



IPH Limited
Modern Slavery Statement
December 2024

IPH Limited ACN 169 015 838

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Message from the IPH Chairman, Peter Warne, and from the Chief Executive Officer and Managing Director, Dr. Andrew Blattman

IPH Limited is committed to supporting and respecting human rights across all our business activities. IPH acknowledges the risks of modern slavery globally and we are committed to identifying and preventing instances of modern slavery in all its forms across the Group's operations and supply chains.

We are pleased to present IPH's fifth Modern Slavery Statement. This Statement outlines the Group's commitment to respecting human rights and addresses how we have performed in our response to addressing modern slavery.

IPH actively reviews and assesses its approach to managing modern slavery risks on an ongoing basis. In FY25, we will continue to build awareness and educate our people and suppliers on what modern slavery is and how to recognise it, encourage our suppliers to identify modern slavery risks within their own organisations and supply chains and continue to strengthen our own approach to modern slavery.

This Statement was approved by the Board of Directors of IPH Limited on behalf of the Group on 13 November 2024.



Peter Warne
Non-Executive Director and Chairman
IPH Limited



Dr. Andrew Blattman
CEO and Managing Director
IPH Limited



1. Introduction

IPH Limited (ABN 49 169 015 838) (**IPH**) is opposed to slavery in all its forms and is committed to identifying and preventing instances of modern slavery in its operations and supply chains. IPH has a long history of acting with professionalism, integrity and honesty. The reputation of IPH and its subsidiaries, including our member firms (together the **Group, we or our**) as responsible and ethical organisations is important to our ongoing success.

This Modern Slavery Statement (**Statement**) has been prepared in accordance with the reporting requirements of Australia's *Modern Slavery Act 2018* (Cth) (**Act**) and associated guidelines. The Statement provides an overview of the work undertaken during the financial year ended 30 June 2024 (**FY24**) to assess and address modern slavery risk exposures in our business operations and supply chains.

This Statement is submitted by IPH as a joint statement on behalf of all entities within the Group, including IPH Limited and Spruson & Ferguson Pty Limited (ABN 55 601 269 050) (each a "reporting entity" as defined under the Act), as well as our member firms across Australia, Canada, Asia and New Zealand.

2. The Group's structure, operations and supply chains

2.1. Structure and operations

IPH is the holding company for an international network of intellectual property (**IP**) professional services and adjacent businesses which operate under different brands in a range of jurisdictions.

IPH operates a number of professional services businesses providing IP services, including the leading IP firms AJ Park, Griffith Hack, Pizzey's, ROBIC, Smart & Biggar and Spruson & Ferguson, as well as online IP services provider Applied Marks. During FY24, our member firms were principally involved in providing IP services to clients, including with respect to the filing, prosecution, commercialisation, enforcement and management of patents, designs, trade marks and other IP.

The Group employed a highly committed team of more than 1,600 people in FY24 with offices based in Australia, Canada, China, Hong Kong SAR, Indonesia, Malaysia, New Zealand, Philippines, Singapore and Thailand.

In this Statement, we have included modern slavery risk reduction activities conducted across all our member firms, including ROBIC, which joined the Group in December 2023.

2.2. Governance

The IPH Board has ultimate responsibility for overseeing the Group's response to risks, including modern slavery risks. The IPH Board's Audit and Risk Committee oversees the review of emerging risks, including modern slavery risks, and the management of potential risks through the application of risk management policies and processes to relevant facets of the Group. Further information on IPH's governance arrangements can be found in the IPH FY24 Corporate Governance Statement, available on the IPH website at <https://www.iphtd.com.au/investor-information/>.

At the management level, IPH has established a Modern Slavery Working Group which coordinates activities taken across the Group with respect to modern slavery. The Working Group is headed by the Group General Counsel and monitors the progress of actions related to modern slavery taken across the Group on a regular basis.

As set out further below, IPH has implemented, and continues to monitor, a number of policies and procedures across the Group which are intended to assist member firms and corporate shared services teams to identify and manage material risks, including modern slavery risks.

2.3. Supply chains

The principal supply chains within the Group can be broadly categorised as follows:

- (a) supply chains comprising of other Group member firms; and
- (b) supply chains comprising of external suppliers.

Both types of supply chains support the business operations of the Group.

In relation to the first category of suppliers, member firms often subcontract elements of their operations to other member firms. For example, AJ Park may engage Spruson & Ferguson Asia to provide patent and trade mark filing services across Asia on behalf of clients of AJ Park, whilst Spruson & Ferguson Australia may engage Smart & Biggar or ROBIC to provide patent and trade mark filing services in Canada on behalf of clients of Spruson & Ferguson Australia.

