Modern Slavery Statement

2023-2024



The world is how we shape it

sopra steria

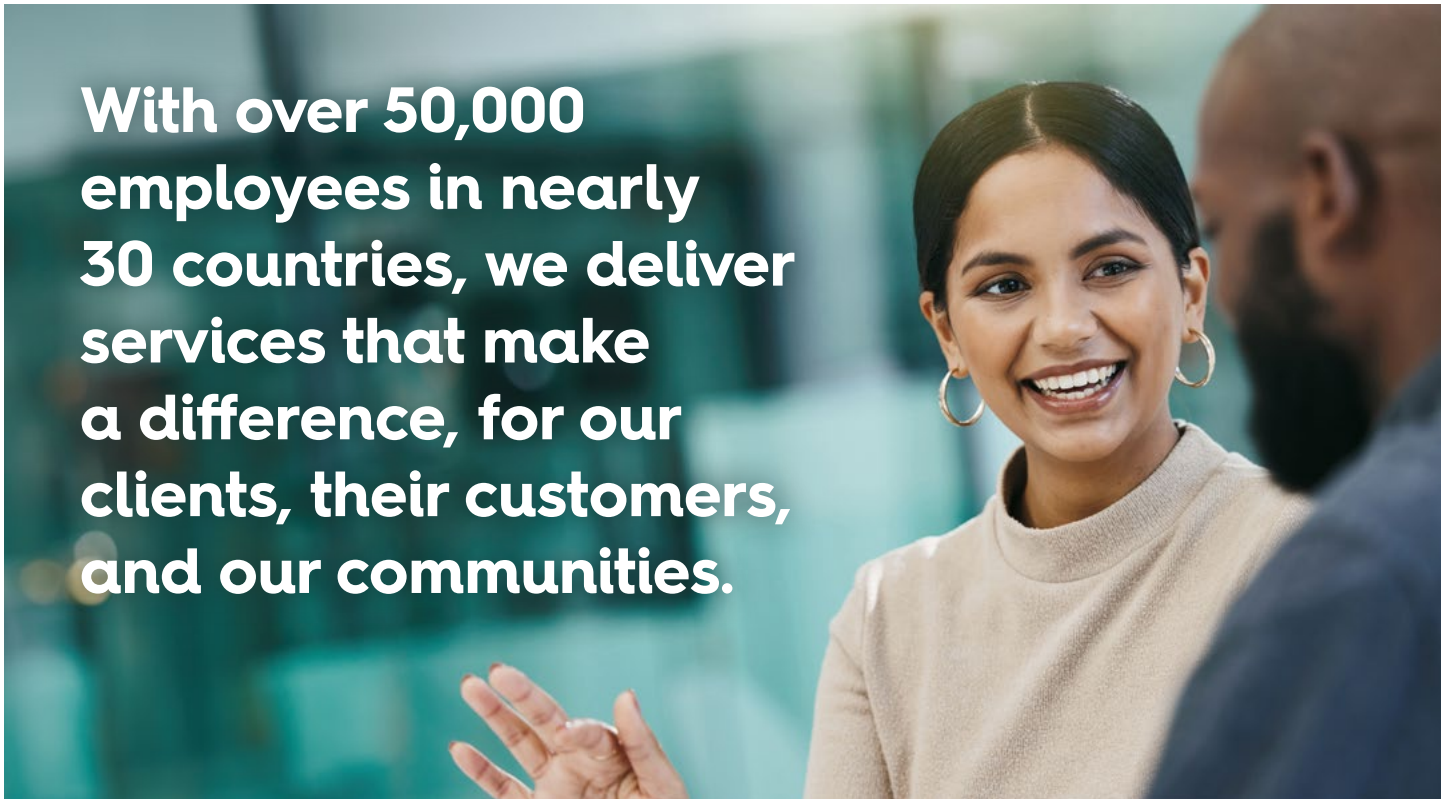
Introduction

Modern slavery is prevalent across the world. 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 make sure there is no modern slavery or human trafficking in our own business and in our supply chains. This statement outlines the polices, processes and actions we have taken to understand the potential risks to our business from modern slavery. This statement relates to financial year ending 31st December 2023 and is in accordance with national laws.

