

## **Modern Slavery Statement 2021**

### **Introduction**

This Modern Slavery Statement (“Statement”) has been published in accordance with the Modern Slavery Act 2015 (“Act”) and addresses the period from January 01, 2021 to December 31, 2021. It sets out the steps taken by Itransition Group Limited and its group companies (“Itransition”, “we”, “us” and “our”) during the 2021 financial year to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business. Not all of our group companies are subject to the Act. However, we have prepared this Statement on a consolidated basis for Itransition group because we have common approaches and policies in place relating 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 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 and any form of forced labour. 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 Itransition to be engaged 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, contractors, vendors, suppliers, and other 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 to act in ethical and transparent manner consistent with our approach and policies and to comply with relevant legislation, including the Act and accepted industry standards.

### **Actions taken during 2021 financial year against slavery and human trafficking**

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

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, Export Controls and 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.

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

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

We undertake due diligence and risk assessment procedures of our suppliers 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.

#### ***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 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:

improving of our expertise in this area;

increasing the visibility of our supply chains;

training for directors and personnel;

assessment of existing and new suppliers;

ongoing analysis of the effectiveness of our current procedures and development of our practices, including trainings.

There were no instances of slavery and human trafficking cases during the 2021 financial year.

We will update the Statement as necessary as we 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 companies within Itransition Group:



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Date: June 30, 2022