

## **Slavery and Human Trafficking Statement of Finastra International Limited, Finastra Global Limited and Finastra UK Limited for the financial year ending 31 May 2023**

This statement is made pursuant to the Modern Slavery Act 2015. It sets out the specific actions taken by any subsidiary or affiliates of Finastra International Limited, Finastra Global Limited and Finastra UK Limited (together “**Finastra**” or the “**Group**”) to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our own business.

### **Organisation’s structure and business**

Finastra operates globally to develop, manage and license a variety of software solutions and software-related services to its customers in the financial services industry.

Finastra is a trusted partner to 45 of the world’s top 50 banks and has a global scale and reach, with approximately 8000 full-time employees serving clients of all sizes across 130 countries.

### **Supply Chain**

Finastra operates in a sector which is at relatively low risk of slavery, unlawful child labour or human trafficking existing within the business. Finastra considers its main suppliers to be at low risk of engaging in practices of modern slavery and human trafficking. The Group remains committed to prevent the occurrence of any practices both in the business and in the supply chain.

### **Policies**

We remain steadfast in our commitment to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Code of Conduct & Business Ethics (the “**Code of Conduct**”) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Finastra has continued to formally adopt measures to assess its supply chain, including a third-party risk management assessment and audit process. Finastra reserves the right to terminate its relationship with any non-compliant supplier. Our third-party conduct terms include a warranty that all third parties need to comply with all applicable laws, regulations and policies relating to slavery and human trafficking.

At Finastra, our ethical standards are laid out in our Code of Conduct. The Code of Conduct creates a universal standard that governs not only how we expect our employees to behave with each other, but also how our customers, partners, and other stakeholders can expect to be treated by Finastra.

The Environment, Social & Governance (“**ESG**”) strategy continues to form an important part of the culture journey of Finastra. Finastra’s Board of Directors has overall accountability for setting the strategic direction and ultimately for ESG performance, risk management, and compliance with stakeholder commitments and obligations. Additionally, the Board makes recommendations on how Finastra’s policies, practices and disclosures can adjust to, or address current trends. At the executive management level, Finastra’s ESG Executive Committee comprises key executive and functional leaders and is co-chaired by the CEO and the SVP of Strategy, ESG and Chief of Staff. The Committee drives the strategy, direction and oversight of sustainability throughout the company and promotes ESG awareness by providing leadership and support for ESG activities. In addition, it assesses progress on key ESG initiatives across the organization and reports to the Finastra Group Board each quarter on the status of the ESG program.

Finastra has appointed an ESG team, headed by the SVP of Strategy, ESG and Chief of Staff, tasked with driving forward a vision for ESG which is delivered via our programs across our three ESG pillars of our environment mission, social equity, and principles of governance.

Finastra has a Speak Up (whistleblowing) program in place which monitors and responds to whistleblowing reports from employees and reports from third parties to ensure that modern slavery and human trafficking is not occurring within its business or supply chain. To facilitate reporting, a number of avenues are available for employees and third parties to anonymously raise concerns, which are then investigated.

**Due Diligence and Risk Assessments**

Finastra carries out due diligence on any potential suppliers. Finastra continues to monitor, assess and manage risks on an on-going basis in accordance with its risk management framework. We expect our third-party service providers to adhere to the same high standards Finastra has set for the organisation.

**Training**

Finastra carries out regular staff training through online courses. The Group continues to review training options and content so as to ensure appropriate awareness of modern slavery and human trafficking issues.

All employees are required to complete the Code of Conduct & Business Ethics training as part of their induction programme, and annually thereafter.

**Approval**

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ended 31 May 2023 and will be reviewed and updated for each financial year.

This statement has been approved by the Board of the directors of Finastra International Limited, Finastra Global Limited and Finastra UK Limited respectively, on 21<sup>st</sup> November 2023.

Simon Dowler  
Director