

## **Modern Slavery Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of all companies within the Gresham Group, including Gresham Technologies plc, Gresham Technologies (UK) Limited, Gresham Technologies (US) Inc., Gresham Technologies (Australia) Pty Ltd, Gresham Technologies (Luxembourg) SA, Gresham Enterprise Storage Inc., C24 Technologies Limited, Inforalgo Information Systems Limited and Electra Information Systems Inc. This statement constitutes the Group's slavery and human trafficking statement for the financial year ended 31 December 2021. This statement was approved by the Board of Directors on 21 June 2022.

### **1. Introduction**

Gresham Technologies plc is committed to corporate sustainability and to a principled approach of doing business. We recognise that we have a duty to manage our business affairs and operations in a sustainable and responsible manner. We attribute the utmost importance to our corporate values and to our environment, social and governance (ESG) policies.

Our respect for human rights is guided by the principles set out in the United Nations Universal Declaration of Human Rights. We believe modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships.

We aim to ensure there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from our suppliers.

### **2. Our business and structure**

Gresham is a global software and services company specialising in providing solutions for data integrity and control, banking integration, payments and cash management in the financial services sector. As a Group, we have over 200 employees worldwide and serve more than 250 customers globally. We have offices in North America, UK, Europe and Asia Pacific. The Group had a global annual turnover of £37m in the year ending 31 December 2021.

Our business is organised into four primary business units:

- Sales & Marketing, responsible for business development and revenue generation. This includes direct sales, marketing and prospecting and development of partner channels.
- Customer Success, responsible for account management and service delivery through our network of professional services consultants and technical support engineers.
- Product Development, responsible for the whole development lifecycle process for our software products (including software-as-a-service) and product strategy.
- Business Operations, responsible for all internal functions including finance, information technology, people, facilities, legal, compliance and corporate affairs.

We currently have operations in the following countries:

- EMEA – UK, Luxembourg
- North America – United States of America (New York, Florida)
- Asia Pacific – Singapore, Malaysia, Sydney

### **3. Responsibility**

The Group's Legal department is responsible for putting in place and maintaining Gresham's modern slavery and human trafficking policies and procedures. Risk management, investigations and due diligence is the responsibility of the Risk Review Board. Training is managed by the People & Culture team.

### **4. Our policies**

We have policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in any part of our business or, to the best of our knowledge, in any part of our supply chain.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We also have a Human Rights Policy and a Whistleblowing Policy in place. We review our policies at least annually.

In the near future, we intend to introduce and maintain additional documents, including a Code of Ethics and Conduct, a Responsible Sourcing Policy, a Supplier Management Policy and a Supplier Code of Conduct, as part of our broader ESG programme. These documents will formalise and enhance our zero-tolerance approach to modern slavery and human trafficking.

## **5. Our suppliers**

Our supply chain is made up of suppliers who provide goods and services to the Group.

Our key suppliers include technology (software and hardware) vendors, financial services providers, professional advisors, insurance firms, recruitment agencies, as well as individual consultants, contractors and workers, whether acting directly or through an umbrella company.

We are committed to ensuring that our suppliers share our commitments and standards on modern slavery. As such, we do not work with suppliers who we know to be or have been involved in modern slavery or human trafficking.

Where possible as part of our contracting processes, we include specific prohibitions against any form of modern slavery or human trafficking, and we expect that our suppliers will hold their own suppliers to the same high standards.

As noted above, we intend to create a Responsible Sourcing Policy, a Supplier Management Policy and a Supplier Code of Conduct in the future, to formalise our commitments and expectations with respect to our suppliers.

## **6. Due diligence processes**

All new suppliers are reviewed and approved by our global Business Operations team prior to being engaged. Approved suppliers are subject to periodic review, depending on the perceived level of risk associated with it.

Our due diligence assessments are based on the perceived risk associated with the supplier, and may include a security review, legal review, financial review and/or a review of the supplier's modern slavery statement. In the future, specific due diligence requirements for suppliers will be defined in our Responsible Sourcing Policy and Supplier Management Policy.

## **7. Training and awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our people. In the future, we will ensure that individuals who have supplier management responsibilities receive specific training in respect of modern slavery and human trafficking risks.

## **8. Performance indicators and evolution**

Whilst we do not consider that any of our activities are at high risk of slavery or human trafficking, we firmly believe in the importance of embedding and evolving our practices and our approach to dealing with modern slavery and human rights. Gresham's key performance indicators in respect of modern slavery compliance are currently based on:

- Training and awareness for our people who are in key decision-making roles or who have supplier management responsibilities;
- Developing and maintaining a robust supplier management system, whereby:
  - potential suppliers are appropriately reviewed and approved prior to engagement; and
  - existing suppliers are appropriately re-evaluated periodically; and
- Developing a Code of Ethics and Conduct and additional policies as set out in this statement.

Ian Manocha  
Chief Executive Officer  
Gresham Technologies plc  
21 June 2022