California Transparency in Supply Chains Act and UK Modern Slavery Act Statement

Broadridge is committed to combatting slavery and human trafficking in its operations and supply chains. To that end, Broadridge has adopted this Human Rights Statement of Commitment (this "Statement") to explain the steps it takes to monitor and eliminate the use of or participation in slavery or human trafficking throughout its business. Broadridge has prepared this Statement in compliance with both the California Transparency in Supply Chains Act and the UK Modern Slavery Act, reflecting the Company’s unified approach to compliance and common policies relating to slavery and human trafficking in its operations. The principles and requirements set forth in this Statement are incorporated into the contractual relationships with suppliers and other business partners, and Broadridge expects its suppliers and business partners to comply with the expectations and requirements set forth herein.

Broadridge provides the following summary of its efforts to responsibly manage its operations and supply chains.

Verification. Broadridge requires suppliers to respond to a survey to verify their awareness of Broadridge’s commitment to combatting slavery and human trafficking in its operations. The survey also asks suppliers to describe what actions they take to monitor and combat slavery and human trafficking in their own operations and the operations of their suppliers. Upon receipt of suppliers’ responses, Broadridge retains the right to follow up and investigate any answers that are ambiguous or which fall beneath Broadridge’s rigid standards.
Auditing. Broadridge reserves the right to conduct audits of suppliers to determine suppliers’ compliance with Broadridge’s mandatory prohibitions on slavery and human trafficking. Any supplier that fails the audit will be advised why they failed and instructed on what is needed to become or remain a Broadridge supplier. Audits may be conducted by Broadridge or a third-party consultant and be announced or unannounced. Broadridge views the auditing process as a way to collectively improve operations rather than a means of terminating supplier relationships, and the Company is committed to working with suppliers to meet Broadridge’s expectations regarding human rights, slavery, and trafficked labor.

Certification. Suppliers for Broadridge must certify that, at a minimum, materials used and/or incorporated into any product purchased comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Suppliers must also certify compliance with Broadridge’s own requirements, which are set forth in this Statement and Broadridge Vendor Code of Conduct, as a material condition of the business relationship.

Internal Accountability. Broadridge requires its employees to follow this Statement. Employees that fail to comply may be subject to counseling, training, and/or disciplinary action. Broadridge’s contractors are also required to follow this Statement and Broadridge Vendor Code of Conduct, and they may be subject to remedial action and/or penalties for noncompliance.

Accountability/Training. Broadridge provides annual training to all associates, temps, contractors, and individuals who have direct responsibility for supply chain management, to understand and comply with its commitment on human trafficking and slavery. Associates, temps, and contractors who fail to comply may be subject to counseling and/or disciplinary action up to and including termination.
Approved by the board of Directors of Broadridge Analytics Solutions Limited and Broadridge Financial Solutions Limited on 2 February 2024

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