23 we reviewed our risk areas with the support of an independent third-party with expertise in business and human rights. In FY24 the risk assessment was reviewed and 'Leases and office spaces' added as a supply chain risk area for our business. WiseTech's Property strategy is to move towards flexible office spaces in co-working facilities instead of traditional lease arrangements. As such, we consider property to be an overarching risk category due to its connection to Facilities Management, Office Fit Out and Furniture, Catering and Solar Panel risk categories. As these categories increasingly move into the second tier of our supply chain rather than being directly contracted, we have introduced Leases and office spaces within the risk categories considered by relevant functions in the Group when making purchasing decisions.





IDENTIFIED SUPPLY CHAIN RISKS

Risk area	Description of inherent risk	Why it's a risk	Our lil to risl	kely relationship <
Catering	Risk that forced labor, child labor and debt bondage occurs in the workforces of our catering suppliers and their supply chains, including food harvesting and production.	Base-skill work performed by potentially vulnerable workers, such as women and migrants who may be in more precarious financial positions and therefore more susceptible to exploitation.	8	Directly linked through business relationships.
Facilities management	Risk that human trafficking and debt bondage occurs in the workforces of cleaning, security and waste management services we purchase directly or indirectly via property providers.	Base-skill work performed by potentially vulnerable workers, such as women and migrants. Labor is often subcontracted in this sector. Purchasing decisions may also happen indirectly via property suppliers, decreasing visibility.	<u>&</u>	Directly linked through business relationships.
IT hardware	Risk that forced and child labor occurs in the extraction and processing of raw materials for electronics, as well as the manufacture of IT hardware components and finished products.	Metals, minerals and IT components often originate in countries with known modern slavery risks, with high prevalence of base-skilled or migrant workers.	<u>&</u>	Directly linked through business relationships.
IT support services	Risk that debt bondage or deceptive recruitment occurs in the provision of IT support services, such as outsourced software development.	Despite the high-skilled nature of this work, IT support services are concentrated in higher risk geographies and subcontracting and offshoring can be common.	8	Directly linked through business relationships.
Office fit out and furniture	Risk that forced labor, child labor and debt bondage occurs in the extraction and processing of raw materials and/or production of office fit-out materials and furniture.	Materials used in office fit outs and furniture involve base-skill labor, and production is concentrated in countries with known modern slavery risks. Purchasing decisions may happen indirectly via property suppliers, decreasing visibility.	8	Directly linked through business relationships.
Promotional merchandise	Risk that forced labor, child labor and human trafficking occurs in material extraction, processing and clothing production, as well as other forms of merchandise.	Garment production involves base-skill work performed by vulnerable workers concentrated in countries with known modern slavery risks. Purchasing decisions may happen via intermediaries, decreasing visibility.	8	Directly linked through business relationships.
Leases and office spaces	Risk that human trafficking and debt bondage occurs in the supply chains of our managed office and co-working facilities.	See Catering, Facilities management, Office fit out and furniture and Solar panels risk details.	<u>%</u>	Directly linked through business relationships.
		Managed office and co-working facilities typically sub-contract the above activities, meaning Leases and office spaces are considered an overarching risk area.		
Solar panels	Risk that forced labor occurs in the extraction and processing of raw materials for solar panels and component parts.	Concentration of raw material production in higher risk geographies with deep supply chains, decreasing visibility. Purchasing decisions may happen indirectly via intermediaries, decreasing visibility.	8	Directly linked through business relationships.
Travel and hospitality	Risk that debt bondage, deceptive recruitment and human trafficking occurs in the provision of hospitality services, such as transportation and hotels.	Base-skill work performed by potentially vulnerable workers, such as women and migrants. Subcontracting of labor can be common. Purchasing decisions may happen indirectly via intermediaries, decreasing visibility.	<u>&</u>	Directly linked through business relationships.



MANAGING MODERN SLAVERY RISKS

Governance

As per the <u>Board Charter</u>, the Board of WiseTech Global Limited (**Board**) is responsible for overseeing the implementation and management of the Group's ESG practices and initiatives, which includes modern slavery. Approval of our annual Modern Slavery Statement is also undertaken by the Board.

Modern slavery as a topic is managed day to day by the Sustainability & ESG team, which develops and coordinates delivery of the organization's modern slavery workplan involving relevant functions including Legal, Finance, Procurement, Property, Communications and M&A.