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





Organisational Structure and Supply Chains

The world is how we shape it. We are 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 which offer more convenience and choice, to improving financial services to deliver fairer, customer-centric solutions. With over 50,000 employees in 30 countries, we deliver services which make a difference for our clients, their customers and our communities.

We are proud to be a signatory to United Nations Global Compact including Principle Four: Labour. We also align our company to United Nations Sustainable Development Goals including Goal 8 - Decent work and economic growth. To make sure 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 fifth year in a row. This ranks us in the top 1% of companies assessed globally against 21 different sustainability criteria including our response to modern slavery.

This statement covers the activities of Sopra Steria Limited headquartered 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 UK and Europe. However we recognise our upstream supply chain does include countries with a higher risk of modern slavery and/or human trafficking. We mandate our suppliers to prevent and avoid modern 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 globally.

Sopra Steria's Approach to Preventing Modern Slavery and Human Trafficking

Relevant Policies

The following policies define the steps we have taken to prevent modern slavery and human trafficking in our own operations and supply chain.

- **Code of Ethics** – This 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 10 principles of United Nations Global Compact including fighting against child labour and exploitation, forced labour or any other form of compulsory labour. Sopra Steria provides all employees with access to a whistleblowing process allowing them to report concerns which are contrary to this code including breaches of human rights and human trafficking.
- **Responsible Procurement Policy** – This policy applies to all procurement activities in the UK and requires we adhere to social, ethical, human and labour standards in the procurement of goods and services. Our standard supplier terms & conditions as well as our Supplier Code of Conduct, also require them to uphold human & labour rights and legislation (in the UK) to prevent modern slavery & human trafficking in their own operations and supply chains.
- **Sustainability Policy** – Sopra Steria's Sustainability Policy in conjunction with its Sustainability Framework allows us to be part of a more sustainable economy & community, have more engaged employees and forge better relationships with our stakeholders. This is achieved by aligning our strategy, objectives, policies and practices with the highest standards of sustainability. This includes championing the human and labour rights of our employees and fighting modern slavery.
- **Policy for Recruitment and Selection** - We only use specified, reputable employment agencies to source labour. We always verify the practices of any new agency before accepting workers from them. All candidates must go through a verified right to work check. In the UK, a requirement to comply with Modern Slavery Act 2015 is contained in our supplier contracts.
- **Equal Opportunities and Diversity Policy** - Defines 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

