

Modern Slavery Statement

2022-2023



The world is how we shape it

sopra  steria

INTRODUCTION

Modern slavery is prevalent across the world and given the hidden nature of the crime it is almost impossible to understand the full scope and scale of the issue.

At Sopra Steria we have a responsibility to ensure that there is no slavery or human trafficking in our own business and our supply chains. This statement outlines the policies, processes, and sets out the actions that we have taken to understand the potential risks to our business from modern slavery. This statement relates to the financial year ending 31st December 2022 and is in accordance with national laws.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and also in our supply chain.

A photograph of the International Space Station (ISS) in orbit above Earth. The station's complex structure, including multiple modules and large solar panel arrays, is clearly visible against the bright blue and white horizon of the planet. The background shows a vast expanse of the Earth's surface, with a mix of blue oceans and brownish landmasses under a clear sky.

With over 50,000 employees in nearly 30 countries, we deliver services that make a difference, for our clients, their customers, and our communities.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

The world is how we shape it and we're harnessing the power of innovation to drive positive change in business and society. Known for our collaborative approach, we provide consulting and digital services, creating innovative solutions, at scale, to deliver sustainable growth and services that make life better. Our work touches many lives in the UK. From helping the Government provide essential public and health services that offer more convenience and choice, to improving financial services to deliver fairer, customer-centric solutions.

We are proud to be a signatory to the United Nations Global Compact, including Principle Four: Labour, and we align our company to the UN Sustainable Development Goals,

including Goal 8- Decent work and economic growth. To ensure that we are aligned with the company's values for an ethical business, we annually assess ourselves using the EcoVadis Corporate Social Responsibility (CSR) assessment. This allows us to benchmark ourselves against our competitors. We have received a Platinum award, for the third year in a row, progressing from an "Advanced" score to "Outstanding", ranking us in the top 1% of companies assessed against the 21 different sustainability criteria, including our response to modern slavery.

This statement covers the activities of Sopra Steria Limited, whose headquarters are in Hemel Hempstead in the United Kingdom. Sopra Steria Limited is part of Sopra Steria

Holdings, which also comprises of NHS Shared Business Services and Shared Services Connected Limited. Sopra Steria Holdings is part of the Sopra Steria Group, based in Paris, France.

Our supply chain primarily comprises of organisations within the UK and Europe. We recognise that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking, and we mandate our suppliers to prevent and avoid slavery and human trafficking in their supply chains, including in these higher risk countries.



As an organisation we are ranked
“Outstanding” by EcoVadis having
received a platinum award for the
third year in a row ranking us in
the top 1% of companies assessed

SOPRA STERIA LIMITED’S APPROACH TO PREVENTING SLAVERY AND HUMAN TRAFFICKING

RELEVANT POLICIES

The following policies define the steps we have taken to prevent slavery and human trafficking in our operations and supply chain. In the last financial year, we have updated our Sustainable Procurement Policy, and our Recruitment and Selection Policy.

- **Code of Ethics** – underpins our approach to transparency fairness and loyalty towards our customers, employees, suppliers, and others in wider society. The Code of Ethics is aligned to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour. Sopra Steria provides all employees with access to a whistleblowing process enabling them to report concerns that are contrary to this code including breaches of human rights and human trafficking.
- **Sustainable Procurement Policy** – This policy applies to all procurement activities in the UK and requires we adhere to social and ethical standards, and human and labour standards in the procurement of goods and services. Our standard terms and conditions for our suppliers also requires them to uphold human and labour rights and (in the UK) to prevent slavery and human trafficking in their own operations and their supply chains.
- **Sustainability Policy** – applicable to all employees, this policy explicitly commits us to preventing slavery. It also requires us to uphold human and labour rights.
- **Policy for Recruitment and Selection** – We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency and all candidates must go through a verified right to work check. In the UK, a requirement to comply with the Modern Slavery Act 2015 is contained in our supplier contracts.
- **Equal Opportunities and Diversity Policy** – our commitment to establishing and maintaining a working environment which is free from discrimination, and which values all employees as individuals.

