

Modern Slavery Statement

2020-2021



The world is how we shape it

sopra  steria

INTRODUCTION

Modern slavery is still prevalent all across the world, and even in the UK the number of victims identified is increasing year on year, and the estimated number of real victims is much higher.

At Sopra Steria we have a responsibility to ensure that there is no slavery or human trafficking in our own business and our supply chains. This statement outlines the policies, processes and sets out the actions that we have taken to understand the potential risks to our business from modern slavery. This statement relates to the financial year ending 31st March 2021, and is in accordance with national laws.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.





With over 46,000 professionals in 25 countries, Sopra Steria Group is trusted by leading private and public organisations

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Sopra Steria Group is a European leader in consulting, digital services and software development, and we help our clients drive their digital transformation to obtain tangible and sustainable benefits. Sopra Steria Group places people at the heart of everything it does and is committed to making the most of digital technology to build a positive future for its clients. With over 46,000 professionals in 25 countries, Sopra Steria Group is trusted by leading private and public organisations to deliver successful transformation programmes that address their most complex and critical business challenges.

Sopra Steria Group are proud to be a signatory to the United Nations Global Compact, including Principle Four: Labour, and we align our company 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, and in 2020 we received a Platinum EcoVadis award, ranking us in the top 1% of companies assessed against the 21 different sustainability criteria, including our response to Modern Slavery.

This statement covers the activities of Sopra Steria Limited in the United Kingdom. Sopra Steria Limited is the majority shareholder of NHS Shared Business Services Limited and Shared Services Connected Limited. The ultimate parent company of Sopra Steria Limited is Sopra Steria Group SA, based in Paris, France.

Our Supply Chain primarily comprises of organisations within the UK and Europe. 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, including in these higher risk countries.



In 2020 we received a Platinum EcoVadis award, ranking us in the top 1% of companies... including our response to Modern Slavery.

SOPRA STERIA LIMITED'S APPROACH TO PREVENTING SLAVERY AND HUMAN TRAFFICKING

RELEVANT POLICIES

The following policies define the steps we have taken to prevent slavery and human trafficking in our operations and supply chain. In the last reporting year, we amended our Sustainability Procurement Policy, and improved our Diversity and Inclusion Policy.

- **Code of Ethics** - applicable to all of our employees including those in India. The Code of Ethics describes our commitment to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour.
- **Sustainable Procurement Policy** - Amended in 2020, this policy applies to all procurement activities in the UK and requires we adhere to social and ethical standards, and human and labour standards in the procurement of goods and services. Our standard terms and conditions for our suppliers also requires suppliers to uphold human and labour rights and (in the UK) to prevent slavery and human trafficking in their own operations and their supply chains.
- **Sustainability Policy** - applicable to all of our employees, this policy explicitly commits us to preventing slavery. It also requires us to uphold human and labour rights.
- **Policy for Recruitment and Selection** - We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. In the UK, a requirement to comply with the Modern Slavery Act 2015 is contained in our supplier contracts and existing suppliers will be required to comply on renewal.
- **Equal Opportunities and Diversity Policy** - our commitment to establishing and maintaining a working environment which is free from discrimination and which values all employees as individuals.

DUE DILIGENCE: PROCESSES AND PRACTICES

Within our own operations

We are committed to preventing slavery and human trafficking, and have a number of policies and processes in place to ensure that our employees are not being exploited and that they have a safe and supportive working environment.

In order to ensure that there is no slavery or human trafficking within our own operations we have taken the following steps:

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave our employment. Employees are free to serve notice at any time.
- We carry out verification of an employee's identity and ongoing right to work in the UK.

- We do not withhold any employee's identity documents or passport during their employment.
- We comply with or provide enhanced versions of all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.
- We respect the right of individual employees to join a trade union and, where groups of employees elect to be represented by a trade union, we are committed to engaging with trade unions in pursuit of harmonious industrial relations.
- We have introduced a communication and training campaign around Modern Slavery, to make employees aware of their rights and how to spot and report signs of modern Slavery.

