

# Modern Slavery Statement

2025-2026

## Introduction

**Modern slavery continues to be a serious global issue. Due to its hidden nature, it is extremely difficult to fully understand the scale and extent of this crime.**

As a digital services provider, Sopra Steria Limited is committed to preventing modern slavery across all our corporate activities including throughout our supply chains.

We respect and uphold human rights across all our operations. We acknowledge modern slavery is a systemic issue present, to some degree, in nearly every supply chain. Our business relies on external suppliers, including professional service providers, who are generally considered to be lower risk. Despite this, we recognise no supply chain is entirely free from risk and that it may exist further down the supply chain particularly among indirect suppliers.

This statement relates to the financial year ending 31st December 2025. It has been prepared in accordance with the United Kingdom (UK) Modern Slavery Act 2015, UK Government Procurement Policy Note 009: Tackling Modern Slavery in Government Supply Chains and the UK Home Office's 2025 Transparency in Supply Chain guidance (TISC) document. It outlines the policies, processes and actions Sopra Steria Limited has undertaken to identify, understand and mitigate the potential risks of modern slavery within our business and supply chain.



## Organisational Structure

At Sopra Steria Limited, we believe the world is how we shape it.

We harness the power of innovation to drive positive change for businesses and society. Through a collaborative approach, we deliver consulting and digital services, creating innovative solutions at scale which enable sustainable growth and improve everyday life.

With 51,000 employees in nearly 30 countries, we deliver services which make a positive difference for our clients, their customers and the wider communities in which we operate. We know our work has a significant impact across the UK. From supporting the delivery of essential government, public and health services, to transforming financial services to provide fairer and more customer centric solutions. We help organisations better serve their customers and communities.

Our anti modern slavery activities detailed in this statement demonstrate how we have integrated the requirements of the UK Modern Slavery Act and TISC guidance into our business practices while also strengthening our commercial capability.

## Our locations

- Austria
- Belgium
- Bulgaria
- Denmark
- France
- Germany
- India
- Italy
- Luxembourg
- Netherlands
- Norway
- Poland
- Spain
- Sweden
- Switzerland
- United Kingdom

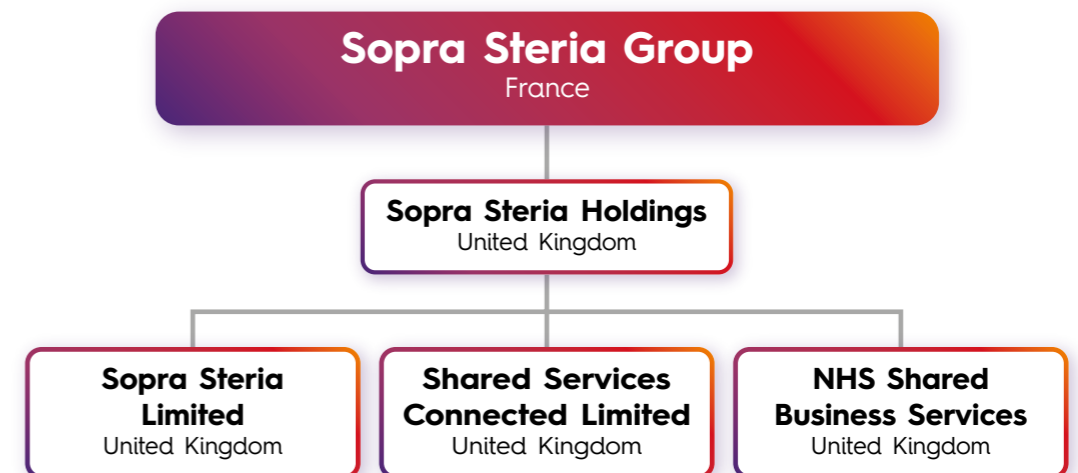


Sopra Steria Limited is proud to be a signatory to the United Nations Global Compact which includes principles addressing Human Rights and Labour. We also align our business with the United Nations Sustainable Development Goals, in particular Goal 8.7 - End modern slavery, trafficking and child labour. Which corresponds with the International Labour Organisation (ILO) framework on modern slavery and human rights.

To ensure our continued alignment with Sopra Steria Limited's values as an ethical and responsible business, we undertake an annual assessment through the international EcoVadis sustainability platform.

