

Institutional Shareholder Services Inc.

Joint Modern Slavery and Human Trafficking Statement

Introduction

At Institutional Shareholder Services Inc. (“ISS”) our aspiration is to serve our clients with their full trust and confidence. Ultimately, we are guided by this most basic tenet: Do the right thing.

That value applies both within the organisation and in our dealings with suppliers. We do not and will not tolerate any breaches, whether due to conscious action, complacency, indifference, or lapse of ethical judgment.

We are issuing this joint statement, pursuant to the Modern Slavery Act 2015 (UK) (“MSA 2015”) and the Commonwealth Modern Slavery Act 2018 (“Cth 2018”) that sets out the standards ISS has in place when addressing modern slavery and human trafficking issues that could pose a risk in our business and supply chains, and designed to ensure we have taken the appropriate measures to address these risks for the financial year ending 31 December 2020.

We adopt a “zero-tolerance” approach to modern slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are not present either in our operations or supply chains. ISS is committed to working with our suppliers as appropriate to ensure that these risks are identified and managed proactively.

This joint statement has been reviewed and approved by the ISS Board of Directors.

Our business

ISS is a global business currently operating in 15 countries. Through our group of companies, we provide corporate governance and responsible investment solutions, market intelligence, fund services, and events and editorial content for institutional investors and corporations.

The following ISS subsidiary companies operate in the UK:

- (1) Research, Recommendations and Electronic Voting Limited;
- (2) ISS Europe Limited;
- (3) Asset International Financial Information UK Holdings Limited;

- (4) AI Financial Information UK Limited;
- (5) Intelligent Financial Systems Limited; and
- (6) Matrix-Data Limited

The following ISS subsidiary companies operate in Australia:

- (1) Institutional Shareholder Services (Australia) Pty. Ltd; and
- (2) Asset International Australia PTY Ltd.

The services provided by our UK and Australia subsidiaries are generally the same as those provided across the group as described above.

Further information about our business can be found at: <https://www.issgovernance.com/>

Considering the nature of the services ISS provides globally and that the services are being executed by approximately 2,200 in-house salaried and highly skilled professionals, we believe that there is a very low risk of slavery and human trafficking within our business and supply chains.

Our supply chains and identifying modern slavery risk

Guided by our corporate values, ISS is committed to conducting our business in a legal, ethical and responsible manner, as well as to minimizing the social, environmental and ethical impact of our supply chain. We believe that acting responsibly depends not only on the action of our company and our own employees but also upon our vendors who we expect to share our commitment to ethical business practices. We expect our vendors to comply with all applicable laws and regulations in which they operate as well as the principles set forth in our Vendor Sustainability Policy, a copy of which can be found on the ISS website.

All ISS products are procured and developed in-house by ISS salaried employees. We do not outsource or subcontract any of the services we provide to clients or third parties and therefore we do not operate a large supply chain. Goods and services provided to our business typically include office supplies and equipment, financial data and certain IT services.

As a result of our compact supply chain, we have assessed that there is a very low risk of slavery and human trafficking within our supply chain. We have therefore taken a proportionate response to that risk, the details of which are set out below.

Mitigating Modern Slavery and Human Trafficking Risk

While we have recognized the risk of modern slavery and human trafficking is very minimal within our organizational structure and also within our supply chain, we have taken steps to assess risk across our business lines to ensure we are able to identify and manage any potential risk by:

- 1) Creating a Corporate Responsibility Policy that respects and supports all internationally recognized human rights as articulated in the United Nations Universal Declaration of Human Rights, as well as the core standards of the ILO Declaration on Fundamental Principles and Rights at Work; as well as committing to avoiding complicity in human rights abuses.
- 2) Establishing a General Code of Conduct that sets out the standards and highlights the expectations of ISS and its employees to do the right thing, comply with applicable laws and policies and to act in a professional manner.
- 3) Ensuring all employees are aware of the steps they can take to report suspicious activities and the protection afforded to whistleblowers.
- 4) Adopting policies related to Human Resources focusing on ISS' commitment to equal employment opportunities and to ensure our compliance with all applicable national and local laws pertaining to hiring.

Compliance

ISS has an existing compliance program which is reflected, in part, in the General Code of Conduct which governs the conduct of all of our employees. Details about our program and a copy of the General Code of Conduct can be found here: <https://www.issgovernance.com/compliance/du-diligence-materials/>

In direct response to the risk of slavery and human trafficking, we have built on our existing compliance framework by:

- Taking external legal advice on the application of the modern slavery policies to our business;
- Conducting a high-level assessment of our business and our supply chains;
- Holding discussions within the firm to ensure compliance;
- Committing to periodically reviewing our position on slavery and human trafficking issues.

No incidents of modern slavery and human trafficking were reported during the financial year ending 31 December 2020.

Due diligence in our supply chains

If we identify suppliers to be “at risk” of slavery and human trafficking, we will communicate to them our commitment to complying with the requirements of the MSA 2015 and the Cth 2018 and our requirement to ensure, as far as possible, that slavery and human trafficking is not occurring in any part of our supply chains. We will ask such “at risk” suppliers to confirm the steps they have taken both internally and in their supply chains to ensure that slavery and human trafficking is not occurring. As of the date of this statement, we have not identified any “at risk” suppliers.

Key Performance Indicators

ISS uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Any and all incidents of modern slavery and human trafficking reported are investigated within 24 business hours.
- We will track the response of “at risk” suppliers (if any) to our request to advise us on the steps they have taken to ensure slavery and human trafficking is not occurring.

The results from these key performance indicators can be found above.

Future steps

We will continue to monitor the effectiveness of our compliance regime and take necessary steps to address any identified instances of slavery and human trafficking on an ongoing basis. Since our last statement, we have not identified any material changes to our assessment as described above.

Institutional Shareholder Services Inc.

A handwritten signature in black ink, appearing to read "Gary Retelny", written over a horizontal line.

By: Gary Retelny, President, CEO and Board member

Date: June 29, 2021