Furthermore, in the reporting year we have also taken the following steps:

- We have worked with industry bodies to work on best practices on Modern Slavery, and then we have embedded that into our policies and work.
- We have provided free support guidance to SME's (Small and Medium Enterprises) on how to improve their Modern Slavery statements, through consultancy days.
- Became Living Wage accredited, and we voluntarily pay all of our employees, (including all third party contractors) at least the Living Wage Foundation wage, as a minimum.

A suspected case of slavery or human trafficking would be raised by an employee, using the procedures outlined in the Business Integrity Policy. To date we have not had any instances of an employee reporting a suspected case of modern slavery within our company.



We are Living Wage accredited, and we voluntarily pay all of our employees at least the Living Wage Foundation wage

We annually procure around £164m of goods and services through our supply chain, of which 94% is with organisations in the UK

Within our supply chain

We recognise that our supply chain contributes the greatest risks for Slavery and Human Trafficking and as such, our relationship with the supply base is a critical part of our commitment to eliminating modern slavery. We annually procure around £164m of goods and services through our supply chain, of which 94% is with organisations in the UK, 5% with companies within the European Union and North America and 1% from the rest of the world.

We ensure that during all stages of the procurement life cycle, we consider modern slavery risks. If there is a suspected case of Modern Slavery, we will ensure that the correct procedures are taken and the victims are supported. We will work with suppliers through our policies and service-level agreements, and deal with any issues on a case to case basis.

Key categories of spend comprise:

- IT and Telecom equipment.
- Consultancy and Contractors.

We undertake robust due diligence when taking on all new suppliers, and regularly review our existing supply chain.

Our supply chain engagement programme for all suppliers on modern slavery includes:

- A sustainability assessment for every new supplier during the on boarding process, which includes acceptance of our Supplier Code of Conduct. This prohibits slavery and human trafficking, and requires them to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains, and the provision of evidence of their sustainability processes and policies.
- Working with suppliers, informing them of best practice, providing advice and guidance on their approach and working with them on implementing action plans for improvements.
- Invoking sanctions - We have made improvements to our process for sanctions, in the case of a suspected issue, we proactively take action and do not apply a standard process in our supply chain. We will work with our suppliers to investigate, and allow the correct procedures to be followed within a given time. If these standards are not met then, we will then look into the termination of business relationships or contracts - against suppliers that fail to improve their performance in line with an action plan or materially breach our Terms and Conditions.