DUE DILIGENCE: PROCESSES AND PRACTICES

Within our own operations

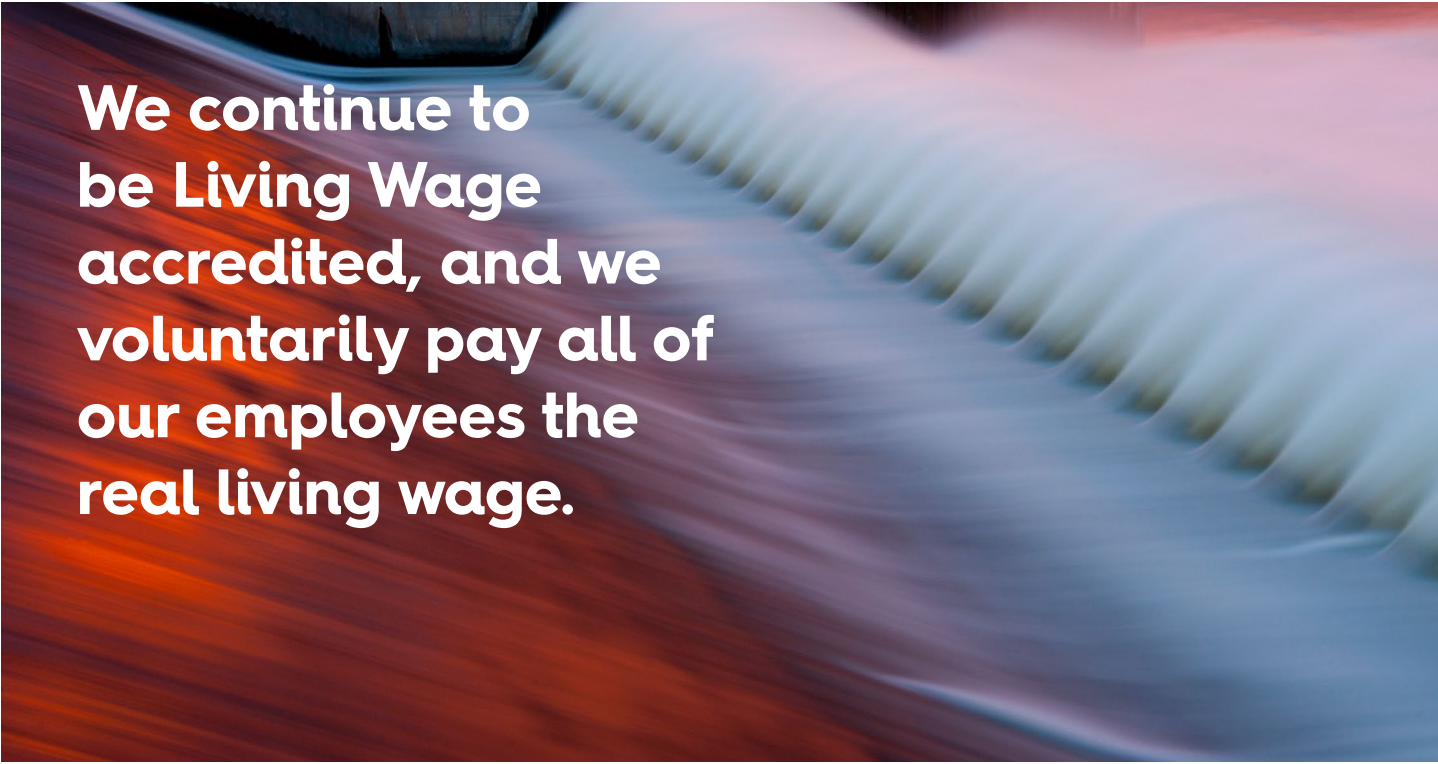
We are committed to preventing slavery and human trafficking and have several policies and processes in place to ensure that our employees are not being exploited and that they have a safe and supportive working environment. To support this, we have taken the following steps:

