

## 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 Solutions Limited and its Australian entities ("Bravura Australia") are now subject to the Modern Slavery Act 2018 (Cth) in force in Australia. Bravura Australia will address the Australian legislation in its annual modern slavery statement for the financial year ending 30 June 2020 in accordance with the requirements of the Australian legislation.

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 due to the nature of the services it provides, and the level of skill required from its workers and sub-contractors, that the risk of slavery or human trafficking low.

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

### 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.** The organisation 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 policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the 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.
- **Employee code of conduct.** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation 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.

### **Preemployment 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;  
Criminal record check;  
Professional and educational authentication.

### **The future**

Bravura intend to periodically re-examine the statement contained herein to consistently combat slavery and human trafficking. In conjunction with adhering to this document Bravura intend 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 2019.

### **Director's signature:**

A handwritten signature in black ink, appearing to be 'Tony Klim', written in a cursive style.

Tony Klim

**Date: 31<sup>st</sup> January 2020**