The EcoVadis assessment provides an independently verified evaluation of our environmental, social and governance performance as well as a benchmark against our industry peers. In recognition of this commitment, Sopra Steria Limited has been awarded the EcoVadis Platinum rating for the seventh consecutive year. This places us within the top 1% of companies assessed globally across 21 sustainability criteria including our approach to addressing modern slavery risks.

The scope of this statement covers the activities of Sopra Steria Limited headquartered in London, United Kingdom. Sopra Steria Limited forms part of Sopra Steria Holdings which also includes NHS Shared Business Services and Shared Services Connected Limited. Sopra Steria Holdings is a member of the wider Sopra Steria Group, headquartered in Paris, France.



## Supply Chains

Sopra Steria Limited's supply chain primarily comprises of organisations based in the UK and Europe. We recognise parts of our upstream supply chain may extend into countries with a higher risk of modern slavery and/or human trafficking. Our active supply chain consists of approximately 800 suppliers.

We undertake supplier due diligence through the use of questionnaires and an annual supplier engagement survey. These processes enable us to work collaboratively with our suppliers to gather responsible procurement evidence including, where applicable, the supplier's modern slavery statement and details of any anti modern slavery activities they are undertaking. Where a statement is identified as not aligning with UK Home Office guidance, we engage with the supplier and, where appropriate, challenge them to make the necessary improvements.

We expect all suppliers to uphold international labour standards, human rights and to adopt a risk based approach when assessing and managing modern slavery risks within their own operations and supply chains.

## Relevant Policies

The following policies set out measures Sopra Steria Limited has implemented to prevent modern slavery and human trafficking within our own operations and across our supply chain.

All policies are communicated to employees as part of the company's induction programme. Updates to existing policies and the introduction of new policies are made available through our Business Management System, which is accessible to, and actively promoted across, the workforce.

- Code of Ethics**  
 This Code underpins our commitment to transparency, fairness, and loyalty towards our customers, employees, suppliers and wider society. It is aligned with the ten principles of the United Nations Global Compact and includes a clear commitment to combat child labour & exploitation, forced labour and all forms of compulsory labour.
- Responsible Procurement Policy**  
 This policy applies to all procurement activities in the UK and requires adherence to social, ethical, human and labour standards when procuring goods and services. These standards are also embedded within our standard

supplier terms and conditions and our Supplier Code of Conduct. Both require suppliers to uphold human and labour rights as well as to comply with legislation aimed at preventing modern slavery and human trafficking within their own operations and supply chains.

- Sustainability Framework**  
 Sopra Steria Limited believes long-term value comes from seeing success as a part of a bigger picture encompassing people, the economy and the environment. This framework summarises our commitment to sustainability and how we integrate it into our business.
- Sustainability Policy**  
 Sopra Steria Limited's Sustainability Policy, supported by the Sustainability Framework, enables us to contribute to a more sustainable economy and society, foster greater employee engagement and build stronger relationships with our stakeholders. This is achieved by aligning our strategy, objectives, policies and practices with the highest standards of environmental and social sustainability including the promotion of human & labour rights and the prevention of modern slavery.

- Corporate social responsibility policy**  
 Sopra Steria Limited's Corporate social responsibility policy reflects our commitment to shaping a better world through innovation, responsibility and purpose. We focus on driving social value, environmental sustainability and ethical business practices. This policy guides our actions, aligns with our values and ensures we deliver positive impact across society and the environment.
- Recruitment and Selection Policy**  
 We engage only specified and reputable employment agencies to source labour and verify the recruitment practices of any new agency prior to engagement. All candidates are subject to verified right to work checks. In the UK, compliance with the Modern Slavery Act 2015 is included within supplier contracts and reviewed as part of regular supplier meetings.
- Equal Opportunities and Diversity Policy**  
 This policy sets out Sopra Steria Limited's commitment to creating and maintaining a working environment which is free from discrimination and values all employees as individuals.

## Due Diligence

Sopra Steria Limited has a range of policies and processes in place to ensure our employees are not subject to exploitation and that they work in a safe, fair and supportive environment. To support this commitment, we have implemented the following measures.