In relation to the second category of suppliers, member firms and shared services teams engage external suppliers across a number of different industries to supply goods and services, including:

- > professional services, including foreign patent and trade mark filing and agency services, recruitment services, external training and education services, external marketing services, external consultants and contractors and legal support services;
- > real estate, including utility services and other services related to Group offices;
- > technology, including IT hardware, software and print services required for the operations of the Group;
- > business products and services, including products used in Group offices, for example, furniture, stationery, office supplies, corporate merchandise and marketing materials, as well as the services that are used in these offices such as catering, security and cleaning;
- > travel services, including corporate travel and accommodation booking providers; and
- > postage and couriers.

External suppliers to our member firms and shared services teams are located around the world, with the majority based in Australia, Canada and across the Asia-Pacific region.

3. Modern slavery risks

3.1. Due diligence process and risk assessment

During FY24, we continued to conduct due diligence to assess the modern slavery risks that exist across the Group, both in the Group's operations and its supply chains.

We also continued to conduct a modern slavery risk assessment to understand our potential risks and exposure to modern slavery practices. This analysis is ongoing and will continue into FY25 and beyond.

As part of our risk assessment to date, we have categorised suppliers across the Group based on inherent risk, considering various sources of modern slavery risks such as sector and industry risks, product and services risks and geographic risks. Our approach to analysing these risks drew on guidance from several sources, including the *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities* document published by the Australian Attorney-General's Department, updated in May 2023.

Suppliers have been categorised as follows:

- (a) **Higher risk modern slavery assessed suppliers**, which include:
- suppliers that perform higher-risk services, including cleaning, security or catering;
 - suppliers that provide corporate merchandise or branded products; and
 - suppliers that perform services or manufacture goods in higher-risk countries.
- (b) **Lower risk modern slavery assessed suppliers**, which are the remaining suppliers, being:
- suppliers that perform lower-risk services, including professional services, business services, IT services and travel-related services; and
 - suppliers that perform services or manufacture goods in lower-risk countries.

3.2 Risks of modern slavery in the Group's own operations

Following an examination of our operational activities as part of the risk assessment described above, IPH considers that the residual risk of the Group causing, contributing to or being directly linked to modern slavery practices within our operations is **low**.

Across the Group, we have human resources teams in place who look after our employees' wellbeing and aim to ensure compliance with legally mandated employment entitlements across the jurisdictions in which the Group operates. Member firms and corporate shared services teams prefer to engage employees on a direct basis and to limit agency staff wherever possible. All employees are paid fairly for work performed and are subject to identity checks. In addition, employee assistance programs are offered to all Group employees and all staff have access to the Group Whistleblower Policy and the procedures set out in that policy.

Strong corporate governance frameworks are in place across the Group, which involve monitoring and addressing human rights issues under Group corporate policies. These frameworks include effective practices and procedures within all member firms and corporate shared services teams which encourage ethical behaviour and professionalism. The Group has a strong, embedded value of integrity, which is important to ensure that we retain the trust of our people, clients and customers.





We have a number of policies in place that ensure our values are maintained in operations across the Group. Each of these policies is available on the IPH website at <https://www.iphltd.com.au/investor-information/>. Further details of these policies are set out in section 4.1.

In addition, all Group professional staff are governed by codes of professional conduct or professional conduct rules for the practice of patent and trade mark attorneys and/or legal practitioners.

A strong risk management framework is also in place across the Group. This framework aims to identify and manage potential risks, including modern slavery risks, in a continuous, proactive and systematic way through high quality risk management policies and processes. IPH's risk management framework recognises risk as a business process that is owned by all management, which assists in further encouraging ethical behaviour and professionalism across the Group.

3.3. Risks of modern slavery in the Group's supply chains

IPH recognises that it may have exposure to the risk of modern slavery practices through the Group's supply chains. As noted above, IPH takes a risk-based approach to assess and address any modern slavery risks in the Group's supply chains.

Following an examination of the Group's supply chains as part of the risk assessment described above, IPH considers that the residual risk of the Group's suppliers causing, contributing to or being directly linked to modern slavery practices is **low**.

As noted in section 3.1 above, suppliers across the Group have been categorised based on inherent risk into higher risk and lower risk modern slavery assessed suppliers. Based on our analysis of the types and distribution of suppliers across the Group, management considers that the majority of Group suppliers fall within the lower risk category, with only a small number classified as higher risk having regard to these factors. During FY25, IPH plans to consider expanding the factors taken into account when assessing risk, for example, categorising suppliers based on the level of annual spend and their materiality to the Group.

