Modern Slavery and Human Trafficking Statement

Introduction

Confluence Technologies, Inc. ("Confluence") operates responsibly and sustainably, maintaining the highest standards of ethical conduct. We have a zero-tolerance approach to modern slavery and human trafficking in our operations and supply chain.

This Modern Slavery & Human Trafficking Statement (this "Statement") is made in accordance with relevant legislation, such as Section 54(1) of the Modern Slavery Act 2015 and Section 16 of the Australia Modern Slavery Act 2018.

This Statement applies to all companies within Confluence that are required to have a modern slavery statement in accordance with applicable legislation. This Statement covers the financial year ended 31 December 2023.

Our Business and Supply Chain

Confluence is a global technology solutions provider delivering innovative products to the worldwide money management industry to meet asset managers and service providers' performance, reporting, analytics, risk, and data needs. Confluence offers its clients a broad range of data-driven managed investment solutions. Headquartered in Pittsburgh, PA, Confluence services over 1300 clients in 41 countries, with locations across Europe, North America, Africa, Australia, and Asia.

Confluence is committed to promoting and maintaining the highest standards of ethical conduct. Our supply chain spans multiple jurisdictions, and we are committed to responsible sourcing and to identifying and addressing any risks related to labor practices and human rights within our business operations and supply chain.

Risk Assessment

As a financial services and technology company, Confluence believes that it operates within an industry with a low risk of supporting or encountering slavery or human trafficking, based on the nature of the relevant products and services as well as the locations of its significant operations.

Additionally, Confluence's supply chains are limited. Generally, we procure computer equipment as well as office supplies, equipment, and services for the daily running of our businesses. In addition, we use third-party vendors and contractors for technology support and development and for various advisory services.

Confluence does not manufacture or sell any physical goods and, therefore, has no supply chain relating to such activities. While we believe our operations are low risk for violations of human rights, modern slavery, and human trafficking legislation, this does not lessen our commitment to due diligence.

Policies, Governance, and Practices

Notwithstanding our low risk for supporting slavery or human trafficking, we are committed to essential ethical standards and mandate compliance with the laws and regulations in the jurisdictions where we operate and respect the human rights of others.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls designed to ensure slavery or human trafficking is not taking place anywhere in our business or supply chains. Our corporate policies incorporate the principles of the United Nations Global Compact. Our Code of Conduct outlines our commitment to ethical behavior and responsibility. Governance mechanisms, including oversight by our Board of Directors and senior leadership, help to enforce these principles.

Employees

Our commitment to eradicating modern slavery extends to our own employees. We provide fair labor conditions, adhere to local and international labor laws, and respect the freedom and dignity of all our workers. Any form of forced or involuntary labor within our operations is strictly prohibited. We strive to create an inclusive and supportive work environment where employees feel empowered to report any concerns without fear of reprisal.

Reporting and Whistleblowing

We encourage a culture of openness and have established a confidential whistleblowing mechanism. Reports of suspected instances of modern slavery can be made anonymously and will be rigorously investigated. Retaliation against anyone reporting concerns is strictly prohibited.

Future Commitments and Collaborations

We are committed to continual improvement and are actively seeking opportunities for collaboration with like-minded organizations and governmental bodies. We will regularly review and update our policies and initiatives to ensure their effectiveness in combating modern slavery.

Approval and Review

This statement will be reviewed annually and updated as necessary. It has been approved by our Board of Directors.