

Issue Date: 14th July 2023
Issue Number: 2.0
Confidentiality Level: Public



Modern Slavery Policy

Issue Date: 14th July 2023

Issue Number: 2.0

Level: Public

Issue Date: 14th July 2023
Issue Number: 2.0
Confidentiality Level: Public

1. Introduction

This statement sets out StarCompliance's 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. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

We recognise that the risk of modern slavery exists across our business, in the United States of America, United Kingdom and all other markets where StarCompliance operates. We have a responsibility to take a robust approach to slavery and human trafficking and we continue to take that responsibility very seriously.

StarCompliance 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.

2. 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 organisations. 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.
- Centralisation of Compliance functions as a well-formed process.
- Adherence to existing regulatory obligations and preparation for potential regulatory reforms.

Issue Date: 14th July 2023
Issue Number: 2.0
Confidentiality Level: Public

3. Responsibility for the policy

StarCompliance has overall responsibility for ensuring this statement complies with our legal and ethical obligations, and that all those under our control comply with it. StarCompliance has responsibility for implementing, monitoring its use and the efficacy of this statement. StarCompliance has responsibility for any queries regarding this statement and auditing internal compliance procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring employees reporting to them understand and comply with this policy.

4. Our High Risk Areas

StarCompliance has identified that our high risk area are our third party suppliers.

4.1. Third Party Suppliers

Managed by our Information Security team, we undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence process includes understanding the controls our third party suppliers have in place to prevent their company, subcontractors and their own suppliers engaging in all forms of forced labour, child labour and human trafficking internally and throughout their supply chain.

StarCompliance will invoke sanctions against suppliers that fail to meet the requirements of this policy. Third party suppliers who seriously violate our modern slavery policy or supplier code of conduct will lead to the termination of the business relationship.

5. Relevant Policies and Procedures

5.1. Whistleblowing Policy

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, StarCompliance. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. In the event of any allegations under this policy, these will be thoroughly investigated by a member of the Risk, Governance & Compliance Committee, the Director of Human Resources or a member of the Human Resources team.

5.2. Code of Ethics and Business Conduct

Managed by line managers and supported by the Human Resources team, our code of Ethics & Business Conduct makes clear to employees the actions and behaviour expected

Issue Date: 14th July 2023
Issue Number: 2.0
Confidentiality Level: Public

of them when representing StarCompliance. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

5.3. Supplier Code of Conduct

Managed by the Information Security team, we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to undergo assessments to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

5.4. Recruitment Policy

Our Talent Acquisition team are responsible for ensuring we use only specified, reputable employment agencies to source labour. As part of this working practice, it is required for employment agencies to verify a potential candidates identity, right to work and verify gaps in employment.

5.5. Pre-Employment Screening

Our Human Resources team are responsible for ensuring that the pre-employment screening procedures are conducted, including eligibility to work for all employees and background checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

6. Performance Indicators

We have reviewed our key performance indicators (KPIs). We will know the effectiveness of our 2023 Modern Slavery Policy if:

- There are no reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified either at StarCompliance or in our supply chains.
- All employees working in at StarCompliance have read and attested to this policy.
- All suppliers to StarCompliance will have been appropriately vetted to ensure there no indication of modern slavery practices within their business operations or supply chains.

Issue Date: 14th July 2023
Issue Number: 2.0
Confidentiality Level: Public

7. Executive Committee Approval

This statement was approved by StarCompliance Operating, LLC. This policy will be revised annually.

Name: Lang Leonard

Role: CFO

Signature: 595407BF8D324F9...

8. Policy Review and Approval:

REVIEW		DETAILS		
Review Frequency		Annual, or if a significant change to the business area occurs.		
VERSION	APPROVAL DATE	NAME	ROLE	COMMENTS
2.0	28 th July 2023	Stephen Marston	Associate Director, Human Resources	2023 policy updated format and signature