

Confluence Technologies Inc.

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United States

Modern Slavery and Human Trafficking Statement

Financial year ended 31 December 2025

Introduction

Confluence Technologies, Inc. ("Confluence") is committed to operating in a responsible and sustainable manner and to maintaining the highest standards of ethical conduct. We take a zero-tolerance approach to modern slavery and human trafficking in all aspects of our business and supply chains.

This Modern Slavery and Human Trafficking Statement (this "Statement") is made in accordance with applicable modern slavery legislation, including, without limitation, Section 54(1) of the UK Modern Slavery Act 2015 and Section 16 of the Australian Modern Slavery Act 2018, in each case as amended from time to time.

This Statement applies to Confluence and any of its subsidiaries required to publish a modern slavery statement under applicable legislation.

Our Business and Supply Chain

Confluence is a global provider of enterprise data and software solutions for regulatory, analytics, and investor communications needs within the investment management industry.

Our operations primarily involve the development, delivery, and support of technology and data-driven software services. While Confluence does not manufacture or sell physical goods, our supply chain spans multiple jurisdictions and includes vendors providing technology infrastructure, data services and professional services.

We are committed to responsible sourcing and to identifying, assessing, and addressing risks related to labor practices and human rights within both our own operations and supply chain.

Risk Assessment

Based on the nature of our business and the jurisdictions in which we operate, Confluence considers its exposure to modern slavery and human trafficking risks to be relatively low. This assessment reflects, among other factors, our software and service-based operations, limited reliance on physical goods, and the profile of our global suppliers.

Notwithstanding this assessment, we recognize that modern slavery risks can arise in any business or supply chain. Accordingly, our low-risk profile does not diminish our commitment to appropriate due diligence and ongoing risk monitoring.

Policies, Governance, and Practices

Confluence is committed to conducting business ethically and in compliance with all applicable laws and regulations, including those relating to human rights. We maintain policies and procedures designed to promote integrity and to prevent modern slavery and human trafficking in our operations and supply chains. These include our Code of Conduct and related corporate policies, which incorporate principles aligned with internationally recognized frameworks such as the United Nations Global Compact.

Our governance framework, including oversight by our Board of Directors and Executive Leadership Team, supports the implementation and enforcement of these standards.

Employees

Confluence is committed to providing a fair, safe, and inclusive working environment for all employees. We comply with applicable labor and employment laws internationally and uphold the fundamental rights and freedoms of our workforce.

We prohibit any form of forced, bonded, or involuntary labor and promote a culture in which employees are treated with dignity and respect and feel empowered to raise concerns without fear of retaliation.

Reporting and Whistleblowing

We promote a culture of transparency and accountability and maintain mechanisms that allow employees and third parties to report concerns confidentially, including concerns related to modern slavery.

All reports are taken seriously, investigated appropriately, and handled in accordance with our policies, and retaliation against individuals who raise concerns in good faith is strictly prohibited.

Future Commitments

Confluence is committed to continuous improvement in its approach to identifying and addressing modern slavery risks. We will continue to review and enhance our policies, procedures, and controls and, where appropriate, engage with industry groups and other stakeholders to strengthen our approach.

Approval and Review

This Statement is reviewed annually and updated as appropriate. It has been approved by the Board of Directors of Confluence.