

WiseTech Global Modern Slavery Statement 2023

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 2023 (**Reporting Period**) and our plans for further improvements in the next financial year ending 30 June 2024. 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 2023 encompassed approximately 100 subsidiaries across 31 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 2023 is contained in our 2023 Annual Report available at: <https://www.wisetechnology.com/investors/annual-reports/> (see p.142-144).

Reporting entities covered by the statement

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)	✓	
WiseTech Global (Australia) Pty Ltd (ACN 112 936 991)	✓	✓
WiseTech Global (UK) Ltd		✓
WiseTech Global (US) Inc.		✓

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 2023.

OUR OPERATIONS AND SUPPLY CHAIN

Our operations

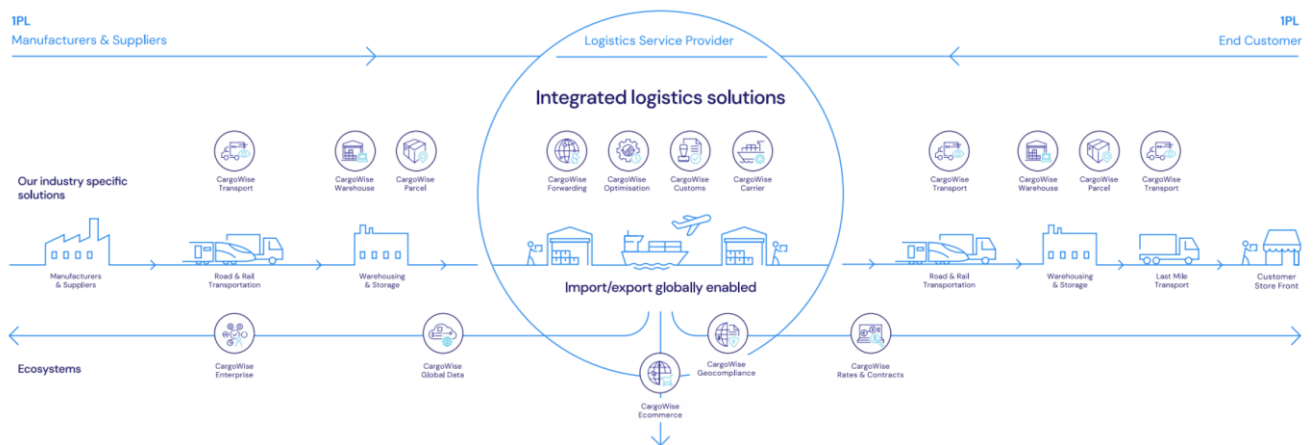
WiseTech is a leading provider of software solutions to the logistics industry globally. We develop, sell, and implement software solutions that enable customers to manage their involvement in logistics and the global supply chain in areas such as freight forwarding, customs clearance, tracking, warehousing,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

We provide our solutions to over 17,000 customers in 174 countries. Our customers range from small and mid-sized domestic and regional logistics providers to large multi-national and global logistics providers, including 24 of the Top 25 Global Freight Forwarders and 44 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 <https://www.wisetechglobal.com/what-we-do/our-businesses/>.

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

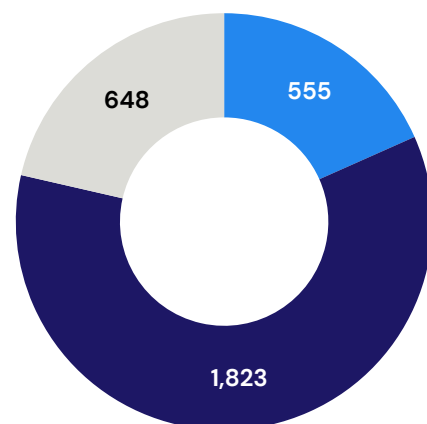
To deliver on our commercial strategy, as of 30 June 2023 we had 3,026 employees across 58 offices around the world. We are proudly a product-led business with approximately 60% of our workforce in product design and development roles. The remainder are in technical and product support, general and administration or sales and marketing functions.

Most of our workforce are highly skilled software engineers and product managers based in one of our 39 product development centers, with most concentrated in our centers of excellence in Bengaluru and Nanjing, and our headquarters in Sydney.

More than half of our people are based in the Asia Pacific Region (APAC), with 32% of our total employees based in Australia, 16% in India and 6% in China.

EMPLOYEES BY REGION

■ Americas ■ Asia Pacific ■ Europe, Middle East & Africa





Fourteen per cent of our total employees are based in the USA. In Europe, the Middle East and Africa, (**EMEA**) our people are split between numerous smaller sites, with Germany and the UK representing the largest numbers of team members in EMEA.

