



## MODERN SLAVERY ACT STATEMENT

### INTRODUCTION

Xebia recognises that human rights and human dignity are of paramount importance without any equivocation. To this end, Xebia has an Anti-Slavery and Human Trafficking Policy, which incorporates the terms of the UK Modern Slavery Act 2015. This Statement complements our Modern Slavery Act policy.

Xebia recognises that modern slavery is a crime and morally and legally repugnant. Any breach of anti-slavery and human trafficking legislation is criminal and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Xebia is committed to acting ethically and with integrity in all our business dealings and relationships, and we have strong policies to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This means that we at Xebia do our utmost to raise awareness of the dangers of modern slavery (in all its many guises) within our company and also amongst our suppliers and customers. We also take all reasonable steps to mitigate any risk of supporting these abhorrent practices within our supply chain.

Xebia is committed to ensuring transparency in our policies on this subject and ensures full compliance with anti-slavery and human trafficking legislation across the globe, including Modern Slavery Act 2015 and the disclosure obligations therein.

### OUR BUSINESS

Xebia is a global Software Engineering and IT consulting company with offices in the Americas, Europe, the UK, India, Southeast Asia and the Middle East. We provide high-quality consultancy and offshore and nearshore services.

Our Company offers digital transformation and process automation, product engineering, digital integration, intelligent automation, cloud & infrastructure management services, and BPO solutions. More information is available on our website: <https://xebia.com/uk/>.

### DUE DILIGENCE ON SUPPLY CHAIN AND CORPORATE RISK ASSESSMENT

As a part of Xebia's due diligence, all our suppliers and subcontractors are checked by our various internal Departments and stakeholders for any breaches of law, including the Modern Slavery Act of 2015. We also make enquiries about corporate history and any misconduct or reputational probity.



We have a review process in order to ensure that our supply chain does not breach the policies. Our review can identify and assess potential risk areas and maintain a register detailing the same.

We expect high standards from all our subcontractors, suppliers and other business partners and have made this transparent to our significant suppliers wherever possible.

In addition, we require all vendors to confirm that they acknowledge and comply with the Modern Slavery Act as part of our standard contracting agreements.

We endeavour to ensure that our sub-contractors adhere to our policies and governance processes.

Xebia asks all its Suppliers and other stakeholders to certify annual compliance. If there are any stakeholders unwilling or otherwise unable to certify so, we remind them of their obligations and make them aware of the legislation before we engage with them.

#### **COMMUNICATION, AWARENESS AND POLICIES**

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We have an Anti-Slavery and Human Trafficking Policy, and we ensure that our employees are made aware of modern slavery and how to recognise it, and we encourage them to bring any concerns about the issue to the attention of the Company management.

We also have a Whistle-blower Policy which encourages reporting concerns regarding modern slavery anywhere internally or within our supply chain.

#### **SUPPLIER AGREEMENTS AND PERFORMANCE MONITORING**

Xebia asks all its suppliers to warrant that they are fully compliant with, and adhere to, anti-modern slavery requirements as well as the reporting of any recognised Modern Slavery Act 2015 practices or issues. Xebia reminds suppliers to be vigilant on an ongoing basis.



## SUMMARY

Xebia takes a holistic approach to the issue of modern slavery and human trafficking. Our various departments (Legal, HR, Procurement) work together to ensure that everyone within the organisation is aware of the subject and vigilant in recognising it. We aim to keep the highest standards in our processes to underline our commitment to anti-slavery.

This Statement is signed by me on behalf of the Company.

A handwritten signature in purple ink, appearing to read 'M. Arya' with a checkmark at the end.

Madhur Arya  
Director: Xebia UK  
May 1<sup>st</sup>, 2023