# SMARTSTREAM

**Policy Document**

## Modern slavery and human trafficking statement

# SmartStream Group Policy
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**Document Control:**

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# Change History

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| 20/01/2018 | 1.0 | Initial outline of document | Richard Bowler |
| 27/01/2019 | **2.0** | **Minor updates** | Richard Bowler |
| 21/01/2020 | **3.0** | **Minor updates** | Richard Bowler |
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## Document Control Standards:

| Version | Release | Example |
|---------|---------|---------|
| **n**.x.0 | Significant revision. | Significant update to structure or content; major re-release. |
| x.**n**.0 | External, incremental. | Baseline version for external review and sign-off. Will include one or more minor incremental revisions. |
| x.x.**n** | Minor revision. | Internal incremental revisions – may be released for external review but not for approval. |

**No hard copy of this document should be considered maintained (cross refer to the Risk & Compliance Knowledgebase for latest version).**

# Approval & Distribution

Amendments to this document are to be signed-off by the following:

| Name | Role |
|------|------|
| **Richard Bowler** | CFO |
| | |

This document is also distributed to the following for information:

| Name | Medium |
|------|--------|
| **Global Exec** | **Intranet** |
| **Board Members** | **Intranet** |

Contents

## 1. Introduction

This statement sets out SmartStream Technologies' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2020 to 31 December 2020.

As part of the financial software technology sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## 2. Organisational structure and supply chains

This statement covers the activities of SmartStream Technologies/ D Clear Europe Limited:

- SmartStream is a global software and managed services provider that operates in the Financial Services sector with an impressive base of more than 1,500 customers. This includes more than 70 of the world's top 100 banks alongside the world's leading asset managers, custodians and broker dealers.

**Countries of operation and supply**
- The organisation currently operates in the following countries:
    - Asia Pacific – Australia, China, and Singapore.
    - EMEIA - Austria, Dubai, France, Germany, India, Italy, Luxembourg, Netherlands, Switzerland, Spain, and the United Kingdom.
    - North America – Canada, and the United States of America
- The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

**High-risk activities**
- The organisation does not consider any activities as being at high risk of slavery or human trafficking.

**Responsibility**
Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies**: In conjunction with the business, the HR Department is responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments**: the Risk Management team is responsible for risk assessments of new and existing suppliers.
- **Investigations/due diligence**: The Risk Management responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training**: Guidance has been issued to supply chain managers to ensure that supply change managers are aware of their responsibilities under the act.

## 3. Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee conduct** The organisation makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Recruitment/Agency workers** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## 4. Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- using 3$^{rd}$ party databases and tools, for example the RiskScreen tool of KYC Global powered by Dow Jones - where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## 5. Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring supply chain managers to have completed training on modern slavery by 31 March 2016;
- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

## 6. Training

The organisation requires supply chain managers within the organisation to read and be aware of the requirements of the modern slavery act.

## 7. Awareness raising

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises/circulating a series of emails to staff.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

## 8. Board approval

This statement has been approved by the organisation's Board of Directors who will review and update it annually.

Richard Bowler
CFO

Date: 21.01.2020