For those suppliers classified as lower risk, many of the suppliers engaged by Group member firms and shared services teams are established reputable corporate entities or other professionally regulated organisations, for example, other IP services firms and accounting firms. As such, most of the relationships member firms have with external suppliers that would not usually be associated with the engagement of slave labour. In many of these instances, the relationships that member firms have with their external suppliers, such as with those providing foreign patent and trade mark filing and agency services, are trusted, direct, long-term relationships. The nature of these relationships facilitates member firms in their assessment of the risk level for such suppliers.

For those suppliers classified as higher risk, the Modern Slavery Working Group works with the relevant member firm or corporate shared services team to contact relevant suppliers, seek information about their modern slavery response and seek direct assurances from these suppliers as to the adequacy of their response. During FY24, the Working Group conducted additional due diligence on external suppliers to the new member firm, ROBIC, and with respect to the Group's newly established Spruson & Ferguson Philippines office. On completion of this due diligence process, all higher risk suppliers identified in the due diligence process were contacted and direct assurances from identified suppliers were obtained.

4. Actions taken to assess and address modern slavery risks

IPH has in place appropriate systems and controls to continue to identify and assess our modern slavery risks and manage those risks effectively.

Whilst some of those systems and controls have already been outlined above, further detail is provided below:

4.1. Policies and processes

IPH is committed to high standards of corporate governance to ensure we effectively manage risk, maintain appropriate transparency of Group operations and ensure our values are maintained in operations and supply chains across the Group.

A number of policies are in place across the Group which have been developed to assist our people and suppliers to understand the standards we expect (refer to the table below).

Supplier Code of Conduct	<p>Outlines the standards and behaviours the Group expects from external suppliers when conducting business with the Group, including that suppliers comply fully with relevant employment laws and respect human rights in the course of their business operations, including requiring compliance by the supplier with other relevant Group policies as outlined below.</p> <p>Member firms and centralised shared services teams continue to take steps to distribute the Supplier Code of Conduct to new and existing suppliers. In addition, the Supplier Code of Conduct is referenced within contractual documentation with certain suppliers.</p>
Statement of Values	Sets out the values that IPH expects its employees and partners, including suppliers, to commit.
Code of Ethics and Professional Conduct	Reflects and reinforces the values which underpin the operation of the Group.
Anti-Bribery Policy	Provides information and guidance on the Group's position on bribery and corruption in the jurisdictions in which we operate.
Sanctions Policy	Sets out how the Group complies with relevant sanctions laws.
Whistleblower Policy	<p>A practical tool for helping IPH and its member firms identify non-compliant conduct that may not be uncovered unless there is a confidential and secure means for disclosing such conduct. The Whistleblower Policy is also available to suppliers, contractors, consultants and service providers.</p> <p>No incidents related to modern slavery were raised through our whistleblower channels during FY24.</p>

4.2. Supplier due diligence

As noted above, during FY24 we continued to conduct due diligence to assess the modern slavery risks that exist across the Group's supply chains and continued to conduct a modern slavery risk assessment to understand our potential risks and exposure to modern slavery practices. This will continue into FY25 and beyond.

4.3. Employee communication

During 2024, IPH made all Group staff aware of modern slavery risks and related policies and processes via a Group-wide communication on modern slavery and the Group's efforts to reduce modern slavery risks and combat modern slavery practices.

5. Assessment of the effectiveness of our actions

The Modern Slavery Working Group continues to coordinate the approach taken across the Group with respect to the management of modern slavery risks. This includes assessing the effectiveness of the actions taken by IPH to date by, for example, continuing to conduct due diligence of suppliers' willingness and commitment to combat modern slavery, including suppliers' compliance with the Group Supplier Code of Conduct.

IPH will continue to develop specific processes to assess the effectiveness of the actions it has taken, and will continue to take, to address modern slavery risks.

Looking ahead

In the next financial year ending 30 June 2025, the Group aims to:

- > continue to assess and monitor modern slavery risk across the Group's operations and supply chains using appropriate systems and tools;
- > continue the distribution of the Group Supplier Code of Conduct to all Group suppliers and work to verify that higher risk suppliers are complying with the Supplier Code of Conduct; and
- > roll out tailored modern slavery training to relevant Group staff involved in the selection and engagement of suppliers.

6. Consultation and approval process

In preparing this year's Statement, the Modern Slavery Working Group engaged and consulted across the Group with respect to the Group's commitments and approach to tackling modern slavery risks.

Engagement and consultation included:

- > socialising modern slavery policies and frameworks across the Group to support the implementation of the Group's approach to modern slavery management;
- > collaborating with the leaders of our member firms as well as various levels of management within the member firms to provide an overview of the Act's reporting requirements and associated risk assessment and management activities, including those related to modern slavery risks;
- > working with the Executive Risk Committee and the Audit and Risk Committee to discuss the identification and management of risks generally across the Group, including modern slavery risks; and
- > seeking feedback from internal stakeholders to help inform this Statement.