

## **Modern Slavery Statement 2022**

### **Introduction**

This Modern Slavery Statement 2022 (“Statement”) has been published in accordance with the Modern Slavery Act 2015 (“Act”) and addresses the period from January 01, 2022 to December 31, 2022. It sets out the steps taken by Itransition Group Limited and its affiliates (“Itransition”, the “Company” “we”, “us” and “our”) during the 2022 financial year to prevent slavery and human trafficking from taking place in our supply chains and in any part of our business. Not all of our affiliates are subject to the Act. However, we have prepared this Statement on a consolidated basis for all related companies because we have common approaches and policies in place related to modern slavery across our business.

### **Our Business**

Itransition is a global software engineering company and a leading provider of digital solutions and consulting services and worldwide delivery infrastructure. The geography of our projects extends across forty countries, while our United Kingdom, United States and European offices house more than three thousand professionals of different specializations working daily to deliver business value through technology.

We are committed to our zero-tolerance policy for slavery and human trafficking in our supply chains. We do not tolerance to child labour, any form of forced labour and against anyone held in slavery or servitude. Itransition offers fair recruitment and employment practices and provide fairly compensation.

We believe that due to professional nature of our business, there is a low risk of engaging in slavery or human trafficking. Moreover, we are not aware of any case that might be considered as instance of human violation. Nevertheless, we recognize the importance of being vigilant, transparent and we provide appropriate risk assessment activities and additional diligence to ensure the requirements of the Act are upheld.

We do our best to enhance our internal procedures and improve our awareness in order to prevent any possibility of slavery and human trafficking within our businesses and supply chains.

This Statement is to affirm Itransition’s position that our employees, customers, contractors, suppliers, partners with whom Itransition conducts business must not engage in any business practice that would constitute trafficking in persons or slavery.

We also expect all counterparties who have, or seek to have, a business relationship with us to act in ethical and transparent manner consistent with our approach and to comply with applicable legislation and accepted industry standards.

### **Actions taken during 2022 financial year against slavery and human trafficking**

Itransition complies with all applicable slavery and human trafficking legislation, including the Act, and industry standards.

In order to identify risk in our business activities and supply chains we have taken the following actions.

### ***Our Policies and Standards***

We adopted local policies in order to assess and prevent the risk of modern slavery and human trafficking, including but not limited to Anti-bribery Policy, Sanctions Compliance Policy, Risk Management Policies. Through our policies we communicate our values and expectations, stipulating a high level for ourselves and our counterparties and making clear we do not tolerance to slavery or human trafficking. We regularly review our policies, accepted industry practices and standards.

This year we have approved Code of Conduct for our service providers and have updated Modern Slavery compliance policy and Code of Conduct for employees.

### ***Employees’ practices***

We suggest signing clear and understandable terms of cooperation with our personnel specified in the form of employment contract. Such document adheres to local labour laws and stipulates essential clauses, including working schedule, salary, rights and obligations of individuals. We provide

employment contracts to successful candidates in advance in order to give opportunity to a person to familiarize themselves with the terms and conditions of employment we offer.

The Company recognizes the right of the personnel to voluntarily terminate its employment with Itransition without any penalties. However, providing an advance notice of such termination must be necessary in some jurisdictions in accordance with local laws.

We are vigilant to the age of each candidate and do not use child labour. It's strictly prohibited to employ person under the minimum age.

Itransition pays close attention to the candidate's eligibility for employment / right to work and carry out all necessary checks in accordance with local laws and requirements to ensure that an individual can be legally employed in particular country.

Our personnel may file grievances to the employer if they feel unfair treatment or have other valid reasons without being detriment or retaliated.

We never charged our candidates any fees or costs related to recruitment/ onboarding processes.

Itransition uses best standards and constantly updates its recruitment practices to create a better experience for our candidates and personnel and make procedures more transparent and fair at all times.

### ***Due diligence & risk assessment***

Itransition aims to evaluate the reputation, performance and sustainability of our suppliers and customers based on variety indicators, including financial and business factors. We carry out a number of evaluations before and during cooperation with each supplier or customer along with meetings.

We undertake due diligence and risk assessment procedures of all contracting parties to ensure compliance with applicable laws, requirements, our internal policies and to mitigate our risks. Itransition assesses potential risk by considering key elements, including the country of origin and nature of the business.

We increased the quality of due diligence procedures of our contracting parties by making assessment more profound and detailed. We provide more extend evaluation and ask for more information if we have doubts or see any concerns.

### ***Communication and Training***

Itransition recognises the need to develop the understanding of all our employees of the potential risks and challenging in the area of modern slavery and human trafficking.

We conduct training and familiarize our employees with existing practices in order to raise the awareness and ensure that our personnel are fully informed about reasonable precautions that may be required if they suspect slavery or similar things are occurring.

### ***Reporting issues***

Our employees through local reporting mechanisms may voice concerns to any business activities or supply chains that may give rise to risk of slavery and human trafficking. All discloses will be treated on confidential basis.

### ***Going forward***

Our plan for the current year includes:

increasing our expertise in this area;

improving the visibility of our supply chains;

provision of training for directors and personnel;

assessment of existing and new contracting parties;

adding reference and requirement to comply with the Code of Conduct for our services providers in the relevant agreements;

ongoing analysis of the effectiveness of our current procedures and development of our practices, including workshops;

communication with personnel and service providers regarding the importance of taking action to prevent any cases of modern slavery and human trafficking.

There were no instances of slavery and human trafficking cases during the 2022 financial year.

We will continue to improve our compliance program on an ongoing basis.

This Modern Slavery Statement has been approved by Board of Directors of Itransition Group Limited and covers all activities undertaken by the company:

Iryna Hvardzeitsava

Name: Iryna Hvardzeitsava

Director

Date: June 24, 2023