

# Modern Slavery and Human Trafficking Statement

## 1. Introduction

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Noventiq is committed to conducting its business responsibly, transparently and in accordance with the highest ethical standards. That means we always strive to carry out our business in strict compliance with all applicable laws and regulations. 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 (“the Act”) and are fully committed to taking a robust approach to the prevention of slavery and human trafficking in the course of our business – a commitment reflected in our code of conduct, The Noventiq Way.

In this statement, we update on changes in our business, policies and practices, and we set out the actions and activities that have taken place since our last published Modern Slavery Statement, to meet our commitment to prohibiting human trafficking and forced labour, as well as plans 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, headquartered in London. We enable, facilitate and accelerate the digital transformation of our customers’ businesses, connecting over 80,000 organizations across a comprehensive range of industries with more than 600 vendors and delivering our own services and proprietary solutions. With circa. 6,400 employees globally, we transact in almost 60 countries throughout Asia, Latin America, Europe, the Middle East, and Africa. We deliver our IT solutions and services 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 public cloud services, and next generation services, such as software and application development and engineering.

More information about our business can be found [here](#).

A three-dimensional strategy to expand the company's markets, portfolio, and sales channels underpinned our company's growth. That is supported by an active approach to M&As, enabling Noventiq to take advantage of the ongoing consolidation in the industry.

We have historically focused on emerging markets, and in recent years, we have acquired several companies to expand our portfolio so we can deliver more value to our customers and come closer to customers in different regions of the world. That has also required us to invest significantly in our compliance and risk management capabilities. Our main goal is to ensure we operate in these markets in a manner which is not only compliant with regulations, but also meets the strictest ethical 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 multiple geographies, and we are proud to say that we have obtained the highest partner status with all of our strategic vendors.

In conducting our business, Noventiq has relationships with several other business partners, such as contractors, agencies and service providers. We have established a relationship of trust and integrity with them, built upon mutually beneficial factors. We only do business with partners who share our values, and we require them to adopt the same high standards and follow the spirit of our code of conduct, The Noventiq Way. Our business partner selection and onboarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, human rights and other compliance references.

### **3. Governance, 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.

Noventiq's Board of Directors works closely with our Global Chief Executive Officer, Global Chief Compliance Officer, the executive leadership team and other senior leaders across Noventiq to oversee the company's corporate social responsibility commitments, including prohibiting human trafficking and forced labour.

Our Legal, Governance and Compliance team, with the active participation and support of our business leaders, is responsible for defining and implementing our plan to raise corporate awareness of Noventiq's ethics and compliance program and policies. Through this cross-company collaboration, we work together to identify and eliminate forced labour and human trafficking risks in our operations and supply chains and implement opportunities for continuous improvement.

Our code of conduct, **The Noventiq Way**, has been updated to better outline the key business principles and rules to help the Board of Directors and our employees exercise

their responsibilities, and serve the interests of Noventiq, its shareholders and society.

We strive to achieve mutually beneficial supplier relationships built on shared values. Our **Supplier Code of Conduct** ('SCoC') sets out the requirements for our suppliers from whom we expect the same high ethical behaviour. We include the SCoC as a standard onboarding and contractual requirement for all business partners across Noventiq's supply chain.

Our whistleblowing policy, **Speak Up**, encourages people to speak up about potential compliance violations, unlawful or unethical behaviour, including any suspicion of slavery or human trafficking, without fear of retaliation. We provide different channels that make it easy to report concerns: either via line managers, Human Resources, our Legal, Governance and Compliance team or via our confidential Speak Up channel, which provides an alternative and anonymous method of reporting concerns. This platform can be used not only by our employees but also by our business partners and customers.

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

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Noventiq operates an Enterprise Risk Management methodology and framework of continuous improvement that supports the business in achieving its strategic objectives whilst complying with applicable laws and regulations. This framework enables our people 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 our internal controls and compliance framework. We continuously review our approach to assessing risk in our global supply chains, to take account of emerging challenges and updated information sources.

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

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Understanding who Noventiq's business partners are is key to helping Noventiq address legal and commercial risks. We cannot conduct business with an anonymous or fictitious company or with any business partner with an unclear identity or business activities. In order to understand who our business partners are, and the degree of risk they present, we conduct an appropriate level of due diligence before entering into any business with them. Our **Business Partner Due Diligence Policy** sets out certain requirements and guidance to ensure the appropriate level of due diligence is carried out. We conduct a thorough analysis of all potential business partners, including sanctions screening, before formalizing any relationship. The depth and scope of the due diligence is informed by a risk analysis and other factors including, but not limited to, geography, services, and history of non-compliance, among others. Any red flags are escalated to our Legal, Governance and Compliance team for further assessment. The frequency and nature of ongoing periodic checks are informed by multiple factors and indicators.

We also undertake extensive financial, legal and compliance due diligence on our M&A targets. The information gathered in this process allows us to thoroughly assess human rights and labour risks prior to deal completion.

## 6. Compliance checks in our hiring process

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We strive to ensure that we prevent modern slavery and human trafficking in our business from the outset of our recruitment process, and so our recruitment policy aligns with the principles in our code of conduct, The Noventiq Way. When hiring an employee, we always seek to comply with local regulations regarding the employment age and ability to work. In addition, all levels of management and Human Resource 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 comply with our code of conduct, The Noventiq Way.

The hiring process at Noventiq requires all new joiners to attest that they have read and understood our code of conduct and relevant global policies and guidelines associated with their location and role. They are also required to attend onboarding training which focuses on the importance of following our values, principles, policies and guidelines, and we reinforce awareness around speaking up. Human Resources keeps track of completion rates to ensure this requirement is fulfilled.

## 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 of conduct, The Noventiq Way, as well as other mandatory compliance training and policy attestations. In addition to this, we mandate that our people complete vendor compliance training where relevant, for example, we require all our employees 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.

All our employees must complete annual mandatory compliance training. In October 2023, we will roll out our new mandatory compliance training on our code of conduct, The Noventiq way. Furthermore, our new eLearning platform 'Viva Learning' and our partnership with LinkedIn Learning provides our employees with additional resources to understand and identify modern slavery and human trafficking risks.

## 8. Scope of this statement

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Noventiq's first annual Modern Slavery Statement and was approved and published in September 2021. This statement was approved by a meeting of the Noventiq Board of Directors on 15 September 2023.

**Hervé Tessler**  
**Global Chief Executive Officer, Noventiq**

**September 2023**