

Modern Slavery Statement

Thought Machine modern slavery and human trafficking statement 2023

About Thought Machine

Thought Machine's modern slavery and human trafficking statement includes the steps the company has taken, and continues to take, to understand and minimise the potential risk of modern slavery in its business and supply chain.

This statement is published in line with section 54(1) of the UK Modern Slavery Act 2015.

Thought Machine is a financial technology company headquartered in London, focused on engineering; it employs over 500 people with offices in four countries. Thought Machine builds a next generation cloud native core banking platform and works with a wide range of banks and new digital banking propositions.

As a UK-headquartered financial technology company, with regional offices in the US, Singapore and Australia, Thought Machine operates in a sector and within regions that are at a relatively low risk of slavery, unlawful child labour or human trafficking.

Our commitment to the principles of the Modern Slavery Act 2015

to: ensure that all employees are legally entitled to work in relevant jurisdictions; and safeguard employees from any abuse or coercion. In addition, where possible, we perform thorough criminal and employment background checks on employees.

To ensure Thought Machine identifies wrongdoing, we have policies in place to ensure staff feel confident that they can expose misconduct without any risk to themselves and we have procedures for confidential whistleblowing.

Our supply chain

Due to the nature of our business, we mainly contract with suppliers where the chances of modern slavery are low (e.g. technology providers). Therefore, we assess ourselves to have a low risk of modern slavery in our business and supply chains. Regardless, Thought Machine has supply chain management procedures to mitigate the risks of modern slavery and human trafficking. In addition, we do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Our policies in relation to the Modern Slavery Act 2015

Thought Machine's Code of Conduct is available to all staff through the intranet, it contains provisions on:

- Our culture
- Harassment
- Diversity and inclusion
- Whistleblowing
- Modern slavery
- Bribery and corruption

We will continue to embed the Modern Slavery Act principles and:

ensure that modern slavery risks and prevention are considered in our supply chain;

ensure that the contract terms and conditions with suppliers include references to compliance with applicable legislative and regulatory requirements, such as modern slavery and human trafficking; and

continue to take action to embed a zero tolerance policy towards modern slavery and human trafficking.

This statement has been approved by Nitesh Palana, Thought Machine's Director of Risk and Compliance, for the financial year ending 31 December 2023.

This statement will be reviewed and updated every year.

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