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave our employment. Employees are free to serve notice at any time.
- We carry out verification of an employee's identity and ongoing right to work in the UK.
- We do not withhold any employee's identity documents or passport during their employment.
- We comply with or provide enhanced versions of all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.
- We respect the right of individual employees to join a trade union and, where groups of employees elect to be represented by a trade union, we are committed to engaging with trade unions in pursuit of harmonious industrial relations.
- We have introduced a communication and training campaign around modern slavery, to make employees aware of their rights and how to spot and report signs of modern slavery.

Furthermore, in this financial year we have also taken the following steps:

- We have worked with industry bodies to work on best practices on modern slavery, and then we have embedded that into our own policies and working practices.
- We continue to be Living Wage accredited, and we voluntarily pay all of our employees the real living wage, including those employed by our property and facilities providers. We have also set an expectation in our Supplier Code of Conduct that our suppliers pay the Living Wage and work towards Living Wage accreditation.

Any suspected cases of slavery or human trafficking can be raised by an employee, using the procedures outlined in the Code of Ethics. To date we have not had any instances of an employee reporting a suspected case of within our company.



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We annually procure in excess of £200m of goods and services through our supply chain, of which 94% is with organisations in the UK.

Within our supply chain

We recognise that our supply chain contributes the greatest risks for slavery and human trafficking and as such, our relationship with the supply base is a critical part of our commitment to eliminating modern slavery and creating a healthy and diverse supply chain. Annually we procure in excess of £200m of goods and services, of which 94% is with organisations in the UK, 5% with companies within the European Union and North America and less than 1% from the rest of the world.

We ensure that during all stages of the procurement life cycle, we consider modern slavery risks. If there is a suspected case of modern slavery, we will ensure that the correct procedures are followed, and the victims are supported. We will work with suppliers through our policies and contracts, and deal with any issues on a case-by-case basis.

Key categories of spend comprise:

- IT Services
- Consultancy and Contractors.

We undertake robust due diligence when taking on all new suppliers, and regularly review our existing supply chain.

Our supply chain engagement programme for all suppliers on modern slavery includes:

- An assessment for every new supplier during the on-boarding process, which includes acceptance of our Supplier Code of Conduct and our standard Terms and Conditions. These prohibit slavery and human trafficking and requires suppliers to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains.
- We continue to work with specialist organisation, EcoVadis, to assess and monitor our key suppliers against 21 different areas related to social, environmental, and ethical responsibility in the supply chain. We gather data on our suppliers' labour standards, fair business practices in their own organisations and also their supply chain. This assessment allows us to identify areas of concern and provides suppliers with action plans for improvements.



- Invoking sanctions. No standard process is followed if there is a suspected case of modern slavery in our supply chain. We will work with our suppliers to investigate and ensure the correct procedures are followed within a given time. If these standards are not met, we will then investigate the termination of business relationships or contracts with suppliers that fail to improve their performance in line with an action plan or where our agreed terms of trading have been breached.
- Reviewing the risks of modern slavery during all stages of the procurement process including tender evaluation, contract award and in-life contract management.
- We continue to be a signatory of the Prompt Payment Code, which sets standards for payment best practice, and reduces the risk of late and extended payments, in turn reducing the pressures on suppliers that could lead to modern slavery. Our standard payment terms are net 30 and we currently pay 97% suppliers in accordance with its principles.
- Continually monitoring our Supplier Code of Conduct to ensure that it is relevant and contains clear obligations for our suppliers concerning prevention of modern slavery and reporting compliance to the code back to our parent Group on a monthly basis.