Our Modern Slavery working group, comprised of relevant functions, convenes when necessary to review high level risk assessments, efficacy of existing controls and the modern slavery workplan.

Policy-based controls

WiseTech has various policies that require our employees and all parties acting for us, or on our behalf, to maintain the highest ethical standards in relation to our business.

During the period our Code of Conduct was updated to specifically reference and clarify the expectation of team members in mitigating the risk of modern slavery in WiseTech's operations and supply chain.

Our intranet features a Policy and Principles section where team members can access a wide range of guidance as to expected conduct in multiple languages. Key documents relevant for the management of Modern Slavery risk are as follows:

Document	Relevant detail	Coverage	Implementation
Code of Conduct	States team members are required to be aware of the risks of modern slavery to the Group and to conduct due diligence as relevant to their role.	All people across WiseTech Global including all employees, other	Communicated to all employees in onboarding Available on our
	Affirms the requirement for all Employees and Workers to	workers and Directors.	intranet in multiple languages.
	undertake annual Modern Slavery compliance training.		Mandatory training exam as part of Onboarding, then
			every two years. Reviewed annually

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Human Rights	Affirms our commitment to	Applies to anyone	Available on the
Principles	upholding and respecting human	employed by	Corporate
	rights as articulated in the UN	WiseTech Global,	Governance section
	Guiding Principles on Business	including	of our corporate
	and Human Rights.	contractors,	website.
	States WiseTech Global will not engage in, nor support the use of coercion, threats, or deception of individuals for commercial gain.	consultants, secondees and directors.	Reviewed annually.
	States WiseTech Global may avoid or cease working with		
	suppliers or businesses that are		
	known to engage in modern		
	slavery.		

Whistleblower Protection Principles and Whistleblowing Policy Australia	Establishes mechanisms and procedures to report suspected unethical or illegal conduct, including any modern slavery concerns, in a manner which protects the whistleblower and gathers the necessary information for us to fully investigate such reports and act appropriately.	Anyone who is employed by or works at WiseTech Global, including employees, contractors, consultants, secondees and Directors.	Available on our intranet and Corporate Governance section of corporate website. Reviewed regularly.
	Details the protections in place for a person making a report.		

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Training and education

Since 2021 all team members are required to complete mandatory training on Modern Slavery once a year and as part of onboarding. The online course includes information about Modern Slavery and a short test. As of October 2024, 99% of team members are compliant with this requirement. Any cases of incomplete training are escalated to people leaders and followed up to ensure completion.

To reinforce the content of the mandatory training and WiseTech's Code of Conduct, this year information on our intranet was refreshed to help team members support modern slavery risk management at WiseTech. This content is aimed at team members across the company who are involved in the purchase of goods and services, but is applicable for anyone.

The Modern Slavery page includes information about our identified risk categories in an accessible location and format. The risks, a description of each risk and the causes of each risk are detailed. Team members are instructed with practical steps they can take to assess risk levels of a prospective supplier and help act as a 'first line of defense' against modern slavery risk in our supply chain. This includes checking whether the prospective supplier publishes a Modern Slavery statement, has policies or information about what is expected of its own suppliers, whether it has completed a risk assessment and whether it takes steps to manage modern slavery risks.

Contractual controls for suppliers

Building on our existing Supplier Code of Conduct (Labour), during the period we finalized and implemented an updated and expanded Modern Slavery clause for use and negotiation where possible within contracts between WiseTech and vendors supplying products or services in our identified risk categories. Broadly speaking, this clause covers compliance, investigation, rectification, subcontractor-related and notification obligations of the vendor, as well as related WiseTech audit and termination rights.

Related processes and content were updated during the period to support the implementation of this contractual control by WiseTech's Legal department.

Supplier-specific risk assessments

As stated in our previous Modern Slavery Statement, this year we sought to improve categorization of our suppliers to better enable modern slavery risk assessment and management. During this reporting period Sustainability & ESG and Finance team members collaborated to flag relevant General Ledger account categories as having a potential connection to WiseTech's Modern Slavery risk categories. Spend data was analyzed and a sub-section of suppliers were longlisted for further assessment, based on financial materiality, sectoral relevance and geography.

