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# Anti-Slavery & Human Trafficking Policy

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## Anti-Slavery & Human Trafficking Policy

### Bravura Solutions Limited and its subsidiaries (the Company)

## 1. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced labour, debt bondage, forced marriage, human trafficking and the worst forms of child labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We expect the same high standards from all our contractors, suppliers and other business partners.

As a Company, we have a responsibility to take a robust approach to slavery and human trafficking and are absolutely committed to mitigating risks of slavery and human trafficking in our operations and supply chains. This involves identifying, assessing and addressing modern slavery risks to our business. We are also committed to ensuring there is transparency in our approach to tackling slavery and human trafficking.

Whilst the risk of modern slavery in our business may be low given the nature of services we provide, we must be vigilant in our dealings with both clients and suppliers. There is no place for modern slavery in our communities or in the global supply chains in which we operate. We have a responsibility to identify and address modern slavery risks that may be present in the commercial ecosystem in which we operate.

Furthermore, taking action to combat modern slavery also makes good business sense. By taking action to combat modern slavery in our operations and supply chains, we can protect against possible business harm and improve the integrity and quality of our supply chains. We can also increase profitability, investor confidence and access to financing opportunities.

We shall endeavour to:

- (a) conduct risk assessments to determine which parts of our business and which of our supply chains are most at risk from modern slavery so we can focus our efforts on those areas most 'at risk';
- (b) where appropriate, engage directly with new suppliers in respect of this policy to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their businesses;
- (c) incorporate specific prohibition against modern slavery in our contractual documentation; and
- (d) make provision for our contracted suppliers to hold their own suppliers to the same standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, consultants and business partners (**Personnel**). This policy does not form part of any employee's contract of employment and we may amend it at any time.

Please refer to our Modern Slavery Act Statements in the Corporate Governance section of our website, located at <https://investors.bravurasolutions.com/investor-centre/?page=corporate-governance> which sets out how we assess potential modern slavery risks and what steps we put in place to address such risks. This statement is reviewed and updated annually with approval from the board of directors.

## 2. Responsibility for the policy

The board of directors has overall responsibility for ensuring this policy supports compliance with our legal obligations. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

## 3. Our commitment

We prohibit and will not tolerate any Personnel engaging in, permitting, or inducing any form of modern slavery. Personnel are expected to report known or suspected instances of modern slavery in our operations and supply chain as set out in section 4

of this policy. In addition, contractors and suppliers are expected to identify and address any instances of modern slavery in their own operations and supply chains.

## 4. Compliance with the policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains requires the cooperation of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the compliance officer or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our operations or any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance officer.

We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising your concern. If you believe that you have suffered any such treatment, you should inform the compliance officer immediately. If the matter is not remedied, and you are an employee, you can raise it formally using our Grievance Procedure.

We may perform investigations or audits to verify that Personnel are complying with this policy. All Personnel are required to cooperate with any such investigations fully and promptly.

## 5. Communication and awareness of this policy

All employees will be made aware of this policy and it will form part of the induction of all new starters. This policy and our zero-tolerance approach to modern slavery must also be communicated to all suppliers, contractors, business partners and other Personnel by the relevant stakeholders.

## 6. Breaches of this policy

If breaches of this policy are identified involving instances of modern slavery, we may take steps or request that Personnel or organisations working on our behalf take steps to remediate the adverse impacts of the harm identified.

Employees who breach this policy may face disciplinary action, up to and including termination of employment, including for serious misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 7. Other matters

### 7.1 Amendment of policy

This Policy can only be amended with the approval of the Board. This Policy is subject to ongoing review and may be amended, replaced or revoked at any time by the Board in its absolute discretion.

### 7.2 Adoption of Policy and Board review

This Policy was reviewed and adopted by the Board on the date on the front cover of this Policy, and takes effect from that date and replaces any previous policy in this regard.

The Board will review this Policy periodically to check that it is operating effectively, appropriately reflects how whistleblowing matters are managed by the Company, and to consider whether any changes are required to the Policy.

### **7.3 Questions**

If you have any questions arising from the Policy, please contact the Company Secretary.