



ISMS Annex A

Modern Slavery Policy

Issue Date: 29th May 2020

Issue Number: 3

Confidentiality Level: Public

POLICY STATEMENT

Annex A reference

A.11.1.5 Working in secure areas

Statement:

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that StarCompliance has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. StarCompliance has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business:

StarCompliance is a leading provider of compliance and regulatory solutions for the financial services industry. We provide compliance software with a focus on global regulations including, but not limited to, SEC, FINRA, FCPA, FCA, UK Bribery Act, and MiFID regulations. Our solutions provide an entirely configurable platform that manages the complex and burdensome processes associated with managing employee conflicts of interest, connecting all areas, and providing a 360-degree view of all employee activity and behaviour.

StarCompliance is privately owned and managed, since 1999 and holds ISO 9001 and ISO 27001 certifications. The company has operations in the United Kingdom and the United States. Our in-house R&D team is continuously developing compliance solutions to meet the ever-changing regulatory landscape faced by large global organizations. We provide our Clients with an integrated and streamlined compliance process for managing, preventing, detecting, reporting, enforcing, and resolving employee conflicts and risk surveillance activities through a single application.

We understand the ever-changing regulatory and political impacts and the problems that must be solved for our Clients to manage their day-to-day operations, such as:

Reduction of labour and costs associated with time and staff-intensive processes.

Mitigation of operational and reputational risk.

Centralization of Compliance functions as a well-formed process.

Adherence to existing regulatory obligations and preparation for potential regulatory reforms.

Our High-Risk Areas:

StarCompliance high risk areas are third party suppliers.

Our Policies:

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Anti-slavery policy. This policy sets out the organization's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK and US, checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Code of business conduct. This code explains the way we behave as an organization and how we expect our employees and suppliers to act.

Our Suppliers:

StarCompliance operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organization has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

They have taken steps to eradicate modern slavery within their business.

They hold their own suppliers accountable over modern slavery.

For UK based suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate).

For international suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations

We may terminate the contract at any time should any instances of modern slavery come to light.

Training:

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our Performance Indicators:

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

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Approval of this Statement:

This statement was approved by StarCompliance Inc.

Name: Dale Sanders – Director, Technical Operations

Signature

Dale Sanders

Date: 29th May 2020