

softserve

MODERN SLAVERY STATEMENT

This statement is made on behalf of SoftServe Systems Limited ("SoftServe") pursuant to section 54(1) of the Modern Slavery Act 2015.

SoftServe recognises that modern slavery and human trafficking are significant issues presenting a challenge for businesses. We are committed to improving our practices to combat slavery and human trafficking.

We take a **zero-tolerance approach** to modern slavery, being committed to acting ethically and with integrity in our business dealings.



WHAT WE DO

SoftServe has over three decades of experience providing a range of advanced engineering services, spanning various technology domains and industry verticals. We help businesses leverage technology to drive innovation and transformation, improve operational efficiency, and enhance customer experiences by partnering as digital consultants and an implementation partner.

Our offices are located in the U.K., Poland, Bulgaria, Romania, Ukraine, USA, Mexico, Colombia, Chile, UAE, Germany, Spain, Norway, and Singapore.

SoftServe empowers talented people to change the world.

OUR VALUES

TRUST

We cultivate an environment where trust thrives because of honesty, transparency, and mutual respect.

TEAMWORK

We value collaborative teamwork because it advances the success achieved by strong relationships and a sense of belonging.

GROWTH

We nurture growth, learning, and curiosity within our teams.

INNOVATION

We achieve technical excellence by fearlessly embracing the challenge to experiment and innovate.

WILLINGNESS TO HELP

We are community builders. Our willingness to help is at the heart of what we do.

EXCEED EXPECTATIONS

We go the extra mile, measuring our success by exceeding expectations.

As a member of the **UN Global Compact**, SoftServe is committed to contributing to all sustainable development goals set by the United Nations with the focus on:





SoftServe has a **zero-tolerance approach** to modern slavery, which is a crime and a violation of fundamental human rights. Modern slavery can take various forms, such as slavery, servitude, forced labor, and human trafficking, all of which exploit individuals for personal or commercial gain. These practices involve recruiting, harboring, transporting, or obtaining a person for labor or services through force, coercion, fraud, or other manipulative means, depriving them of their liberty.

SoftServe strictly prohibits all forms of human trafficking, including but not limited to:

- Using forced labor of any kind
- Procuring commercial sex acts while representing SoftServe
- Destroying or concealing an associate's identity or immigration documents, such as passports or driver's licenses
- Employing misleading or fraudulent recruitment practices, including failing to disclose important employment terms such as wages, benefits, location of work, and housing conditions
- Using recruiters who fail to comply with local laws
- Charging recruitment fees to candidates
- Failing to pay return transportation costs when required by law
- Providing or arranging housing that does not meet local safety standards
- Failing to provide proof of employment before the associate leaves their country of origin
- Failing to issue legally required employment contracts in a language the associate understands, where applicable

Corporate, legal, and SoftServe's global HR team are responsible for ensuring compliance with legal and ethical obligations, as well as ensuring all employees and associates adhere to this policy. Management at all levels is tasked with implementing, monitoring, and auditing this policy to counter human trafficking effectively.

Our Whistleblowing Policy ensures our people know how to raise concerns about any unethical practices within our business or supply chain without fear of recrimination.

SoftServe will not tolerate any practices that constitute human trafficking or slavery within any part of its global organisation, including recruitment agencies, customers, partners, and vendors. The company is committed to acting ethically and with integrity in all business dealings, implementing effective controls to prevent modern slavery. SoftServe expects the same high standards from its customers, partners, and vendors and will thoroughly investigate any indication of non-compliance.

SoftServe is dedicated to ensuring transparency in its business and external relationships, continuously working to uphold ethical standards.

DUE DILIGENCE PROCESSES



SoftServe evaluates suppliers based on their compliance with the Supplier Code of Conduct, adherence to legal and financial standards, and ability to meet environmental and social responsibility requirements. This includes verifying the supplier's legal status, checking customer references, ensuring financial solvency, and assessing qualifications, such as experience and capacity to meet SoftServe's needs. SoftServe reserves the right to request various documents, including financial statements, security audit results (e.g., ISO or SOC 2), and environmental certificates.

SoftServe may require suppliers to provide results of applicable audits, such as ISO 14000 for environmental compliance or security audits like SOC 2. SoftServe also reserves the right to check customer references, request background information, and verify financial and operational compliance through due diligence checks.

Suppliers are required to comply with all local laws and regulations where they operate. SoftServe ensures compliance by requesting documentation such as business licenses, regulatory approvals, environmental certificates, and other legal permits. Suppliers must also demonstrate compliance with financial obligations like tax payments and provide evidence of legal incorporation and solvency.

Concerns related to modern slavery can be reported under the guidelines established in SoftServe's Supplier Code of Conduct, which explicitly prohibits cooperation with suppliers involved in human trafficking, slavery, or child labor. Any concern might be raised through a feedback form on our website.

Additionally, suppliers are expected to notify SoftServe immediately if they detect any violations of this policy within their operations.

RISK ASSESSMENT AND MANAGEMENT



We take the following further steps to combat slavery and human trafficking:

- Assess all new customers and vendors using the Global Slavery Index and ask them to certify that they have taken steps to eradicate modern slavery within their own organisation and supply chain
- Incorporate anti-slavery and human trafficking obligations into agreements and subcontracting arrangements on a risk-assessed basis
- Ensure associates at all levels have a high-level understanding of the risks of modern slavery and human trafficking
- Include reference to the Modern Slavery Act 2015 in our policies and procedures

KEY PERFORMANCE INDICATORS TO MEASURE THE EFFECTIVENESS OF STEPS BEING TAKEN



1 **Supplier Risk Assessments:** Suppliers are assessed annually for modern slavery risks.

2 **Training Participation:** Staff and supplier managers are trained on modern slavery risks each year.

3 **Supplier Code Compliance:** All suppliers sign the Supplier Code of Conduct within three months of engagement.

4 **Grievance Mechanism Awareness:** Ensure awareness of reporting channels among employees and suppliers.

5 **Policy Review:** Review and update modern slavery policies annually, with board approval.

6 **CSR Reporting:** Include modern slavery KPIs in the organisation's annual CSR report, with external assurance.

TRAINING ON MODERN SLAVERY AND TRAFFICKING



As part of SoftServe's corporate social responsibility and compliance with international laws, SoftServe provides training on modern slavery and human trafficking through our code of conduct. This ensures awareness, prevention, legal adherence, and supply chain integrity. Every employee completes this training as part of the onboarding process. Our code of conduct outlines the expected behavior for associates, including interactions with customers, stakeholders, governments, and the communities where we operate, emphasising ethical standards and responsibility.

Our Whistleblowing Policy ensures our people know how to raise concerns about any unethical practices within our business or supply chain without fear of retribution.

SoftServe's zero-tolerance approach to human trafficking must be communicated to all subcontractors at the outset of the company's business relationship with them and reinforced as appropriate thereafter.

BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Act. SoftServe's Chief Executive Officer approved this statement on behalf of the SoftServe Executive Team on 22 October 2024.

Harry Propper

Harry Propper
Chief Executive Officer