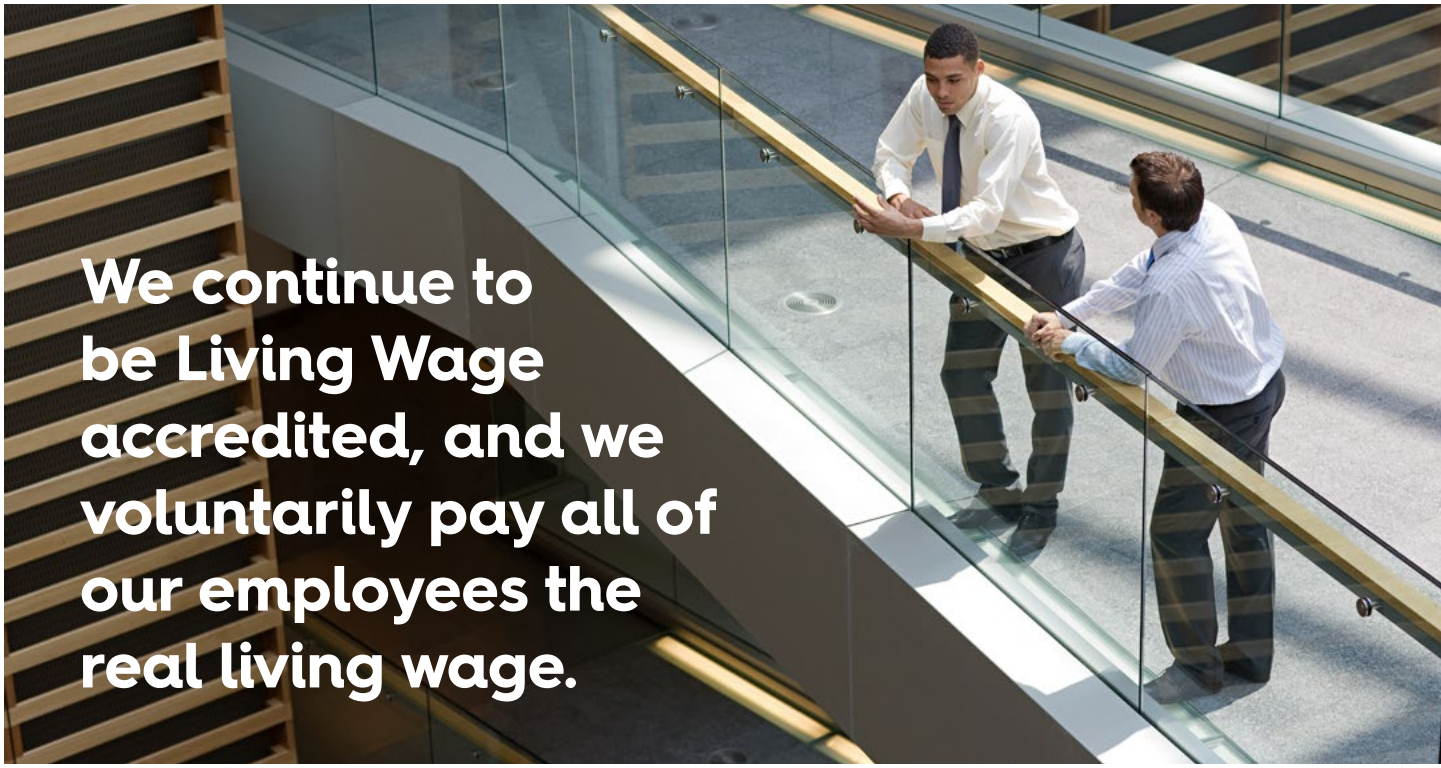
Within our own operations

We have several policies and processes in place to make sure 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. It sets out 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 conduct 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 & statutory time off, holiday entitlement, time off for personal emergencies, sickness, maternity/ paternity leave, minimum rest breaks and periods.
- We respect the right of individual employees to join a trade union. 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 continue to engage with and train all employees, including Contractors, on modern slavery and human trafficking. Raising awareness of their rights as well as how to spot and report signs of modern slavery.

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

- We have worked with industry bodies such as Business Services Association (BSA) and tech:UK to work on modern slavery best practice. We use the results of these engagements to inform our own policies and working practices.
- We have been Living Wage accredited for the past four years. We voluntarily pay all 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 for our suppliers to pay the Living Wage and to work towards Living Wage accreditation.
- Any suspected cases of modern 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 within our company.





Our recent Total Facilities Management Tender is a good example of where we have worked closely with prospective bidders to understand their approach to Social Value and to the prevention of modern slavery, making sure the successful bidder was fully committed to working with us on this important topic.

Within our supply chain

We recognise our supply chain contributes the greatest risks for modern slavery and human trafficking. As a result of this, 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 96% is with organisations based in the UK and EU, 3% with companies based within North America and less than 1% from the rest of the world.

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

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Key categories of spend comprise:

- IT Services
- Consultancy and Contractors.

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

- An assessment of every new supplier during the onboarding process which includes acceptance of our Supplier Code of Conduct and our standard Terms and Conditions. Our Supplier Code of Conduct mandates our Suppliers comply with a set of obligations which include,
  - Prevention of modern slavery and human trafficking in their own operations and supply chains.
  - Making sure neither they nor their suppliers use child labour and that their employment of young workers adheres to International Labour Organisation's standards and local regulations.
  - Confirming neither they nor their suppliers use debt bonded labour in their operations.
- Using 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 and fair business practices within their own organisations and supply chain. This assessment allows us to identify areas of concern and provides suppliers with action plans for improvements.



