

Confluence Technologies Inc.
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United States

Modern Slavery and Human Trafficking Statement

Financial year ended 31 December 2024

Introduction

This Modern Slavery & Human Trafficking Statement (this “Statement”) is made by Confluence Technologies, Inc. (“Confluence”) pursuant to Section 54(1) of the Modern Slavery Act 2015. This Statement covers the financial year ended 31 December 2024 and describes the steps taken by Confluence in respect of business carried on in the United Kingdom. Where relevant, this Statement also describes steps taken within entities that Confluence owns or controls.

Our Business

Confluence is a global software and data solutions provider to the investment management industry. We deliver products and services that support performance, reporting, analytics, risk, and data needs for asset managers and service providers. Headquartered in Pittsburgh, Pennsylvania, we serve over 1300 clients in over 40 countries, with locations across Europe, North America, Africa, Australia, and Asia.

Our Supply Chains

Our supply chains are typical of a technology and services company. We procure enterprise software and cloud services, professional services and contractors, facilities and office services, and IT hardware. Confluence does not manufacture or sell physical goods.

Respect for Human Rights

We are committed to treating colleagues, contractors, and business partners with dignity and respect, providing safe working conditions, and complying with the laws of the jurisdictions where we operate. Our expectations are communicated through our Code of Conduct and our global speak-up channels.

Risk Assessment

Given the nature of our products and services and the locations of significant operations, we assess our inherent risk of modern slavery and human trafficking as lower than sectors such as manufacturing or extraction. Our supply chains are limited in scope and relate primarily to technology and business support. Areas that can present elevated risk include the use of contractors and contingent labour in certain jurisdictions, multi-tier hardware supply chains, and locally procured facilities services. We review these areas periodically using available supplier information and market insights, and we escalate concerns for follow-up and remedial action where appropriate.

Policies, Governance, and Practices

We are committed to ethical standards and mandate compliance with applicable laws and respect for human rights. Our policies reflect a commitment to acting with integrity in our business relationships and to maintaining systems and controls designed to reduce the risk of modern slavery or human trafficking in our business or supply chains. Our corporate policies incorporate principles of the United Nations Global Compact. Our Code of Conduct sets out expected behaviours and responsibilities. Governance mechanisms, including oversight by our Board of Directors and senior leadership, support these principles.

Employees

We provide fair labour conditions, adhere to local and international labour laws, and respect the freedom and dignity of all workers. Any form of forced or involuntary labour within our operations is prohibited. We aim to maintain a workplace where concerns can be raised without fear of reprisal.

Reporting and Whistleblowing

We encourage a culture of openness and maintain confidential channels for raising concerns. Reports of suspected instances of modern slavery or human trafficking can be made anonymously where permitted and are reviewed and, where appropriate, investigated. Retaliation against anyone reporting concerns is prohibited.

Approval and Review

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