We commenced supplier-specific assessment, focused on the existence of Modern Slavery risk controls. Relevant suppliers were then analyzed for residual risk of modern slavery via a desktop review exercise. The assessment considered the existence of a Modern Slavery statement, policy documentation and whether the supplier mandates training for team members. The assessment also looked for public disclosure of any steps taken to manage modern slavery risks. No further actions were deemed necessary to take with these suppliers further to this initial risk assessment.

Supplier-specific risk assessments were also performed on some relevant prospective suppliers during the period within key risk categories. Assessments examined the public disclosures of



prospective suppliers and in some cases short questionnaires were issued to obtain information directly from suppliers.

We continue to explore scalable and decision-useful tools to support efficient supplier-specific risk assessments for both incoming and existing suppliers. Existing processes and systems for supplier onboarding and vendor master data will be considered as part of a wider finance transformation project taking place in the business over the next year.

Downstream due diligence

Acquisitions are a key way we accelerate product development at WiseTech. We acquire businesses which enable us to fast track the extension of our core CargoWise product with new functionalities and adjacent market capabilities.

During the period we strengthened the assessment of relevant ESG factors within the M&A due diligence process, including Modern Slavery. The Sustainability & ESG team participate in early internal briefings about acquisition targets and are able to ask questions and access information about entities to assess the level of modern slavery risk, amongst other ESG matters. Whilst the focus of the Commonwealth's Modern Slavery Act is on an entity's operations and supply chain, we recognize the importance of considering Modern Slavery risk, particularly operational risk, of businesses which may become part of the WiseTech Global group.

Our Modern Slavery Incident Response, Management and Remediation Framework

Our Modern Slavery Incident Response, Management and Remediation Framework is published on our intranet and sets out what WiseTech will do if an instance of modern slavery is suspected or identified in our operations or supply chain.

Additionally, anyone who is employed by or works at WiseTech can utilize the Company's anonymous whistleblower portal or raise concerns with their immediate manager, as outlined in the Whistleblower Protection Principles (and the Australian Whistleblower Policy, for Australian team members). During the period we commenced a review of the portal and plans are underway to introduce a Modern Slavery module so that users are aware of and facilitated to use the whistleblower portal to lodge Modern Slavery grievances or concerns.

Our approach to modern slavery incidents is to adopt a victim-based approach that prioritizes victims' rights. If we identify risks or issues with potential or current third-party suppliers, we will take appropriate measures to ensure corrective actions are implemented that are consistent with our remediation plan. We will work with any entity causing the impact identified to prevent or mitigate the harm and its recurrence where possible. We recognize that removing workers from harm may lead to unintended consequences for the victims and other victims. In some circumstances (e.g. if the supplier fails to cooperate with us), we will engage with senior management of that supplier and may suspend or terminate that supplier arrangement.



As part of our workplan for the year ahead, we are reviewing the suitability of current and future mechanisms for external parties to flag concerns or grievances.

Example of the potential application of WiseTech's Modern Slavery Incident Response, Management and Remediation Framework

An employee overhears an office cleaner being told by their supervisor they will harm the worker's family if they do not continue working. The employee suspects forced labor is occurring.

In accordance with training and instructions on the modern slavery intranet page, the employee emails WiseTech's Legal team to flag the suspected instance. Legal consults with WiseTech's Procurement function. Within three business days the Procurement function conducts a preliminary assessment of the report and consults with the Company Secretary or Chair of the Audit & Risk Committee, as appropriate. A detailed record of the investigation including any questions asked or answered will be kept. The incident will be reported to law enforcement if necessary.

If an incident has been identified, WiseTech will work with the supplier in question to address root causes instead of immediately terminating the business relationship. WiseTech will consider contributing to remediation if applicable. If the issue is identified as systemic and the supplier fails to address root causes and produce improvement, we will consider contract termination.

Audits of all suppliers in the same industry and/or same geolocation will be considered in the event of an incident. As applicable, WiseTech's Corporate Communications team will be engaged to assist with any communications to stakeholders regarding the incident.

ASSESSING THE EFFECTIVENESS OF OUR MEASURES

We assess the effectiveness of the actions taken to assess and address the risks of Modern Slavery in a variety of ways.

Before and during the period we developed and maintained a Modern Slavery workplan spanning the next one to two years, which details actions under key workstreams with proposed timeframes for completion. Each workstream is linked to a strategic objective or outcome which will be achieved if the tasks are completed. Activities are tracked against our workplan, which is used as a mechanism to review the actions we have taken. The effectiveness of the actions in achieving the strategic objective are assessed by the Sustainability & ESG team in collaboration with internal stakeholders as appropriate, with activities repeated, rescheduled or reallocated as necessary or additional activities introduced.