As at 30 June 2023 our workforce also comprised a number of non-employees globally. Non-employees are people who perform work for our business but with whom we do not have an employment relationship. Our standard process is to enter into employment contracts with workers rather than engage on a non-employee basis. This approach mitigates financial and legal risk for our business. It also means we can ensure payments to workers are made in full and in accordance with applicable laws, and that our payrolls are subject to internal controls.

Key categories of non-employees include service providers, agencies and third parties. Service providers contract directly with WiseTech, either as a sole trader or through their own incorporated business.

With agency and third-party supplied workers our contractual relationship is with the business that supplies the workers.

Agency workers are mainly used to address short-term resourcing gaps and typically set their own rates. In some instances when we acquire a company, we acquire workers who are employed via an agency in a particular country. We inherit these arrangements, and they are used as an interim solution until we can create a presence in the country, transition out of the agency arrangements, or terminate the relevant agreements.

We do not use labor hire or outsourced providers of services as a standard practice. When we acquire a company that has these types of labor hire arrangements, the number of outsourced workers in our workforce will generally increase as result of the acquisition but then gradually decrease again as we rationalize and address each arrangement. Occasionally, we may have a third-party labor supplier that provides support for a specific part of our product suite. In this case, we typically leave this arrangement in place until that part of the product is fully integrated.

Where companies that we have acquired have workers engaged on a non-employee basis, we work through each of these arrangements and determine, where possible, how to transition workers to employment. This is a critical part of our acquisition people integration processes. We aim to complete these processes within 12 months of the acquisition completion date.

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 the Reporting Period across 54 countries.¹

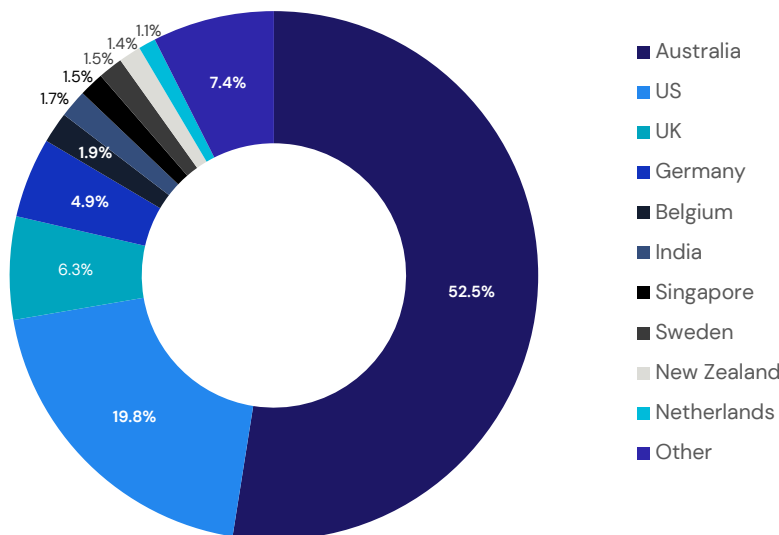
Over half of our supplier spend globally¹ relates to:

- **Data centers:** Hardware, equipment, infrastructure and information security services.
- **Software subscriptions and licenses:** Solutions to support our product and to help business services functions operate effectively.
- **Professional and consulting services:** Financial services including audit and tax, legal and technology services.

Other smaller supplier spend categories include property costs including leases and utilities, and third-party manufactured electronic devices used by our team members such as computers and laptops.

The majority of our spend is with suppliers located in the following countries:

% WISETECH GLOBAL DIRECT SUPPLIER SPEND BY COUNTRY¹



MODERN SLAVERY RISKS

We consider the risk of modern slavery in our global operations and 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.

Identifying our modern slavery risk areas





During the Reporting Period we refined our existing risk assessment with the support of a specialist business and human rights advisory firm, to ensure its continued relevance considering our company's growth. External research including the Global Slavery Index and the Responsible Sourcing Tool was used. This work built upon the existing risk assessment completed by our Modern Slavery Working Group.

¹ Data from our core finance system



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 	CONTRIBUTE 	DIRECTLY LINKED 
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.
<p>Leverage a company has to prevent impact and expected role in remediation</p>  <p style="text-align: center;">Most Least</p>			

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.

Whilst we recognize there is always a risk of modern slavery in our operations, the highly skilled nature of our business and existing controls in place by our People and Talent functions and

other corporate functions in our Australian headquarters means we consider our operational risks of modern slavery to be low.









We have people and talent acquisition team members across the APAC, EMEA and North America regions to meet the needs of our rapidly expanding workforce. Having distributed People and Talent teams 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.

When we acquire a company, we review and assess existing employment agreements in place between the worker and the acquired company for compliance with local employment laws and congruence with employment terms and conditions used across the Group. We typically issue new agreements with amended terms and conditions or move employees to agreements through an existing Group entity.



