



## MODERN SLAVERY ACT STATEMENT 2018

The United Kingdom's Modern Slavery Act 2015 ("MSA") requires:

- (a) companies carrying on a business in the United Kingdom (supplying goods or services);
- (b) companies which have an annual turnover of £36 million or more,

to publish an annual statement describing the steps they have taken to ensure that slavery and human trafficking are not occurring in any parts of the business or supply chain.

Below is the annual statement on behalf of the United Kingdom entities of the GBST group (GBST Ltd Company No. 00816145, GBST UK Holdings Ltd Company No. 06662908, GBST Hosting Ltd Company No. 06663152 and GBST Wealth Management Limited Company No. 06663089 ("GBST UK")) in satisfaction of this requirement.

### Business Structure

GBST UK is a provider of technology to the financial services industry through the GBST Composer, GBST Syn~ and GBST Shares platforms.

### Suppliers

The supplies that GBST UK procures for its business are mainly software related goods and services, travel and accommodation, the hiring of independent consultants and general office related engagements such as cleaning services and pest control. GBST UK sources these supplies from reputable suppliers who typically provide the goods and services themselves directly to GBST UK. The nature of the goods and services GBST UK requires do not demand the types of labour that are typically at risk for slavery and human trafficking, however GBST UK will continue to evaluate all engagements and will not continue to support a supplier if GBST UK is aware that slavery and human trafficking are taking place. In such circumstances, GBST UK will terminate the contract with that supplier as soon as possible.

GBST UK also uses reputable recruitment partners when sourcing employees and contractors or engages such employees and contractors directly.

### Code of Conduct

GBST's Code of Conduct sets out certain standards of conduct to aid directors, officers, employees and contractors in making legal and ethical decisions when acting on behalf of GBST and performing the day to day duties of their role. GBST's Code of Conduct contains reporting procedures, accountability provisions and disciplinary action (such as immediate termination) should the Code of Conduct be violated. Through the Code of Conduct and other GBST policies such as the Human Rights Policy, Diversity Policy and Bribery and Anti-Corruption Policy ("Policies"), GBST seeks to promote honest and ethical conduct, deter wrongdoing and support compliance with any laws and regulations which apply to GBST's business.

### **Training and Communications**

Directors, officers, employees and contractors first receive training in the Code of Conduct and associated Policies as part of the induction program when joining GBST UK.

### **Continual Review**

GBST UK recognises and understands the importance of the MSA, and GBST UK will annually review the risks in its supply chain and business. GBST UK is committed to acting ethically and with integrity in all business relationships and will look at whether any training on slavery and human trafficking needs to be provided to its directors, officers, employees and contractors. GBST UK is consistently looking at ways in which it can maintain and improve internal systems and processes to avoid acting complicitly in human rights violations related to its operations, suppliers and products.

A handwritten signature in black ink, appearing to read 'RDM', with a long horizontal flourish extending to the right.

**Robert DeDominicis**  
**Chief Executive Officer and Managing Director**