

# Modern Slavery Statement

## 1. Introduction

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We are committed to conducting our business responsibly, transparently and in accordance with the highest ethical standards. This means that we strive to carry out our business in strict compliance with all applicable laws and regulations at all times. It also means doing our best to encourage the highest standards in our supply chain. We recognise our obligations and responsibilities under the Modern Slavery Act 2015<sup>1</sup> (“the Act”) and we are fully committed to taking a robust approach to the prevention of slavery and human trafficking in the course of our business. In this statement, we describe our business and supply chain, our policies and practices, and the plans we have for continuous improvement.

## 2. Overview of our Business and Supply Chain

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We are a leading global solutions and services provider in digital transformation and cybersecurity, with our global headquarters in London. We drive our customers’ digital journey. We enable, facilitate and accelerate the digital transformation of our customers’ businesses, connecting over 150,000 enterprise customers across a comprehensive range of industries with over 6,000 best-in-class IT vendors and delivering our own services and proprietary solutions. We have over 5,000 employees globally and operate in more than 50 countries. Our IT solutions and services are delivered through three business lines:

- *Software & Cloud*, comprising (i) software solutions, which incorporate traditional licensing and subscription agreements for a full range of software products from many blue-chip software vendors; and (ii) cloud solutions, which incorporate a diverse portfolio of cloud computing services based on leading vendor technologies and services, as well as our own multi-cloud management platform;
- *Hardware*, offering the required capabilities to provide and deploy a full range of workplace, data centre and network infrastructure solutions, utilising hardware offerings from leading vendors; and
- *Services*, comprising cybersecurity, future workplace, IT infrastructure, digital solutions, Software Asset Management and our own public cloud services, as well as next generation services, such as software and application development and engineering.

We have historically focused on emerging markets, and have made significant investments in our compliance and risk management capabilities. Our main goal is to ensure we can operate in these markets in a manner which is not only compliant with regulations, but also meets the strictest standards. We benefit from strong relationships with our strategic vendors such as Microsoft, with which we have collaborated for over 25 years, as well as many other global partners including Adobe, AWS, Apple, Cisco, Dell Technologies, Google, Hewlett Packard Enterprise, HP, IBM and Oracle. These relationships span decades and

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<sup>1</sup> The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom designed to combat modern slavery.

multiple geographies, and we are proud to say that we have obtained the highest partner status with all of our strategic vendors.

### **3. Our Code and Policies**

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Noventiq holds human rights to be an essential component of our business. We reject all forms of forced or child labour, as well as contemporary slavery and human trafficking. This position applies not only to Noventiq but also to those that work on our behalf. We consider governance practices to be essential to creating and preserving value for our shareholders and other stakeholders. This includes a sound approach to corporate governance that aims to comply with all applicable laws, rules, regulations and policies, as well as adherence to our corporate values and business principles. Our governance is underpinned by a robust Corporate Ethics and Compliance Code (the “Code”) that outlines key principles and rules to help the Board of Directors and employees exercise their responsibilities, and serve the interests of Noventiq, its shareholders and society. We strive to achieve mutually beneficial supplier relationships built on common values. Our Supplier Code of Conduct sets out clearly the requirements for our suppliers from who we expect the same high levels of ethical behaviour. We encourage people to speak up about any unethical behaviour and make it easy to do this either via line management, our internal ethics team or via the confidential “Speak Up” channel, that provides an alternative and anonymous method of reporting suspected compliance violations, unlawful or unethical behaviour, or fraud.

### **4. Risk assessment, prevention and mitigation**

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Noventiq operates an Enterprise Risk Management framework of continuous improvement that enables the business to achieve its strategic objectives, meet regulatory requirements and protect its reputation. This framework enables Noventiq to identify potential modern slavery related events that may affect the organisation, to manage prioritised modern slavery related risks, and provide reasonable assurance regarding the management of these risks as part of the internal controls and compliance framework. As part of our Enterprise Risk Management framework, we will develop our risk profiling further to help us prioritise our efforts, looking at geographical locations or the types of products or services they provide to assess whether they present a higher risk. We will then look to review the high-risk suppliers in more detail to better understand the risks and mitigations we will need to put in place.

### **5. Due Diligence Processes on our Business Partners**

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We have clearly set out the requirements and guidance on due diligence that we carry out in respect of our partners in our Business Partner Due Diligence Policy. The depth and scope of the due diligence is informed by a risk analysis and other factors. We only enter into a business relationship where we are comfortable having conducted the relevant due diligence. The multistage due diligence includes legal, financial, and security audits, which assesses issues such as ongoing or historic litigation, financial statements, and background on senior management, for example, as well as enforcement proceedings, criminal and

administrative cases, or reputational concerns. These are then assessed in conjunction with our ethics and compliance team to ensure we have the required level of assurance with regards to our partners.

## 6. Compliance checks in our hiring process

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We want to ensure that we prevent modern slavery or human trafficking in our business from the outset of our recruitment process, and so our recruitment policy aligns with our principles in our Code. When hiring an employee, we always seek to comply with local regulations regarding the employment age and keep in mind the restrictions associated with the participation of minors in especially dangerous jobs and facilities. In addition, all levels of management and HR staff must ensure that the employee chooses to work for our company of their own free will and may at any time resign from it in accordance with applicable law. Once a person joins us, they're expected to live up to our standards in our Code.

## 7. Training and capacity building

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When someone new joins us to work for Noventiq, they have to complete training on our Code, as well as other mandatory compliance training and policy attestations. As a measure of how well we are doing, we had a 98% completion rate for compliance training in 2020. This mandatory compliance training and the policy attestations include clear guidance on human rights and child rights. Going forward, we'll look to enhance this training and focus on helping our people to understand and identify modern slavery and human trafficking risks, and how they can report any concerns. In addition to this, we mandate that our people complete vendor compliance training where relevant, for example, we require all our employees (commercial, marketing, engineers etc.), who directly or indirectly support our vendor relationship with Microsoft, to complete the Microsoft Supplier Code of Conduct Training, which includes a module on human rights and fair labour practices.

## 8. Scope of this statement

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This is Noventiq's first annual Modern Slavery Statement and was approved in September 2021.

## 9. Revision history

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Issue No	Version No	Issue Date	Summary of Changes
1	1.0	September 2021	Final Document
2	2.0	Feb 2023	Changes to reflect Noventiq Holdings

**S.V. Chernovolenko, Global CEO of Noventiq**