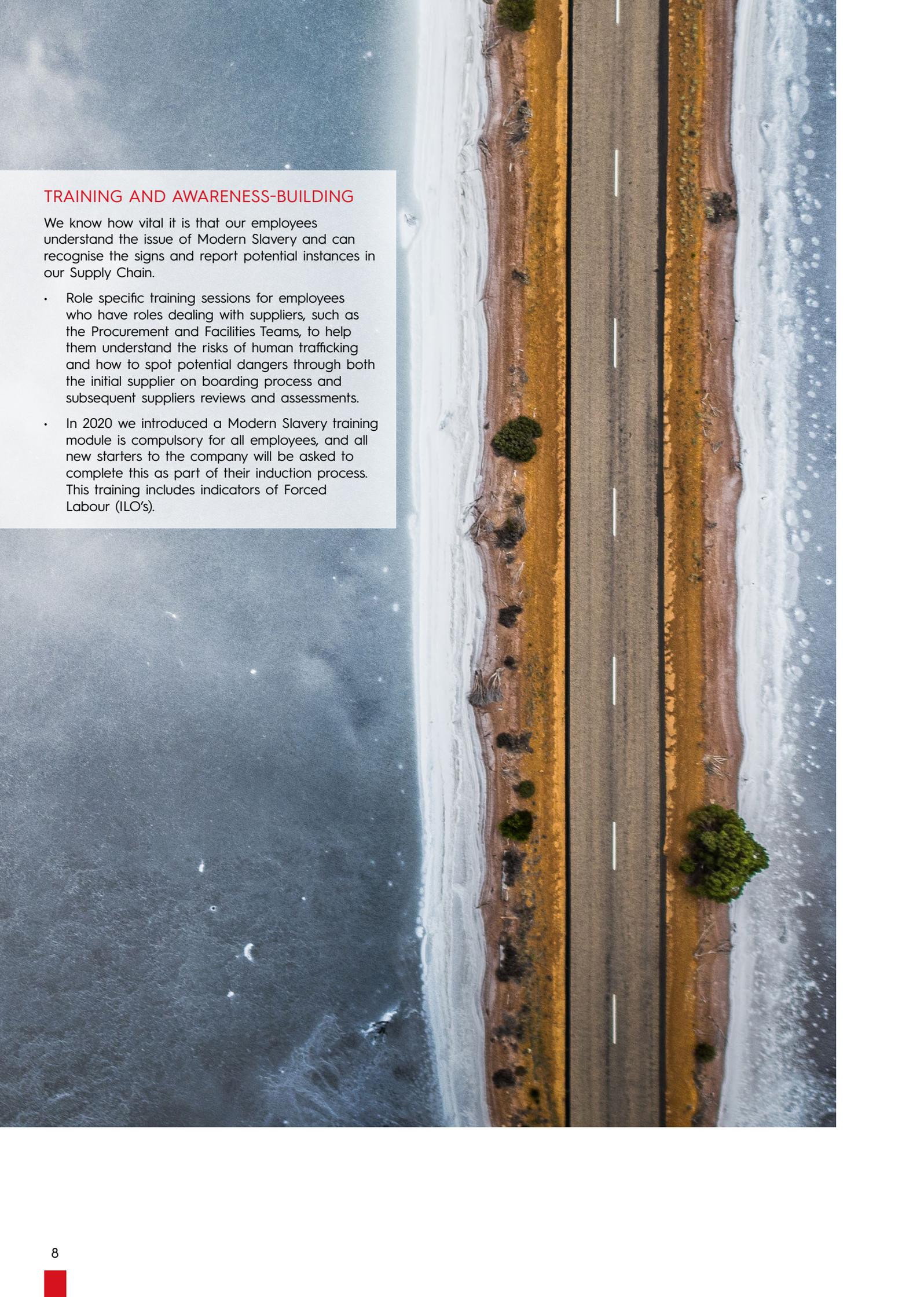
- Reviewing modern slavery during all stages of the procurement process including tender evaluation, contract award and in-life contract management.
- Becoming a signatory of the Prompt Payment Code, which sets standards for payment best practice, and reduces the risk of late and extended payments, in turn reducing the pressures on suppliers that could lead to Modern Slavery. We have increased our commitment to fulfilling the prompt payment code. We currently pay 97% suppliers in accordance with its principles.
- Implementing clauses around debt bondage (the most common form of modern slavery), into our supplier code of conduct. These clauses prevent forced work to pay off debts.

In the reporting year we have:

- We have offered electronic invoicing to all suppliers. This will help to improve the payment process and help us achieve our goal to pay all suppliers to terms.
- Improved the way our Modern Slavery Policy is made available to workers in our supply chain. There are now dedicated pages on our 'Working with Suppliers' link on our external website. This includes information on what to do if there is a suspected case of Modern Slavery.

We use a Sustainability Risk Matrix, which covers more than a dozen key sustainability risk areas and determines levels of risk by supply category. Using the Sustainability Risk Matrix we broadly map the supply chain to assess particular products or geographical risks of modern slavery and human trafficking. We identify suppliers in categories. Suppliers with higher levels of risk, and those that we maintain spend above a certain threshold. They then participate in our supplier enhanced engagement process, which includes a more thorough assessment of their sustainability management processes, including those for the prevention of slavery and human trafficking.

