

Modern Slavery Act Statement

Introduction

This statement sets out the actions that Sopra Banking Software Limited ("SBS UK") has taken to understand the potential risks to its business from modern slavery and to ensure that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to the financial year ending 31st December 2023.

SBS UK is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

SBS UK recognises that it has a responsibility to take a robust approach to preventing slavery and human trafficking at all times and continues its activity to identify and address the risks of modern slavery in its operations and supply chains.

Organisational structure, business and supply chains

SBS UK is a wholly-owned UK subsidiary of Sopra Steria Group ("Sopra Steria"). Together with the other subsidiaries, SBS UK forms part of Sopra Steria's Sopra Banking Software division ("Sopra Banking Software").

Sopra Steria is headquartered in Paris, France and its shares are listed for trading on Euronext Paris. A simplified group structure is published in Sopra Steria's 2023 Universal Registration Document.

SBS UK provides banking software and IT services to financial services organisations in the UK and throughout Europe and employs around 510 people across 4 main locations in the UK.

Sopra Banking Software designs technology solutions for financial institutions in more than 80 countries worldwide.

Sopra Steria, a major actor in Europe's consulting, digital services and solutions market, helps its clients drive their digital transformation and obtain tangible and sustainable benefits, thanks to one of the most comprehensive portfolios of offerings on the market, encompassing consulting and systems integration, industry and technology-specific solutions, hybrid cloud and technology services, cybersecurity and business process services. With 50,000+ professionals in 30 countries Sopra Steria is trusted by leading private and public organisations to deliver successful transformation programmes that address their most complex and critical business challenges.

SBS UK's supply chains primarily comprise suppliers within the UK or Europe. SBS UK avoids contracting with suppliers or sub-contractors located in areas where there is a higher risk of slavery and human trafficking than there is in the UK or Europe. However, we recognise that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking, and we expect our suppliers to prevent and avoid slavery and human trafficking in their supply chains in higher risk countries. We also recognise that slavery and human trafficking does occur in the UK and Europe.

Services are also provided to SBS UK from other Sopra Steria entities, including Sopra Banking Software Solutions India Private Limited ("SBS India"). SBS India is a wholly owned subsidiary of Sopra Steria and is subject to and complies with relevant group policies, further details of which are provided below. The services provided by SBS India primarily relate to research and development and professional services.



Policies and procedures

The policies and procedures of SBS UK and Sopra Steria which prevent slavery and human trafficking in their operations and supply chain include the following.

- **Code of Ethics** – Sopra Steria has signed the United Nations Global Compact, Advanced Level. The Code of Ethics describes Sopra Steria’s commitment to the 10 principles of the UN Global Compact pertaining to human rights, international labour standard, environmental protection and tackling corruption. The Code of Ethics applies to all Sopra Steria entities and employees.
- **Group Purchasing Procedure** – The Group Purchasing Procedure refers to the same 10 principles of the UN Global Compact and requires that suppliers also commit to them. The Purchasing Procedure applies to all Sopra Steria entities and the rules and principles set forth in it apply to all Sopra Steria employees and purchases.
- **Supplier Code of Conduct** – The code of conduct states that it should be applied to all contractual relationships between Sopra Steria entities and their suppliers. The code of conduct and includes detailed supplier commitments with regard to: adherence to all internationally recognised legislation, regulations and standards on human rights and fundamental freedoms; diversity, equal opportunities and respect for people; prohibition of forced labour; respect for working conditions.
- **Sopra Banking Software Partnerships Directory** – The Sopra Banking Software Partnerships Directory has been updated to support a procurement approach in which checking our suppliers’ commitment to combating modern slavery and people trafficking is integral, including the use of the Supplier Code of Conduct.
- **Sopra Banking Software UK Supplier Management Policy** – SBS UK’s supplier management policy has been updated to support a procurement approach in which checking our key suppliers’ commitment to combating modern slavery and people trafficking is integral, including the use of the Supplier Code of Conduct.
- **HR policies** – Ethical standards are set out in SBS UK’s HR policies including the due diligence processes outlined below. SBS UK’s Whistle Blowing Policy, Starters Transfers and Leavers Policy and Recruitment Policy have been reviewed and updated to ensure compliance with the Modern Slavery Act 2015.

