

Sungard Availability Services (UK) Limited MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT

As a supplier of services in the UK, Sungard Availability Services (UK) Limited (the "Company") acknowledges its obligation under the Modern Slavery Act 2015 ("MSA") to publish an annual statement ("Statement") setting out the steps the Company has taken during the financial year to ensure that slavery or human trafficking are not taking place in any of its supply chains or in any part of its business. We are proud of the steps we have taken to combat slavery and human trafficking and we seek to ensure that products and services delivered to our customers or used in our business are sourced from suppliers, subcontractors and business partners that share our commitment to worker welfare and eradicating all forms of human trafficking in their operations and supply chains.

1. ORGANISATION'S STRUCTURE

Sungard Availability Services (UK) Limited, incorporated in the United Kingdom, is an indirect, wholly owned subsidiary of the ultimate parent company, Sungard AS New Holdings, LLC that is limited liability company, formed, qualified and operating under the law of the State of Delaware, USA. We are a part of the Sungard Availability Services Group ("Sungard AS Group") of companies that has operations in nine (9) countries with over 2000 employees globally. In 2018, the Sungard AS Group revenue was \$977 million USD.

2. OUR BUSINESS

As a leading provider of availability and recovery solutions for more than 35 years, we deliver cloud-based and managed IT services solutions, information availability consulting services and disaster recovery services. The Sungard AS Group operates data centres and recovery locations that encompass more than 5 million square feet in nearly 80 locations worldwide, 19+ of which are in the UK.

3. OUR SUPPLY CHAINS

The supply chain supporting our UK operations includes the following categories of suppliers:

- ▶ Commercial and business services;
- ▶ Construction and building materials;
- ▶ Consumer products for business offices;
- ▶ Facilities maintenance and critical infrastructure components;
- ▶ Software and services;
- ▶ Technology hardware and equipment suppliers and maintenance; and
- ▶ Telecommunications and network services.

4. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our [Supplier Policy \(Supplier Code of Conduct\)](#) and [Global Code of Business Conduct](#) reflect our commitment to acting ethically and with integrity in all our business relationships and our zero tolerance for human trafficking in our supply chains.

Our Global Code of Business Conduct is based on our Core Values of Accountability, Integrity, Respect, Initiative and Teamwork. We recognize that every decision we make and every action we take can affect the way our employees, customers, business partners and suppliers perceive our company. Maintaining our reputation as an ethical and responsible corporate citizen is predicated on acting with the highest values and principles. We expect our employees, partners and suppliers to share our commitment to ethical conduct.

Suppliers shall not engage in any form of human trafficking in their supply chains. Drawing on the works of the United Nations and the International Labour Organization, we expect all suppliers to respect the human rights of their employees and provide them equal opportunity. This entails fostering an inclusive environment that condemns any type of discrimination, child and forced labour.

5. DUE DILIGENCE PROCESS

We implemented procedures to identify and assess potential risk areas in our supply chains supporting our UK operations by conducting a high-level assessment of the potential risk for Human Trafficking presented by a supplier based on the type of goods or services provided, country of operation, and industry sector. After our initial review in 2017, no existing suppliers presented high risk for human trafficking based on this assessment. Subsequent reviews focus on new suppliers as well as those suppliers with new spend. Per our procedures, if the Supplier presents a risk based on these factors, Procurement will review the Supplier with Compliance prior to awarding a contract. Suppliers that present some risk but are not high risk are required to execute Supplier Code of Conduct Agreements and Human Trafficking – Supplier Certifications documenting their commitment and efforts to ensure that slavery and human trafficking are not taking place in any of their supply chains or in any part of their business. If there is evidence of non-compliance, Sungard AS will insist supplier remediate the situation or risk termination of the supplier agreement. Since our initial review, our supply chain assurance process, described below, has not revealed evidence of non-compliance.

6. SUPPLIER ADHERENCE TO OUR VALUES

To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain assurance programme. This consists of establishing a consistent process for engaging with our suppliers and subcontractors to ensure that they meet or exceed minimum Supplier Policy (Supplier Code of Conduct) requirements and legal standards. Suppliers that present some risk for Human Trafficking must certify to their efforts to eradicate all forms of human trafficking in their operations and supply chains by signing the Supplier Code of Conduct and Human Trafficking Supplier Certification.

We have a dedicated compliance team, which consists of representatives from Procurement and Legal. Supplier compliance with the requirements of Supply Chain Code of Conduct and this Assurance Procedure will be reported to the Chief Compliance Officer and executive management on a regular basis through the quarterly Risk and Compliance Committee meetings; which strive to ensure the overall understanding, management and mitigation of operational and strategic risk and compliance through regular communication between risk management functions.

7. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we developed training for those employees in areas that may be exposed to slavery and human trafficking practices.



8. Protect Whistle Blowers

Individuals may submit a report of suspected violations of this policy by phone or web by accessing the AlertLine home page at <http://www.sungardasalertline.ethicspoint.com> or by sending an email to AskASCompliance@sungardas.com. Our Code of Conduct includes a non-retaliation policy that protects individuals who report concerns in good faith from retaliation.

9. FURTHER STEPS

We will periodically review the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains and intend on taking corrective action, if needed, to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31, December 2018.

SIGNATURE OF DIRECTOR



Mike Threlfall
SUNGARD AVAILABILITY SERVICES (UK) LIMITED

Date:

About Sungard Availability Services
Sungard Availability Services provides managed IT services, information availability consulting services and disaster recovery services.

To learn more, visit www.sungardas.com or call 1-888-270-3657

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