We are continually making improvements to our ongoing monitoring and assessments of suppliers and work closely with key suppliers to share best practice and provide opportunities to build open discussions and improve existing safeguards.

An aerial photograph of a coastal road. The road is a two-lane asphalt road with white dashed lines, running vertically through the center of the image. To the left of the road is a sandy beach with some sparse vegetation and a few trees. To the right of the road is the ocean with white-capped waves breaking against the shore. The sky is a pale, overcast blue.

TRAINING AND AWARENESS-BUILDING

We know how vital it is that our employees understand the issue of Modern Slavery and can recognise the signs and report potential instances in our Supply Chain.

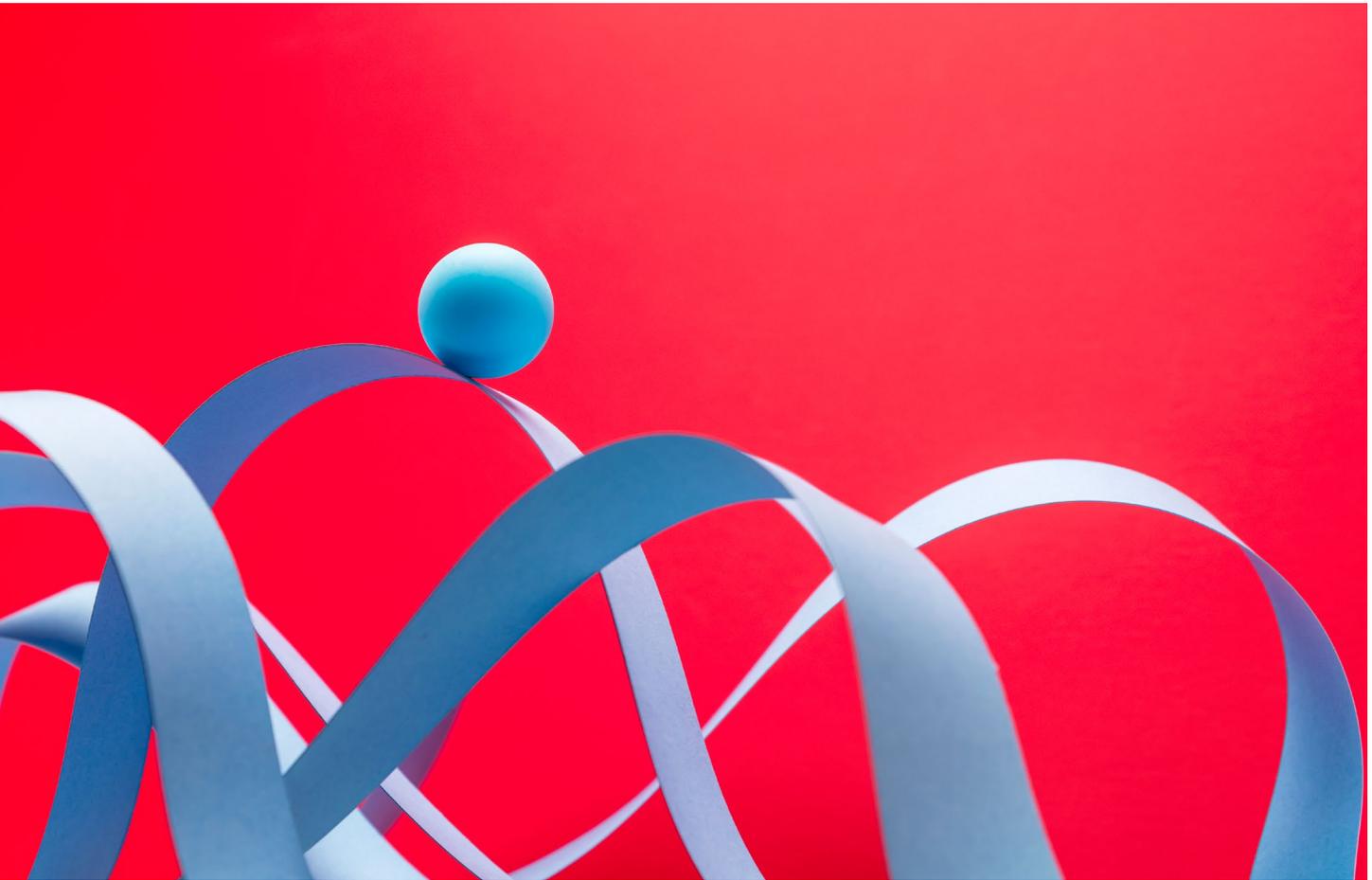
- Role specific training sessions for employees who have roles dealing with suppliers, such as the Procurement and Facilities Teams, to help them understand the risks of human trafficking and how to spot potential dangers through both the initial supplier on boarding process and subsequent suppliers reviews and assessments.
- In 2020 we introduced a Modern Slavery training module is compulsory for all employees, and all new starters to the company will be asked to complete this as part of their induction process. This training includes indicators of Forced Labour (ILO's).