Due Diligence Processes

SBS UK’s compliance with relevant employment legislation promotes human rights and ensures that:

- Our employees are not being exploited, are safe at work and that relevant health and safety and human rights laws are adhered to, including freedom of movement and communications; and
- Our contracts of employment and our Leaving Employment policy allow employees to serve notice of termination of their employment at any time.

SBS UK’s pre-employment screening process ensures that all candidates have a right to work in the UK and we would not seek to withhold any individual’s identity documents.

All SBS UK employees are paid at least national minimum wage and we adhere to all relevant legislation in respect to working time, time off, minimum amounts of holiday, time off for personal emergencies or sickness and maternity/paternity leave. SBS UK has been accredited as a Living Wage Employer by undergoing certification from the Living Wage Foundation. As such, we have committed to paying the Real Living Wage (at the applicable level in the relevant geographical area). The Living Wage is a voluntary higher rate of base pay than the National Minimum Wage. It applies to all employees over the



age of 18 and is not tiered in the manner that National Minimum Wage is tied to age-groups. We also keep to a minimum any use of zero hours contracts and use these only in circumstances where the flexibility provided is beneficial to both employee and employer.

For UK specific matters, the HR Director is responsible for HR policies and training, and the head of Industrial Direction is responsible for local supply chain management.

Sopra Steria is proud to be a signatory to the United Nations Global Compact, including Principle Four: Labour, and aligns to the UN Sustainable Development Goals, including Goal 8 - Decent work and economic growth. To ensure that we are aligned with the company's values for an ethical business, we annually assess ourselves using the EcoVadis Corporate Social Responsibility (CSR) assessment. This allows us to benchmark ourselves against our competitors. We have received a Platinum award, for the third year in a row, progressing from an "Advanced" score to "Outstanding", ranking us in the top 1% of companies assessed against the 21 different sustainability criteria, including our response to modern slavery.

In respect to local supply chain management, the ability of suppliers to sign up to the Supplier Code of Conduct and publish their own Modern Slavery Act statement is an evaluation criteria used for identifying key suppliers or strategic suppliers, as set out in the Sopra Banking Software UK Supplier Management Policy and the Sopra Banking Software Partnerships Directory.

Risk Management

SBS UK does not consider its provision of IT services to financial services companies as a service at high risk of being connected with activities more commonly associated with modern slavery and people trafficking, due to our services being provided by a highly skilled workforce of IT professionals. Apprentices undergoing apprenticeship schemes will be protected by our compliance with relevant legislation and regulations. However, any concerns of managers or employees in respect to modern slavery, people trafficking or compulsory labour can be reported and escalated confidentially with surety. Any person raising such concerns will be protected under our Whistleblowing Policy.

Performance indicators

The performance indicators used to measure effectiveness of SBS UK's measures to combat modern slavery have been established as follows:

- For key and strategic suppliers, the number of key and strategic suppliers who have either published their own modern slavery act statement on their website or signed the Supplier Code of Conduct;
- For internal training, the number of new employees who have been directed to relevant Human Resources policies during induction.

Sopra Banking Software Limited's target for 2024 is to achieve as close as possible to 100% for both performance indicators.

Training

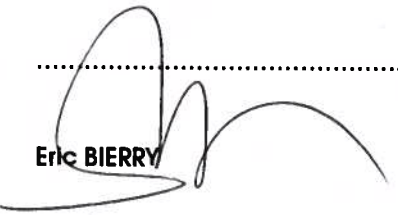
The board of directors and the senior executive management staff of SBS UK have been briefed on the importance and practical considerations of the Modern Slavery Act and are committed to upholding the values described in this statement. This statement and other relevant information will be made



available to all employees upon publication and on an ongoing basis including through the new starters process as governed by the Starters, Transfers and Leavers Policy.

Declaration

This statement has been approved by the board of directors of SBS UK, is made in accordance with section 54(1) of the Modern Slavery Act 2015, and constitutes SBS UK's slavery and human trafficking statement for the financial year ending 31 December 2023.

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