IDENTIFIED SUPPLY CHAIN RISKS

Risk area	Description of inherent risk	Why it's a risk	Our likely relationship to risk
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.	 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.	 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.	 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 or cloud services.	Despite the high-skilled nature of this work, IT support services are concentrated in higher risk geographies and subcontracting and offshoring can be common.	 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.	 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.	 Directly linked through business relationships.
Solar panels (future purchase category)	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.	 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.	 Directly linked through business relationships.

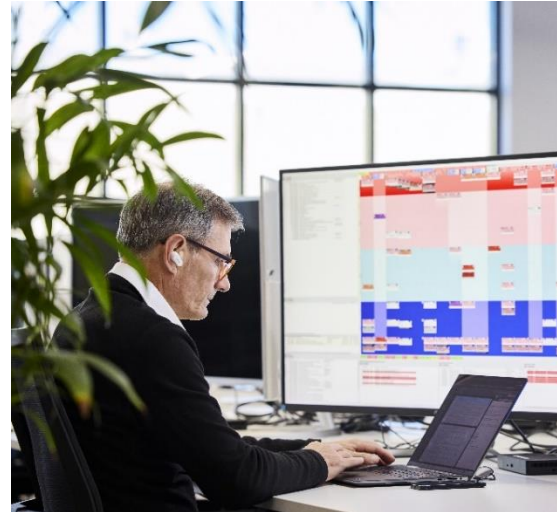
ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Governance of modern slavery

As per the [Board Charter](#), 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 undertaken by the Board.

Key policies are reviewed by the Board annually, and any material amendments will be discussed by them. During the Reporting Period, the Board approved our strengthened Human Rights Principles.

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.



We have created a Modern Slavery Working Group (**Working Group**) that ensures actions to assess and address risks are integrated into relevant parts of the business. The Working Group comprises key personnel across our ESG, Procurement, Legal, Risk, Property and People functions. During the Reporting Period the Working Group met to refine our risk assessment. Members of the Working Group also participated in interviews with our modern slavery adviser as part of an external peer review of our risk assessment. The Working Group then came together to review findings and recommendations from this project and shape the development of a workplan. Working Group members also met 1:1 with the ESG & Sustainability team to pursue specific workplan items during the Reporting Period.

Policy framework

We have a number of 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. 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. The Code of Conduct and Whistleblower Protection Principles also feature as part of mandatory onboarding training for new team members and can be accessed via our external website. All corporate policies apply across all entities in the Group.

Human Rights Principles

These principles affirm our commitment to upholding and respecting human rights as articulated in the UN Guiding Principles on Business and Human Rights. The principles are available on the Corporate Governance section of our website. They apply across our global businesses and must be adhered to by our employees, contractors, directors, and consultants and by all parties acting for us, or on our behalf, including our partners and suppliers.

During the Reporting Period we updated our Human Rights Principles to include a section on Modern Slavery and set out the key forms of modern slavery referred to in the Australian *Modern Slavery Act*

2018 (Cth). The policy states we will not engage in, nor support the use of coercion, threats, or deception of individuals for commercial gain.

Our Code of Conduct

WiseTech is committed to maintaining ethical standards in how we conduct our business activities and stakeholder relationships. WiseTech's reputation as an ethical business is important to our ongoing success.

The Code of Conduct defines the expectations and acceptable behaviors of employees, the Board, and – in certain circumstances – consultants, secondees, and contractors representing WiseTech. Our Code of Conduct outlines the ethical standards expected when performing work for WiseTech.

Purchasing Principles

This document details WiseTech's underlying purchasing principles and provides direction to all employees when engaging external suppliers. These principles supplement our online Modern Slavery training and remind all employees involved in procurement activities of our modern slavery obligations and the expectation that our suppliers conduct their business in compliance with all applicable laws and regulations. The principles are available on our intranet and utilized during procurement activities where appropriate.

Whistleblower Protection Principles

Our global Whistleblower Protection Principles establish 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. These global principles are supplemented by our comprehensive Australian Whistleblower Policy.

Risk Management Principles

We view risk management as a continual process, integral to achieving our corporate objectives, effectively managing our assets, and creating and maintaining shareholder value.

The identification and proper management of risk is an important priority of the Board and management. In developing a culture of risk management, each manager within our global businesses is responsible for appropriate risk management responses.

Additionally, we have a dedicated Risk Committee, chaired by our CEO and comprising senior executives, to provide our Board with assurance that major business risks are being identified and consistently assessed.

Modern slavery risks are included in our enterprise risk management system. Each risk is assessed for likelihood and impact in the context of existing controls within the business.