PERFORMANCE INDICATORS

We have introduced the following key performance indicators (KPIs) in response to the introduction of the Modern Slavery Act 2015. The indicators and activities are reviewed at least annually .annually.

- Supplier engagement:
 - 100% of our suppliers to have agreed to the supplier code of conduct.
 - 100% of new suppliers have undergone a sustainability assessment during the on boarding process.
- Modern Slavery Training:
 - Ensure that 100% of all existing and new employees, and contractors complete the compulsory Modern Slavery training.
 - Ensure that 100% of employees who have roles dealing with suppliers, such as the Procurement Team receive ongoing updates and notifications regarding business & human rights, and specifically modern slavery.





RESPONSIBILITY

Responsibility for our initiatives addressing slavery and human trafficking are as follows.

POLICIES:

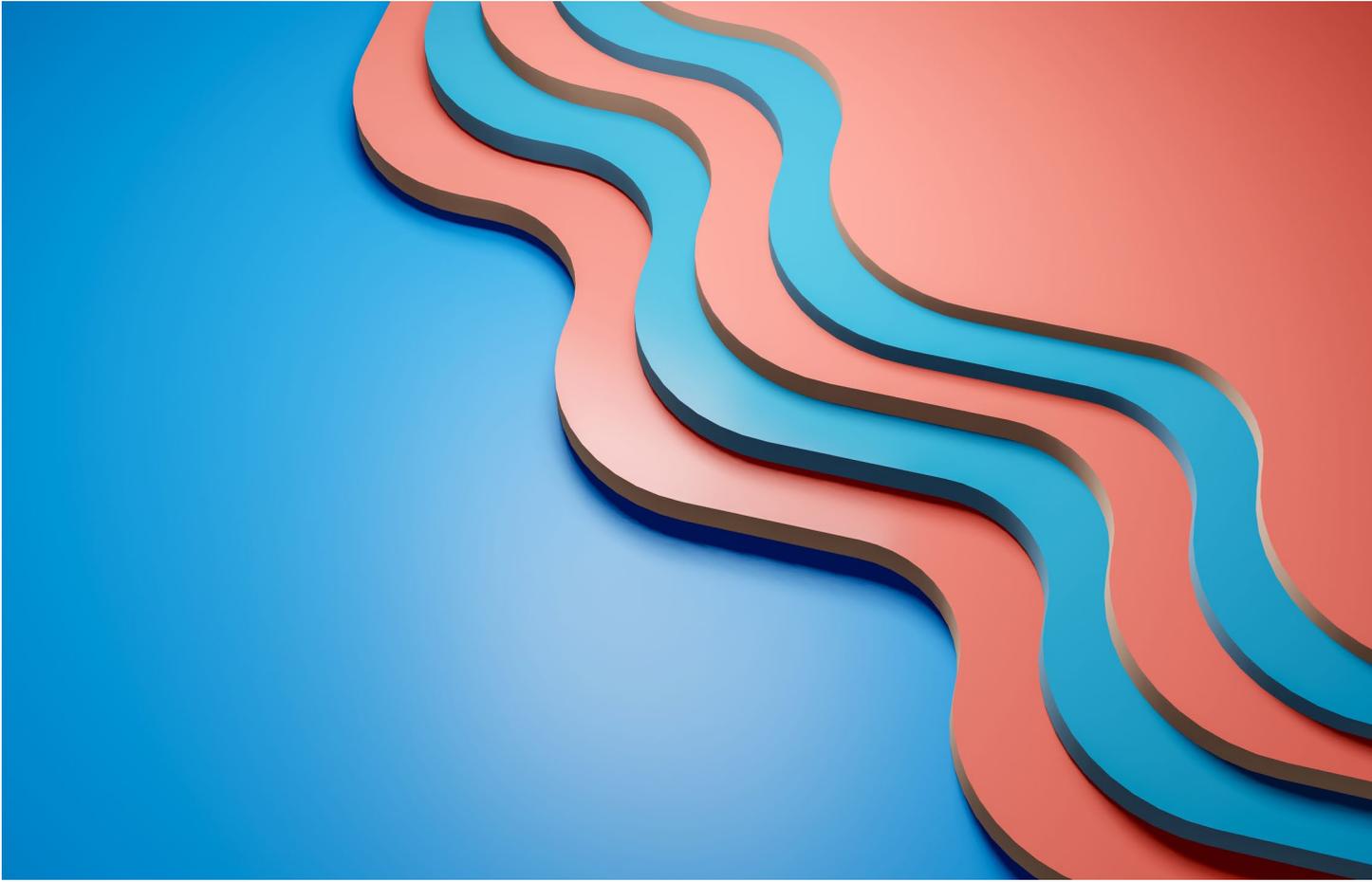
Responsibility for policies are:

- Human Resources – Director of Human Resources, Sopra Steria Limited, for policies related to the prevention of slavery and human trafficking in our own operations
- Chairman Sopra Steria Group SA (France), for the Sopra Steria Group Code of Ethics
- Procurement – Head of Procurement, Sopra Steria Limited, for policies related to the prevention of slavery and human trafficking in our supply chain and for the Sustainability Risk Matrix.

DUE DILIGENCE:

In our own operation, the Human Resources team are responsible for ensuring that all due diligence checks are undertaken during all the stages of employment, from initial recruitment onward.

In our Procurement and supply chain management activities, our Procurement management team are responsible for undertaking due diligence activities, and for such activities related to slavery and human trafficking, they take input from other parts of the business, including Legal, HR and Sustainability .



BOARD APPROVAL

Sopra Steria Limited's Board of Directors has approved this statement for the Financial Year ending on 31st March 2021.

Director's signature:

A handwritten signature in black ink, appearing to read 'J Neilson', written over a light blue background.

Director's name: John Neilson

Date 07 May 2021

ABOUT SOPRA STERIA

Sopra Steria is a European leader in digital transformation providing one of the most comprehensive portfolios of end to end service offerings on the market: Consulting, Systems Integration, Software Development, Infrastructure Management and Business Process Services. Sopra Steria is trusted by leading private and public organisations to deliver successful transformation programmes that address their most complex and critical business challenges. Combining added value, innovation and high-quality services, Sopra Steria enables its customers to make the best use of information technology. With 46,000 employees in 25 countries, Sopra Steria generated revenue of €4.3 billion in 2020.

Sopra Steria Group (SOP) is listed on Euronext Paris (Compartment A) - ISIN: FR0000050809

For more information, please visit our website www.soprasteria.co.uk

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