SoftwareOne

GLOBAL MODERN SLAVERY STATEMENT 2025

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Introduction

SoftwareOne is committed to upholding human rights and ethical business practices by preventing modern slavery and human trafficking within our operations and working to eradicate them from our global supply chains. This Modern Slavery Statement outlines our ongoing efforts to combat modern slavery and aligns with the values and commitments expressed in our publicly available Codes of Conduct.

Our Company

As a leading global provider of software and cloud solutions, SoftwareOne recognizes the responsibility we bear in advancing human rights and ethical standards across our business operations.

Commitment to Human Rights and Global Frameworks

SoftwareOne is committed to upholding human rights, as outlined in the UN Universal Declaration of Human Rights and other internationally recognized frameworks, including the UN Guiding Principles on Business and Human Rights.

SoftwareOne continues to integrate modern slavery and human rights considerations into its broader ESG framework. More information on our processes and quantitative data on this topic, such as any incidents, are included in our ESG report, in line with the EU Corporate Sustainability Reporting Directive.

SoftwareOne has implemented measures such as training and communication on our Code of Conduct with a zero-tolerance policy, a Supplier Code of Conduct, due diligence on suppliers, and regular employee training programmes on this topic.

Our focus has been to ensure that we create the most ethical working environment for our employees, partners and clients. Given the nature of our business, our goals and policies on human rights have been focused on the impact we have on our supply chain.

At SoftwareOne, our focus regarding human rights is on modern slavery in our supply chain. Given the nature of our business, other areas of human rights concerns are not relevant. For example, contamination of drinking water supplies is not relevant due to the fact that SoftwareOne are not a manufacturing organisation.

To determine this, we reviewed our software and cloud partners against the UN Global Compact Industry Specific Risk Factors and concluded that there are no significant cases relating to these areas.

Our Supply Chain

We acknowledge the risks associated with modern slavery within complex global supply chains. SoftwareOne implements stringent processes to evaluate, monitor, and manage our suppliers' adherence to our ethical standards. Our due diligence assessments ensure suppliers align with our values and comply with anti-slavery and human trafficking laws.

To uphold this commitment, we have the Integrity Line, a dedicated reporting channel, designed for anyone associated with SoftwareOne to report discrepancies or concerns and available to all employees at Software One | Home (integrityline.io)

It offers a secure, confidential, and anonymous platform to report misconduct, ethical violations, or behaviours that contravene our company values, including concerns on our Supply Chain.

In addition to our Integrity Line, SoftwareOne offers an external reporting hotline dedicated to external stakeholders.

The hotline offers multi-language support, and it is operational 24/7 and provided at no cost for calls made within the country. For more information, please visit our website.

Third-Party Risk Management Programme

SoftwareOne has a robust Third-Party Risk Management Programme designed to identify and mitigate risks within our supply chain, including modern slavery via the **Integrity Next** portal. This process identifies suppliers that pose the highest risk based on factors such as location and industry. A questionnaire evaluates the supplier's compliance with various standards, including Data Protection, ESG, Risk, Compliance, Procurement, and Data Security. The questionnaire provides a comprehensive assessment of the supplier's practices, policies, controls, allowing for a consistent and objective evaluation of supplier risk. This programme encompasses:

- ➤ **Risk Assessment:** Regular assessments identify vulnerabilities, enabling prioritized actions to mitigate risks effectively.

- ➤ **Supplier Code of Conduct:** Our Supplier Code explicitly prohibits forced labour, child labour, and any form of modern slavery.

- ➤ **Due Diligence:** We conduct thorough due diligence on potential suppliers to evaluate their commitment to human rights and ethical practices.

- ➤ In 2024, we continued to enhance our third-party due diligence process with **Integrity Next**. We expanded our supplier coverage, onboarding our A, B and C category suppliers (some new and some current). Since we launched this process in 2023, we have monitored 8,565 suppliers and 2,366 have been assessed for ESG-related topics, amongst them 1,937 were assessed on environmental impacts and 1,894 on social impacts.

- ➤ In line with German Supply Chain Law all 5,416 of our German suppliers were uploaded to the IntegrityNext portal and underwent a risk analysis based on country and industry risks. During 2024, we identified and reviewed 295 A and B suppliers with an ESG lens and invited 191 suppliers to our due diligence assessment via Integrity Next.

Continuous Improvement and Training Commitment

SoftwareOne is committed to continuous improvement in our approach to combating modern slavery. To support this:

- ➤ We regularly review and update our procedures to align with evolving regulations and best practices.

- ➤ Ongoing training and educational resources are provided to relevant personnel to raise awareness of modern slavery risks and ensure effective risk mitigation strategies are in place.

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- ➤ Topics related to modern slavery are addressed in our Code of Conduct, to ensure that employees, partners, and our supply chain uphold the highest ethical standards and are protected from any forms of injustice.
- ➤ In 2024, we focused on targeted training tailored to specific job roles and departments, designed to address areas of risk and compliance. As part of this effort, we launched the Compliance Data and Security Month, which yielded excellent completion rates from 85% in 2023 to 95% completion. Additionally, we introduced two targeted modern slavery trainings for key teams involved in procurement and service delivery, ensuring they are equipped to identify and mitigate potential risks effectively.

Conclusion

SoftwareOne remains resolute in our commitment to combatting modern slavery and human trafficking. We will persistently collaborate with our employees, suppliers, and stakeholders to uphold human rights and ethical standards across our global operations and supply chain.

Signed on behalf of SoftwareOne:

Raphael Erb, CEO

Appendix: Overview of the Modern Slavery Legislation applicable to SoftwareOne

United Kingdom:

Modern Slavery Act 2015: This legislation requires businesses with an annual turnover exceeding £36 million to produce a modern slavery statement detailing the steps taken to prevent modern slavery in their operations and supply chains.

Australia

Modern Slavery Act 2018: Similar to the UK Act, this requires businesses with an annual turnover of $100 million or more to report on their efforts to address modern slavery risks in their operations and supply chains.

United States

Trafficking Victims Protection Reauthorization Act (TVPRA): A federal law aimed at preventing human trafficking and assisting victims. It includes provisions that address labour trafficking, sex trafficking, and protection for victims.

California Transparency in Supply Chains Act (SB 657): Requires certain companies doing business in California to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains.

European Union

Directive 2011/36/EU: Sets out measures to prevent and combat trafficking in human beings, protecting victims' rights and prosecuting offenders.

EU Strategy towards the Eradication of Trafficking in Human Beings 2021-2025: Aims to prevent trafficking, protect victims, and support prosecutions.

The Act on Corporate Due Diligence Obligations in Supply Chains (the "Supply Chain Act") which came into force on 1 January 2023. The law regulates the responsibility of German enterprises to respect human rights in global supply chains.

Canada

The Immigration and Refugee Protection Act: Addresses human trafficking through provisions concerning trafficking offenses, penalties, and support for victims.

The Victims Bill of Rights: Provides additional support and protection for victims of human trafficking.

International Frameworks

United Nations Guiding Principles on Business and Human Rights: Provides guidance for businesses on their responsibility to respect human rights, including issues related to modern slavery.

International Labour Organization (ILO) Conventions: Various conventions address forced labour, child labour, and human trafficking, including Convention 29 and Convention 182.