In the Financial year we have:

- Implemented electronic invoicing to all suppliers. This will help to improve the payment process and help us achieve our goal to pay all suppliers to terms.
- Added our Statement to the Government Modern Slavery Statement Registry to ensure complete transparency of our operations.
- Created the Social Value Steering Board which has executive management sponsorship and comprises senior representatives from across the business focusing on creating a lasting benefit to for our colleagues, clients, our supply chain, and communities in which we operate.
- Engaged with STOP THE TRAFFIK participating in events to raise awareness of human trafficking and to provide training. They have carried out an assessment of the inherent modern slavery risk of a targeted list of our suppliers to help us to identify increased risk of slavery and human trafficking. A number of recommendations have come out of this assessment which will be addressed during the next financial year.



TRAINING AND AWARENESS-BUILDING

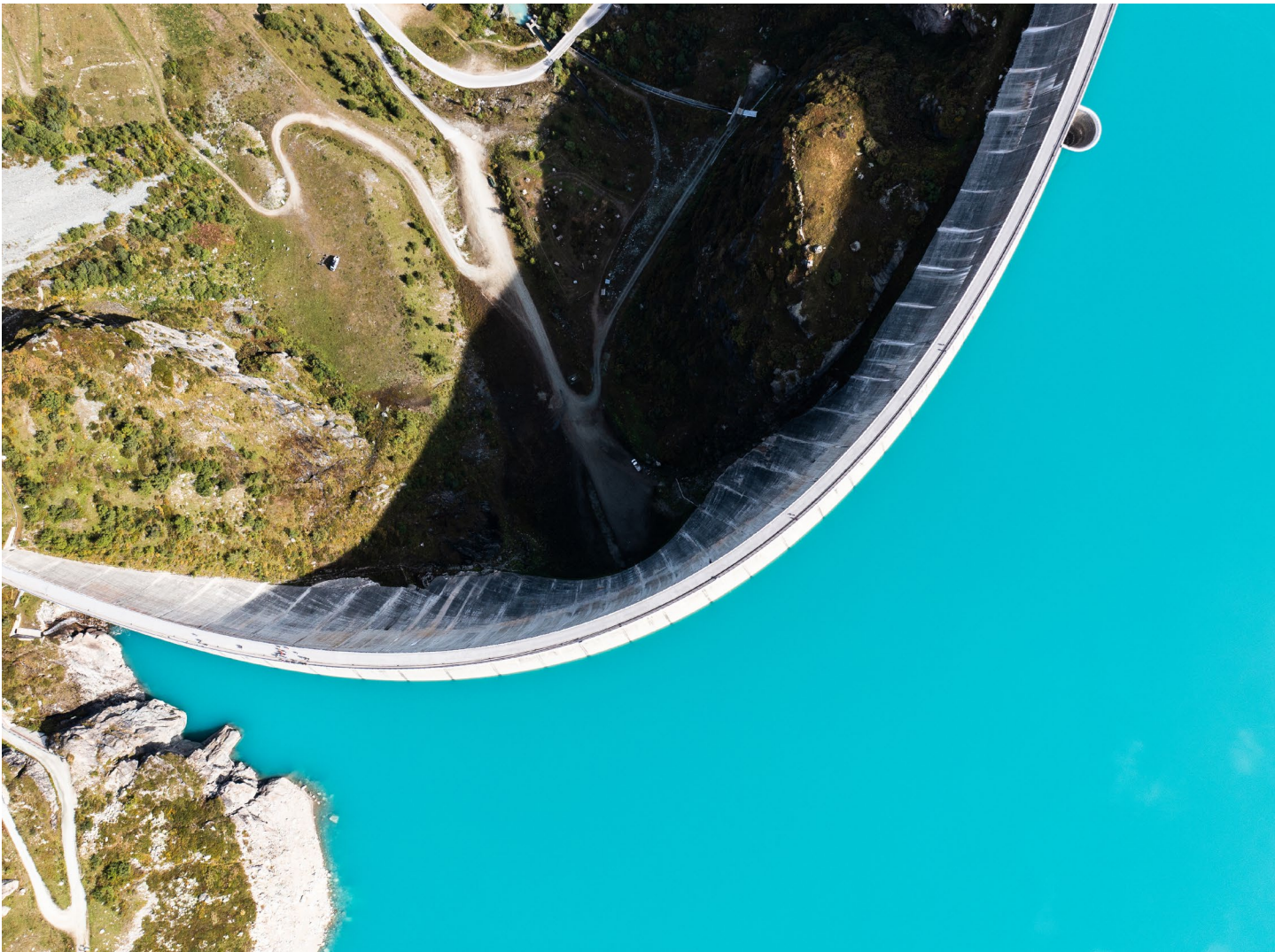
We know how vital it is that our employees understand the issue of modern slavery and can recognise the signs and report potential instances in our supply chain.