- Invoking sanctions about a suspected case of modern slavery in our supply chain - We will collaborate with our suppliers to investigate and make sure appropriate procedures are followed within a given timeframe. If we are not satisfied with the result, we will investigate the termination of business relationships or contracts with suppliers who 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. This sets standards for payment best practice and reduces the risk of late and extended payments. This in turn reduces pressures on suppliers that could lead to modern slavery. Our standard payment terms are net 30 days. We currently pay 98% suppliers in accordance with its principles.
- Continually monitoring our Supplier Code of Conduct to make sure it is relevant and contains clear obligations for our suppliers concerning prevention of modern slavery and reporting compliance with the code back to our parent company, Sopra Steria Group, monthly.

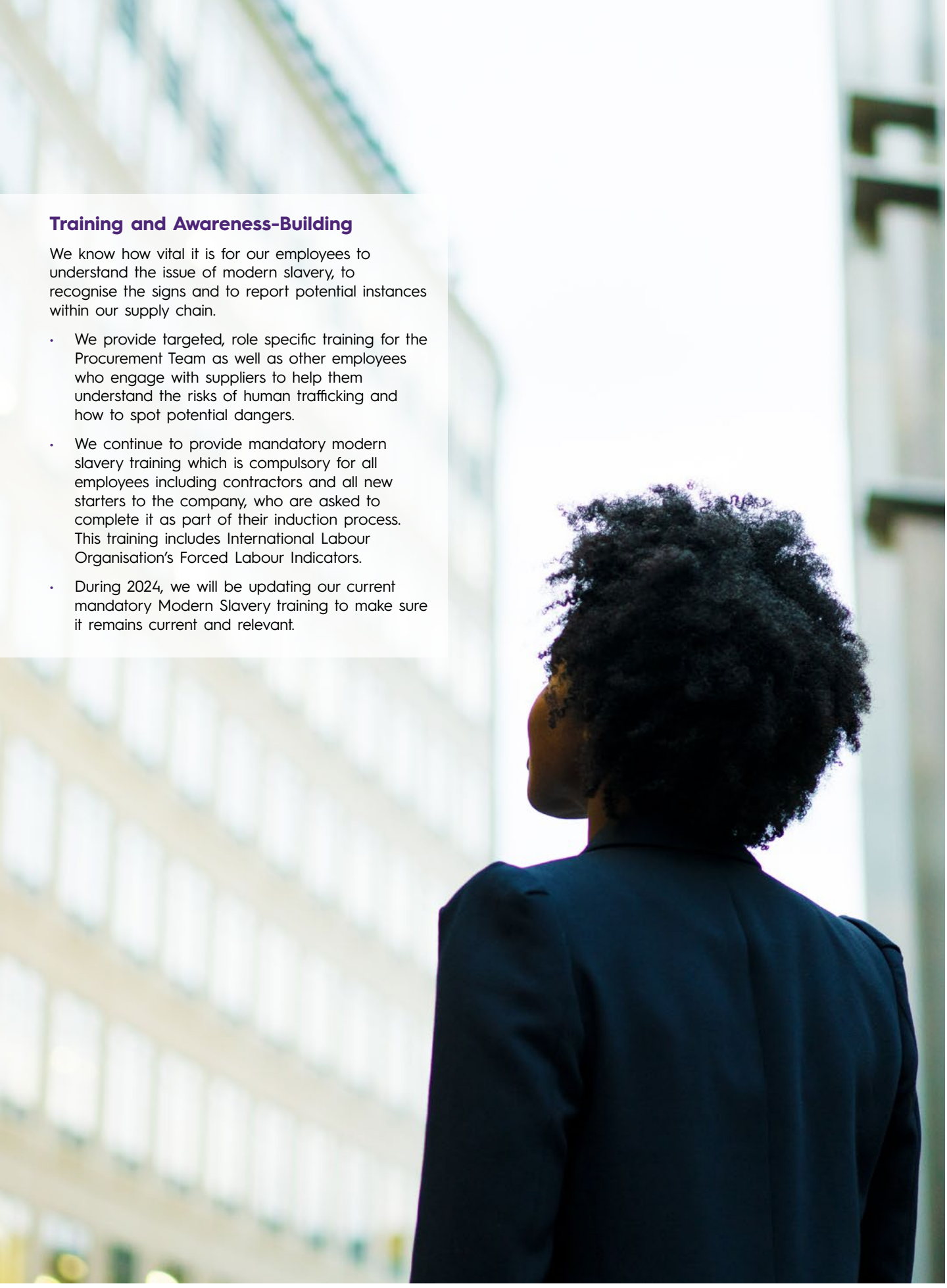
In the Financial year:

- We have continued to add our Modern Slavery Statement to the Government Modern Slavery Statement Registry to insure complete transparency of our operations.
- As a result of establishing the Social Value Steering Board in late 2022, we have now employed a dedicated Responsible Supply Chain resource to focus on all aspects of Responsible Procurement including modern slavery.
- Based on recommendations received from STOP THE TRAFFIK, a specialist modern Slavery charity, we have conducted an inherent risk analysis of our supply chain which identified a potential high risk set of Suppliers for further analysis.
- ·We have created a new set of Standard Contract templates which reinforce a Supplier's commitment to prevention of modern slavery and human trafficking. We have created a dedicated mailbox for Suppliers to report any suspicions of modern slavery or human trafficking.
- During 2024, we will undertake the Modern Slavery Assessment Tool (MSAT) Survey for 2023 to identify any areas of improvement in our current modern slavery governance. We will also build on the recommendations we have received from STOP THE TRAFFIK to assess any potential risks identified.

Training and Awareness-Building

We know how vital it is for our employees to understand the issue of modern slavery, to recognise the signs and to report potential instances within our supply chain.

- We provide targeted, role specific training for the Procurement Team as well as other employees who engage with suppliers to help them understand the risks of human trafficking and how to spot potential dangers.
- We continue to provide mandatory modern slavery training which is compulsory for all employees including contractors and all new starters to the company, who are asked to complete it as part of their induction process. This training includes International Labour Organisation's Forced Labour Indicators.
- During 2024, we will be updating our current mandatory Modern Slavery training to make sure it remains current and relevant.



Performance Indicators

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

- Supplier engagement:
  - 100% of our suppliers to agree with the Supplier Code of Conduct.
  - 100% of annually targeted suppliers to complete EcoVadis sustainability assessment.
- Modern slavery training:
  - 100% of all existing employees, new employees and contractors complete the compulsory modern slavery training.
  - 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 on modern slavery.





Responsibility

Responsibility for policies is:

Individual / Department	Title	Responsible for:
Human Resources	Director of Human Resources, Sopra Steria Limited	Policies related to the prevention of modern slavery and human trafficking in our own operations.
Chairman	Sopra Steria Group SA (France).	Sopra Steria Group Code of Ethics.
Procurement	Procurement Director, Sopra Steria Limited	Policies related to the prevention of modern slavery and human trafficking in our supply chain.

Due Diligence

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

In our procurement and supply chain management activities, our procurement team are responsible for undertaking due diligence and activities related to modern slavery and human trafficking. In these processes, they incorporate 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 2023

Director's signature: DocuSigned by: John Neilson A81705C200D84E2...

Director's name: John Neilson

Date 07-May-24



About Sopra Steria

Sopra Steria, a major Tech player in Europe with 56,000 employees in nearly 30 countries, is recognised for its consulting, digital services and software development. It helps its clients drive their digital transformation and obtain tangible and sustainable benefits. The Group 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 putting digital to work for its clients in order to build a positive future for all. In 2023, the Group generated revenues of €5.8 billion.

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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