Excluding the Purchasing Principles and Australian Whistleblower Policy, the above policies are published in the public domain at <https://www.wisetechglobal.com/investors/corporate-governance/>.

Management of higher risk activities

Development of a plan in response to modern slavery risks

In the second half of FY23 we consulted a specialist business and human rights advisory firm to provide a gap analysis and roadmap to improve our management approach. This was reviewed by our Working Group and Chief Financial Officer and was in turn developed into an internal workplan spanning policy and governance, due diligence, grievance mechanisms and remediation.

Training

During the Reporting Period we worked to ensure everyone at WiseTech continues to be aware of the practices that constitute modern slavery, are able to recognize modern slavery risks, and understand the process for reporting suspicious behavior. Mandatory modern slavery training has been a key part of our team member onboarding training since 2021. This is followed up with a requirement for all team members to complete annual modern slavery refresher training.

In recognition of WiseTech having employees who do not speak English as their first language, we made the training video script accessible in twelve languages during the Reporting Period. Approximately 98% of our people successfully completed the required modern slavery training and test.² All cases of incomplete training have been escalated to people leaders and are being followed up to ensure completion.

Making expectations clear to suppliers

We have been increasingly centralizing controls and processes for entities across our Group. This includes routing supplier arrangements through centralized procurement resources and increased legal and financial team reviews of contracts for our subsidiary companies globally. This has enabled greater consideration around modern slavery risk and other business topics with subsidiaries.

Our Supplier Code of Conduct – Labor outlines our expectation that all our suppliers conduct their business activities in an ethical, lawful, and socially responsible manner and comply with all applicable anti-slavery and human trafficking laws. The Code specifically states that work must be freely chosen without the use of forced, bonded, indentured labor and all workers must be of legal age, preventing child labor. Suppliers must notify WiseTech promptly of any breach or potential breach and take all necessary action to remediate such breach. The code is publicly available on our corporate website at <https://www.wisetechglobal.com/investors/corporate-governance/>.

In the second half of the Reporting Period, we revisited the modern slavery clauses to be included in contracts for suppliers in higher risk categories, considering both content and application of the clauses. This stream of work is expected to be finalized and implemented over the coming year.

Due diligence to assess and manage risks

During the Reporting Period we began to consider possible adjustments relating to the storage and organization of supplier datasets within our core finance systems, to further streamline matters such as the identification of higher risk suppliers. Our workplan for the year ahead includes improved categorization of active suppliers to better enable modern slavery risk assessment and management.

² Data as at November 2023

We recognize the importance of identifying higher risk suppliers beyond applying high level risk factors such as geography or industry. We reviewed our existing supplier assessment questionnaire (SAQ) and piloted an amended version this year with current and prospective merchandise suppliers. The purpose of our SAQ is to understand the modern slavery risk profile unique to a supplier, to enable additional due diligence if reasonably required and to inform risk assessment.

We aim to provide useful information about supplier risk to our employees with buying responsibilities or who are within teams responsible for managing corporate risk and ESG. At the same time, we do not wish to unnecessarily overburden suppliers, some of which are small enterprises, with requests for information that may be irrelevant. Work is underway to review ways to strengthen how risk assessment, including the use of targeted SAQs, is effectively integrated within procurement across the 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).

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

WiseTech actively sought external feedback on the effectiveness of our actions during the Reporting Period by appointing an external adviser to undertake an independent gap analysis of our management approach. As a result, the Working Group has begun to review company policies and processes accordingly and make adjustments, as well as to develop and implement a workplan.

Another way we assess the effectiveness of our measures is by recording compliance rates with modern slavery training on a regular basis.

Activities are tracked against our workplan, which is used as a mechanism to review the actions we have taken.

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 function and relevant individuals in our controlled entities, including reporting entities within this statement, has taken place during the Reporting Period.

This Statement has been prepared in consultation with the Procurement team in Sydney, along with other members of our Working Group, 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 and WiseTech Global (US) Inc.

A handwritten signature in black ink, appearing to read 'Richard White'.

Richard White, Executive Director & Chief Executive Officer

6 December 2023

Appendix 1 – Statement alignment with Modern Slavery Act criteria

Australian Modern Slavery Act 2018 (Cth) – mandatory criteria³	UK Modern Slavery Act 2015 – recommended criteria⁴	FY23 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.1-4 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.5-7 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	<p>Policies in relation to slavery and human trafficking</p> <p>The steps taken to assess and manage the risk of slavery and human trafficking</p> <p>Due diligence processes in relation to slavery and human trafficking in its business and supply chains</p> <p>Training about slavery and human trafficking available to its staff</p>	pp. 8-12 Actions taken to assess and address risks
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	p.12 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. 12 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 <i>UK Modern Slavery Act 2015</i>)	p. 13 Approval of this statement

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*