- We provide role specific training sessions for employees who have engagement with suppliers, such as the Procurement and Facilities Teams, to help them understand the risks of human trafficking and how to spot potential dangers through both the initial supplier on boarding process and subsequent supplier reviews and assessments.
- We continue to provide mandatory modern slavery training which is compulsory for all employees, including contractors, and all new starters to the company will be asked to complete this as part of their induction process. This training includes ILO's Forced Labour Indicators.

PERFORMANCE INDICATORS

We have in place the following key performance indicators (KPIs) and these indicators and activities are reviewed at least annually.

- Supplier engagement:
 - 100% of our suppliers to have agreed to the Supplier Code of Conduct.
 - 100% of annually targeted suppliers have completed the EcoVadis sustainability assessment.
- Modern Slavery Training:
 - Ensure that 100% of all existing and new employees, and contractors complete the compulsory modern slavery training.
 - Ensure that 100% of employees who have roles dealing with suppliers, such as the Procurement Team receive ongoing updates and notifications regarding business & human rights, and specifically modern slavery.





RESPONSIBILITY

Responsibility for our initiatives addressing slavery and human trafficking are as follows.

POLICIES

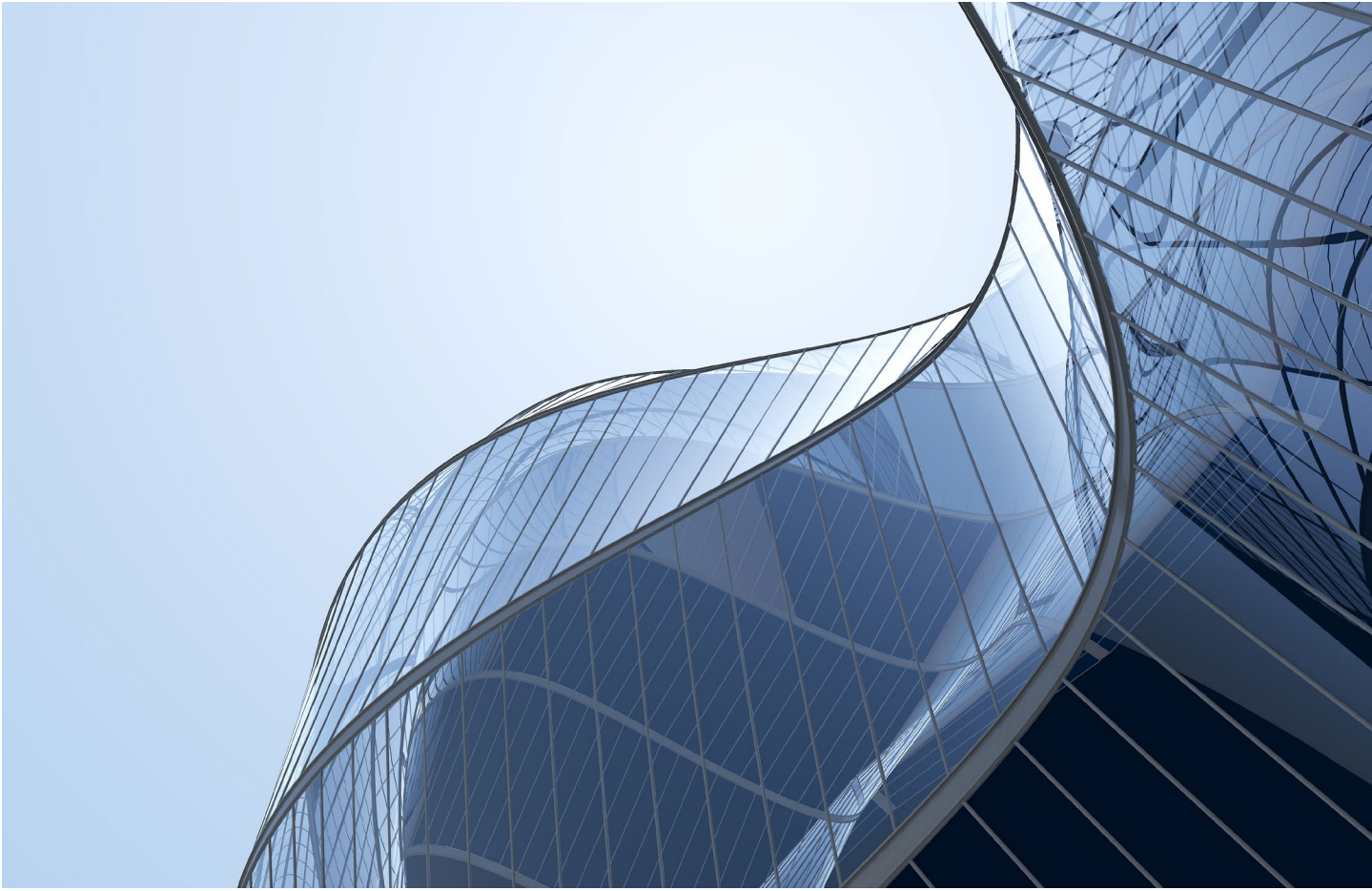
Responsibility for policies are:

- Human Resources – Director of Human Resources, Sopra Steria Limited, for policies related to the prevention of slavery and human trafficking in our own operations
- Chairman Sopra Steria Group SA (France), for the Sopra Steria Group Code of Ethics
- Procurement – Procurement Director, Sopra Steria Limited, for policies related to the prevention of slavery and human trafficking in our supply chain.

DUE DILIGENCE

In our own operations, the Human Resources Team are responsible for ensuring that all due diligence checks are undertaken during all the stages of employment, from initial recruitment onward.

In our procurement and supply chain management activities, our procurement team are responsible for undertaking due diligence activities, and for such activities related to slavery and human trafficking, they take input from other parts of the business, including Legal, HR and Sustainability.



