



SYNECTICS SOLUTIONS LIMITED

MODERN SLAVERY ACT STATEMENT

Synectics Classification: Public



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Your comments are of great value to us in improving our computer systems, publications and services.

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This statement sets out the actions which Synectics Solutions Limited ('Synectics') has taken to understand all potential modern slavery risks related to its business and to put in place steps designed to ensure that no slavery or human trafficking exists either with Synectics' business or within its supply chain. This statement relates to actions and activities during the financial year 1 September 2023 to 31 August 2024.

Our Business and Supply Chain

Synectics was established in 1992 and now employs over 300 employees. We build complex data management and software products and offer managed services to clients for the purposes of the prevention and detection of fraud, financial crime and money laundering; regulatory compliance checks, identity verification and related risk management.

The software business sector is not considered one most at risk and we do not have intricate supply chains, multiple levels of contracting and subcontracting or partner with businesses based in impoverished regions of the world where labour laws are non-existent or not enforced.

Our Policies and Contractual Terms

We are committed to conducting ourselves honestly and with integrity, striving for fairness in everything we do, including how we treat our employees. We are committed to implementing and enforcing effective systems and controls to ensure that Modern Slavery and human trafficking is not taking place anywhere in our business or supply chains.

- We ensure that all of our staff are aware that they can confidentially report any concerns, including cases of unethical behaviour, and we will review every case that is reported and take appropriate action, in accordance with our Whistleblowing Policy.
- We have policies in place which ensure our employment practices mitigate the risks identified in the Modern Slavery Act 2015 (set out in our Company Handbook), including the following:
 - Employees are not subjected to any forced labour and have the freedom to terminate their employment at any time, without penalty, having given the length of notice specified in their contract;
 - Employees are not charged any fees for recruitment;
 - The confiscation or withholding of any employee identity document is strictly prohibited;
 - Our workplace is free from any form of harsh or inhumane treatment, as outlined in our Anti-Harassment and Anti-Bullying Policy;
 - All employees are treated fairly and equally as underpinned by our Equality and Diversity Policy;



- All employees are paid at least the minimum wage required by law and wages paid are paid regularly directly to the employee (Labour Standards Policy);
- Employees are not required to work in excess of the legally mandated number of hours (Labour Standards Policy);
- Any and all overtime is voluntary and no employee will be required to work overtime under threat of penalty or dismissal.

Our due diligence process

As a supplier of managed software services, we consider the risk of modern slavery existing within our business to be low. However we have implemented our own due diligence programme with a risk based approach to assess the possibility of modern slavery within our supply chain. We retain a register of Modern Slavery Act statements in respect of our suppliers, and where those either are not in evidence, or are not required, we review the risk assessment of that supplier. Where we have identified a potential risk, it will be investigated and mitigated through activities such as enhanced due diligence.

We do not tolerate Modern Slavery within our supply chains. In the rare event that we become aware of a case of Modern Slavery, we will work with the supplier to implement remedial action. We expect our suppliers to engage with us constructively and responsibly, and to demonstrate their willingness to remedy issues in a timely manner. Should we find evidence that our supplier is not willing to address issues, we will seek to terminate our relationship with the relevant supplier.

Training

Annual training is provided to all employees as part of our company training programme.

Improvements over the last year

We have continued to assess the likelihood of exploitation in our supply chain through our risk-based approach to new suppliers. We have completed and continue to maintain the register in respect of our suppliers. We are pleased to report that there have been no occasions when we have had to terminate business nor to carry out further investigations with any suppliers on the grounds of contravention of the Modern Slavery Act.

We have continued to apply all relevant background checks and fulfil our legal obligations when recruiting new employees and are confident that there have been no discrepancies that would indicate any non-conformity with the Modern Slavery Act.

We have well established processes and procedures requiring all our suppliers either to produce a Modern Slavery Act statement or to sign a declaration of conformity with the Modern Slavery Act.



Our awareness training programme in relation to the Modern Slavery Act for all employees in Synectics was reviewed during the last year and will continue on an annual basis.

Improvements for the forthcoming year

We will continue to require our suppliers to confirm compliance with the provisions of the Modern Slavery Act and will continue to monitor and take action with our suppliers should we find any indication of modern slavery in our supply chain.

We will continue with the awareness training in relation to the Modern Slavery Act which requires all employees to complete training in this respect on an annual basis.

Board Approval

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Synectics' slavery and human trafficking statement for the financial year ending 31 August 2024.

Date approved by the Board: 15 August 2023

Signed: Richard Wood
Chief Executive Officer
Synectics Solutions Limited