

Modern Slavery Act Statement

Introduction

This statement sets out Bravura Solutions (UK) Limited's and its UK affiliated companies' ("Bravura") actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Bravura recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

Bravura is a supplier of software and related services to financial services institutions. Specifically, for the administration of superannuation, pensions, life insurance, investment, wrap, private wealth and funds administration. Bravura considers that the risk of slavery or human trafficking in its business and supply chains is low due to the nature of the services it provides and the level of skill required from its workers and sub-contractors.

Further details about what we do can be found at the "About" tab on our website located at: <https://bravurasolutions.com/>.

In 2022, Bravura has received Living Wage Foundation Accreditation. The Living Wage Foundation is an organisation in the UK which aims to persuade employers and their supply chains to pay a Living Wage. This means we are committed to paying all our people at least the Living Wage. This includes personnel on temporary contracts and workers at our premises, who are contracted through our suppliers. This is particularly relevant to areas that are more vulnerable to modern slavery and human trafficking such as security, catering and cleaning personnel.

Relevant policies and responsibility

Bravura operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Anti-Slavery and Human Trafficking Policy.** Bravura is committed to acting ethically and with integrity in all our business dealing and to ensure that modern slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains. We encourage employees and contractors to report any suspected activities which breach the policy.
- **Whistleblowing training and policy.** We are committed to ensuring our employees are aware of the issue of modern slavery and can identify its indicators and risk factors. We ensure employees with procurement responsibilities understand the risks of modern slavery and human trafficking in our supply chains. Bravura encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees are expected to report suspicious activity to HR, whistleblowing protection officers or anonymously through a third-party system. Employees undertake annual mandatory whistleblowing training and our whistleblowing reporting procedure is signposted to employees.

- **Employee code of conduct.** Bravura's code makes clear to employees the actions and behaviour expected of them when representing the organisation. Bravura strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

All policies are approved by the Board of Directors and reviewed annually as part of Bravura's compliance program.

Pre-employment screening

Any employment offer made by Bravura is subject to a successful background check being carried out. The following criteria are examined:

- Proof of residence;
- Last 5 years employment references;
- Confirmation of eligibility to work in relevant country;
- Credit check (for finance employees and director level hires);
- Criminal record check;
- Professional and educational authentication.

The future

Bravura re-examines the statement contained herein annually to consistently combat slavery and human trafficking. In conjunction with adhering to this document Bravura intends to work together with our various suppliers to ensure they reflect the same levels of commitment as Bravura.

Board approval

This statement has been made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Bravura board of directors, who will review and update it annually. It constitutes our modern slavery and human trafficking statement for the financial year ending 30 June 2022.

Director's signature:

A handwritten signature in blue ink, appearing to read 'Nigel Liddell', written over a horizontal line.

Nigel Liddell

Date: 15th July 2022