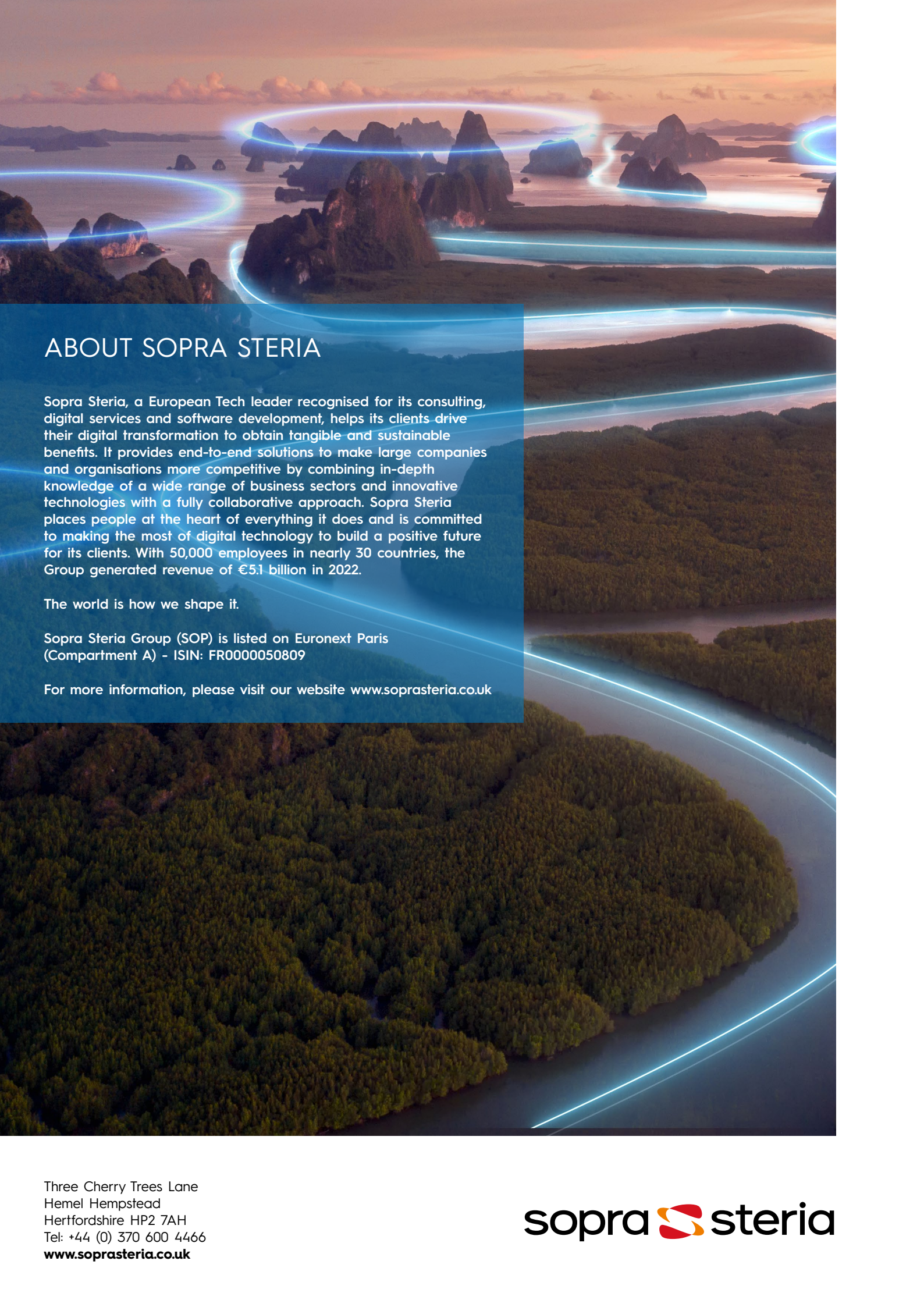
BOARD APPROVAL

Sopra Steria Limited's Board of Directors has approved this statement for the Financial Year ending on 31st December 2022

Director's signature: 

Director's name: John Neilson

Date: 20 June 2023



ABOUT SOPRA STERIA

Sopra Steria, a European Tech leader recognised for its consulting, digital services and software development, helps its clients drive their digital transformation to obtain tangible and sustainable benefits. It provides end-to-end solutions to make large companies and organisations more competitive by combining in-depth knowledge of a wide range of business sectors and innovative technologies with a fully collaborative approach. Sopra Steria places people at the heart of everything it does and is committed to making the most of digital technology to build a positive future for its clients. With 50,000 employees in nearly 30 countries, the Group generated revenue of €5.1 billion in 2022.

The world is how we shape it.

Sopra Steria Group (SOP) is listed on Euronext Paris (Compartment A) - ISIN: FR0000050809

For more information, please visit our website www.soprasteria.co.uk

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