During the period Modern Slavery risks from our Modern Slavery risk assessment were added, as needed, to WiseTech's risk management system. The integration of Modern Slavery risks into our core risk management system serves to assess the effectiveness of risk controls and raise the visibility of management practices internally. Each risk has an assigned cause, impact, inherent and residual risk rating based on existing management controls in place, and treatment plans are detailed to mitigate any residual risk. Risks are assigned owners and treatment plans have target dates.



Another longstanding measurement approach which continued this year has been recording compliance rates with modern slavery training. Along with other mandatory compliance training, compliance rates are reported regularly to management and to our Board of Directors.

CONSULTATION WITH ENTITIES

A large portion of WiseTech's procurement and contract management processes are managed out of our Sydney headquarters, and we have implemented requirements that supplier agreements be reviewed centrally by our headquarters team prior to execution. As such, engagement between our Procurement and Legal functions and relevant individuals in our controlled entities with responsibility for implementing policies, managing teams and supplier relationships, including reporting entities within this statement, has taken place during the Reporting Period. At the end of the period, senior representatives from each business unit across the Group were asked to confirm that they and their teams took steps to mitigate the risk of modern slavery within WiseTech's operations and supply chain. Each reporting entity covered by this Statement confirmed the accuracy of this assertion.

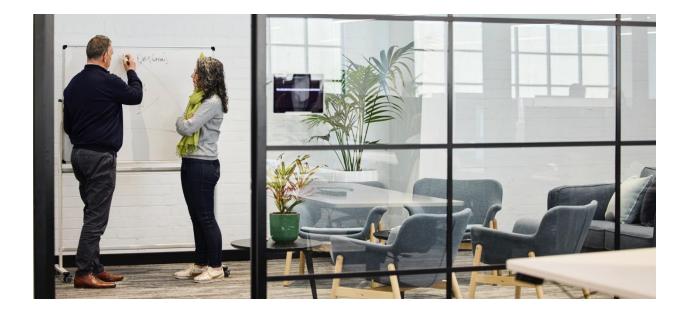
In addition, this Statement has been prepared in consultation with People Operations, Finance and Legal teams in Sydney who engage with business leaders who have oversight of the reporting entities and relevant non-reporting entities.

APPROVAL OF THIS STATEMENT

This Statement has been approved by the Board of Directors of WiseTech Global Limited, WiseTech Global (Australia) Pty Ltd, WiseTech Global (UK) Ltd, WiseTech Global (US) Inc and Blume Global Inc.

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Lisa Brock, Non-Executive Director 28 November 2024





Australian Modern Slavery Act 2018 (Cth) – mandatory criteria ³	<i>UK Modern Slavery Act 2015 –</i> recommended criteria⁴	FY24 Modern Slavery statement location
Identify the reporting entity		p.1 Reporting entities covered by the statement
Describe the structure, operations and supply chain of the reporting entity	Organization structure, its business and its supply chains	p.1 Our structure pp.2-7 Our operations and supply chain
Describe the risks of modern slavery practises in the operations and supply chain of the reporting entity and any entities that the reporting entity owns or controls	The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place	pp.7-9 Modern Slavery risks
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	Policies in relation to slavery and human trafficking	pp.10-14 Actions taken to assess and address risks
	The steps taken to assess and manage the risk of slavery and human trafficking	
	Due diligence processes in relation to slavery and human trafficking in its business and supply chains	
	Training about slavery and human trafficking available to its staff	
Describe how the reporting entity assesses the effectiveness of such actions	Its 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	pp.14-15 Assessing the effectiveness of our measures
Describe the process of consultation with i) any entities that the reporting entity owns or controls; and ii) in the case of joint modern slavery statements, the entity giving the statement		p.15 Consultation with entities
Any other information that the reporting entity considers relevant		n/a
Approval by the principal governing body of the reporting entity	(Approval by the board of directors is also required under section 54(6)(a) of the UK Modern Slavery Act 2015)	p.15 Approval of this statement

Appendix 1 – Statement alignment with Modern Slavery Act criteria

³ Pursuant to section 16 of the Australian *Modern Slavery Act 2018* (Cth)

⁴ Pursuant to section 54(5) of the UK Modern Slavery Act 2015