

MODERN SLAVERY ACT STATEMENT

INTRODUCTION & PURPOSE OF STATEMENT

This statement is made by **Synechron**, and its relevant subsidiaries,¹ all collectively hereinafter referred to as “**Synechron**”, “**the Company**”, or “**us**” pursuant to the Modern Slavery Act 2015 in the UK and the Modern Slavery Act 2018 in Australia, for the financial year ending 31 March 2023. Synechron is committed to uphold human rights and the steps we have undertaken to seek to ensure that slavery and human trafficking do not occur within our business or our supply chain.

In preparing this statement, we have consulted with functions within, or centralised group functions which support, all relevant subsidiaries. This was carried out through discussions relating to modern slavery risks, implementation of relevant policies and processes within these entities, as well as by means of direct input into this document.

Accordingly, our consultation with the individuals within these functions constituted consultation with each of the relevant subsidiaries.

OUR BUSINESS

Synechron is an information technology and consulting company focused on the financial services industry, including capital markets, insurance, banking, cards & payments and digital. Synechron is a value-driven company, delivering industry-leading digital solutions to transform and empower businesses. We aspire to meet high professional, legal, and ethical standards. Given the nature of the services we provide, our locations of operations and the professional workforce we employ, we assess the risk of modern slavery or human trafficking in our own organisation and supply chains to be low.

Synechron supports the elimination of all forms of forced & compulsory labour, and the effective abolition of child labour, in line with internationally proclaimed human rights including the International Bill of Human Rights and the principles concerning fundamental rights in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.. We seek to ensure that there is no modern slavery or human trafficking occurring in our supply chains or in any part of our business.

OUR SUPPLY CHAIN

We have classified our suppliers into three major categories:

- ❖ **Suppliers of workforce:** This covers our contractors who work on our campuses/client projects and support our business globally.

¹ For the purposes of the UK Modern Slavery Act 2015, the relevant subsidiary is Synechron Limited. For the purposes of the Australian Modern Slavery Act 2018, the relevant subsidiary is Synechron Australia Pty Ltd.

- ❖ Suppliers of Services: This covers our vendors who provide essential services such as (catering, food and beverage counters, transportation, facilities & administration) on our campuses.
- ❖ Suppliers of Goods: This covers our partners who supply products (such as IT hardware, software, electronic equipment, furniture, stationery) to us.

POLICIES AND PROCESSES

We seek to ensure that there is no modern slavery or human trafficking in our supply chain or in our business. Our internal policies, which are available to our employees in the UK [and Australia], reflect our aims to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain. We have a formalized Code of Conduct and Ethics policy that is available on our company's intranet portal which lay down the expectations that we have from our employees and suppliers/vendors in the conduct of business activities globally. We do not utilise child labour (as defined by the International Labour Organization) at any of our workplaces through any form of work. We do not forfeit any immigration documents (like passport, visa, work permit, employment authorization document etc.) which are required by an employee to perform his/her duties at offsite workplace locations.

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Synechron has a zero-tolerance approach to modern slavery and are committed to acting ethically with integrity and transparency in all business dealings and relationships, consistent with its obligations under the Modern Slavery Act 2015 and Modern Slavery Act 2018.

These expectations apply to all individuals working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners. We also expect the same high standards from all of our suppliers, contractors and other business partners.

RISK ASSESSMENT AND MANAGEMENT

Risks within our business

We operate in the professional services sector, and while we do not consider this to be a high risk industry for modern slavery practices, we nevertheless continue to be mindful of the possible risks and implement appropriate measures to combat these.

Management of Risks associated with business, including Diligence Undertaken

Recruitment of staff

As part of our recruitment process for employees and partners, we carry out checks prior to any person joining our Company. Our Recruitment team looks for potential red flags for modern slavery and follows up on any irregularities which may indicate that there is an issue. The pre-screening of individuals is carried-out by a specialist independent screening provider, who performs identity checks, reference checks, right to work checks, criminal record checks, and where applicable education and professional qualification checks. We also perform background checks in relation to contractors that we work with, which helps reduce the risk of modern slavery in this context.

Fair pay for staff

We are committed to ensuring that all of our people are paid fairly. We ensure that all of our employees are paid at least the applicable minimum wage. We also seek to ensure that all staff of our suppliers who provide on-site services in our offices are paid at least the minimum wage, including those in cleaning and maintenance services, which we have identified as areas of our supply chain that are at a higher risk of modern slavery.

Risks within our supply chain

As a Company in the professional services sector, we consider that our most significant risks in relation to modern slavery relate to our supply chain. We are therefore focused on working with our suppliers to seek to ensure modern slavery plays no part in their business.

Management of risks associated with supply chain

Evaluating suppliers

As part of our responsible supply chain efforts, we undertake the following:

- We have a Code of Conduct and Ethics in place which is applicable to our suppliers/vendors.
- We circulate a questionnaire, which includes questions on compliance of Human Rights and prohibition on child labor by the suppliers/vendors, prior to onboarding suppliers/vendors. To the extent that the supplier does not comply with the Human Rights and prohibition on child labour provisions, we terminate the onboarding process and do not work with that supplier/vendor.

- Our standard supplier agreements require our suppliers to comply with local laws, including modern slavery laws. We seek to build long-standing relationships with local suppliers and make clear our expectations of business behavior.
- We always strive to ensure that slavery and human trafficking is not taking place within the operations of our business partners and do not tolerate such activities if discovered in our supply chain.. For example, we prohibit our suppliers from withholding the immigration documents (like passport, visa, work permit, employment authorization document etc.) of their workers.
- Our payments to the suppliers/vendors are always as per the stipulated minimum wages as per local laws. In our non-India locations, we undertake checks to comply with the requirements of local law in our supply chains.

We have a global hotline in place that allows our employees to raise concerns relating to potential violations of laws and the Company's policies.

ONGOING STEPS

Modern Slavery is a complex challenge which requires ongoing, evolving and continually improving efforts. We remain committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We will use the following key performance indicators to help us sustain our efforts and measure the effectiveness of the steps undertaken to remove modern slavery and human trafficking from our supply chains:

- Working with our suppliers to acknowledge and socialize the Code of Conduct and Ethics.
- Providing information to support staff on our campuses on their rights, including relating to sexual harassment.
- Periodic checks by our internal team along with remedial action.
- Reviewing issues raised through our grievance redressal mechanisms and initiating corrective action.

We will continue to identify ways to improve employee and supplier awareness of our commitment to respect human rights and efforts to prevent modern slavery and human trafficking.

This statement was approved by the Board of Synechron Australia Pty. Ltd. on 30th day of April 2024.



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