



TRANSPARENCY IN SUPPLY CHAIN STATEMENT FOR THE FINANCIAL YEAR ENDING DECEMBER 31, 2023

1. Introduction

- 1.1. Abacus Information Technology, LLC is committed to preventing modern slavery and human trafficking in its business and supply chains, and those of its subsidiaries (together "Abacus").
- 1.2. In accordance with its obligation under the Modern Slavery Act 2015 (the "2015 Act"), Abacus Information Technology, LLC sets out below a statement of the steps taken in the last financial year to ensure slavery and human trafficking is not taking place in any part of Abacus' business or in any of its supply chains.
- 1.3. Although the Abacus subsidiary in the UK, Abacus Information Technology UK Ltd, does not itself meet the criteria to make an annual modern slavery statement pursuant to s.54 of the 2015 Act, this statement includes actions taken in respect of Abacus Information Technology UK Ltd as part of Abacus.

2. Our business

- 2.1. Founded in 2008, Abacus is a global IT services business for alternative investment firms, providing an enterprise technology platform specifically designed to meet the unique needs of the financial services industry. Abacus provides outsourced IT services to over 600 investment management firms across the globe.
- 2.2. Abacus is headquartered in New York with offices in multiple locations across the US and has a subsidiary, Abacus Information Technology UK Ltd, in London, England.

3. Our supply chains

- 3.1. As an IT services company, Abacus' direct supply chains are relatively limited. However, we do engage with certain suppliers (for example to purchase IT hardware) as part of our business. We complete legal and compliance due diligence where appropriate before committing to engage with a supplier. We also include a requirement to comply with applicable law (which would include applicable anti-slavery and human trafficking law) in our Master Professional Services Agreements with our clients both in the US and UK, as well as have similar clauses in our contracts with a number of large suppliers to Abacus. To date, we have not identified any modern slavery issues with our clients, the suppliers we have engaged or their supply chains.

4. Our policies and contractual controls

- 4.1. Abacus has, throughout 2021, had in place an Employee Handbook. This includes a requirement on employees to behave ethically at all times and in all business transactions. The Employee Handbook sets out Abacus' expectation of employee behavior, and specifically refers to the following types of behavior being treated as Misconduct or Gross Misconduct:
 - Unfitting behavior
 - Failure to carry out lawful instructions
 - Falsification of reports, accounts, expense claims or self-certification forms
 - Bullying, sexual, racial, or other harassment of a fellow employee
 - Conviction on a criminal charge
 - Bringing the Company or its employees into disrepute
- 4.2. Ethical behavior is the foundation to our success in achieving our business objectives and we recognize it is in our best interest to set high standards for ourselves at all times, including not engaging in modern slavery or human trafficking, and to align ourselves with agents, representatives, suppliers, and partners who have similar high standards of business conduct.
- 4.3. Our Employee Handbook also requires that we comply with all applicable laws, rules, and regulations in the jurisdictions in which Abacus operates. This includes complying with applicable anti-slavery and human trafficking laws.
- 4.4. All Abacus staff, and any person that carries out work for Abacus, is expected to act in accordance with our policies and procedures, including the Employee Handbook. Abacus has a disciplinary procedure in should potential breaches of policies or procedures be identified.
- 4.5. Abacus also has a whistleblowing policy through which concerns, including relating to modern slavery, can be raised. The whistleblowing policy is set out in the Employee Handbook.
- 4.6. We consider that adherence to and compliance with our policies and procedures, including the Employee Handbook, should reduce the risks of modern slavery occurring in our business or supply chains.

5. Risk assessment and due diligence

- 5.1. Abacus is not aware of any slavery or human trafficking issues within its business or supply chains. In the last financial year, no potential issues of this type have been identified or reported through internal reporting channels, audit processes, whistleblowing or otherwise.
- 5.2. On this basis, and given our main activities are the development of software services and that our workforce is predominantly high skilled, we consider the risk of slavery or human trafficking for Abacus in its business and its supply chain continues to be low. However, we recognize that business operations such as

sourcing of electrical equipment and cleaners for our offices are types of activity that can give rise to modern slavery risks.

- 5.3. Abacus is committed to preventing slavery or human trafficking in its business or supply chains. As such, should any potential issue be identified, Abacus will act swiftly to investigate and, where appropriate, take responsive actions.
- 5.4. In the coming year, Abacus will also proactively consider what further steps could be taken to ensure modern slavery and human trafficking is not occurring in its business and supply chains, including appropriate staff training, and the wider use of relevant contract clauses.

6. Approval of this statement

- 6.1. This statement was approved by the Board of Abacus Information Technology, LLC on January 1, 2024.
- 6.2. This statement was signed by Jonathan Bohrer (President of Abacus Information Technology, LLC) on January 1, 2024.