### Due Diligence: Within our Recruitment process

- Pre employment checks**  
 We undertake robust pre employment checks including verification of identity and confirmation of an employee's ongoing right to work in the UK.
- Retention of identity documents**  
 We do not retain or withhold personal identity documents, such as passports, at any point during an employee's employment with us.
- Contracts of employment**  
 All employees are issued with a contract of employment. Clearly setting out the employee's rights and obligations including the notice period required to terminate the contract.
- Freedom of employment**  
 Employees are free to give notice and leave Sopra Steria Limited at any time in accordance with their contractual terms.

### Due Diligence: Within our Operations

- Working conditions and statutory rights**  
 We comply with, and, in many cases exceed, all relevant legislation relating to working time and statutory leave. This includes holiday entitlement, rest breaks & rest periods, sickness absence, maternity & paternity leave

and time off for personal emergencies. These policies are communicated to all employees as part of the induction process.

- Policy communication**  
 Updates to existing policies, or the introduction of new policies, are communicated to all employees through group wide communications to ensure awareness of their employment rights.
- Freedom of association**  
 We respect the right of all employees to join a trade union. Where employees choose to be represented by a recognised trade union, Sopra Steria Limited is committed to engaging constructively with them to maintain positive and harmonious industrial relations.
- Whistleblowing arrangements**  
 All employees have access to a confidential whistleblowing process updated in late 2025. It enables them to raise concerns including any suspected breaches of human rights or instances of human trafficking. We continue our ongoing efforts to identify potential risks though to date, no cases of modern slavery or human trafficking have been reported within the business.
- Real Living Wage commitment**  
 Sopra Steria Limited has been an accredited real Living Wage employer for the past five years. We voluntarily pay all our employees, as a minimum, the real Living Wage including those employed through our property and facilities service providers. In addition, our Supplier Code of Conduct sets an expectation for suppliers to either pay the real Living Wage or to be working towards achieving real Living Wage accreditation.



### EcoVadis: Platinum

In 2025 Sopra Steria Group achieved Platinum status again. We are now recognised in top 1% of organisations assessed globally, 7th year in a row.



### International Labour Organization

At Sopra Steria Limited, we ask our Suppliers to ensure neither they nor their suppliers engage in child labour and that their employment of young workers complies with ILO standards and applicable local legislation.



### Living Wage Accredited Employer

Sopra Steria Limited have been real Living Wage accredited for the past five years.



### UN Sustainable Development Goals

We are aligned with the United Nations Sustainable Development Goals, in particular Goal 8.7 - End modern slavery, trafficking and child labour.

“Unseen is proud to have partnered with Sopra Steria Limited in the creation of their new mandatory e-learning module. Understanding modern slavery is the first step toward tackling it. By working with anti-slavery experts Unseen, Sopra Steria Limited is demonstrating its commitment to tackling exploitation. Together, we can drive meaningful change and create a future free from modern slavery.”

Annie Evans, Business Engagement Manager, Unseen



### Due Diligence: Within our Supply chain

At Sopra Steria Limited, we recognise the greatest risk of modern slavery and human trafficking exists within our supply chain. As a result, our engagement with suppliers is a critical component of our commitment to prevent modern slavery and to foster a responsible, healthy and diverse supply chain.

We procured in excess of £180 million of goods and services in 2025. Of this spend, approximately 97% is with organisations based in the UK and European Union, 2% with suppliers located in North America and less than 1% with suppliers based in the rest of the world.

### Key Spend Categories

Sopra Steria Limited’s primary spend categories are

- IT services
- Consultancy and contractors
- IT equipment

Sopra Steria Limited recognises IT equipment carries a higher inherent risk of modern slavery due to factors such as country of origin where raw materials are sourced from and the nature of the industry. As a result, this category requires enhanced levels of modern slavery due diligence. We are committed to strengthening our approach in this area and are continuing to address these risks.

### Supplier Engagement

Sopra Steria Limited operates a modern slavery supplier engagement programme. It is designed to identify, assess and mitigate modern slavery and human trafficking risks across our supply chain. Key elements of this programme include:

- **Supplier onboarding and contractual controls**  
All new suppliers are assessed as part of the onboarding process. They are required to accept Sopra Steria Limited’s Supplier Code of Conduct and standard terms and conditions.
- **Supplier Code of Conduct obligations**  
Ensuring neither they nor their suppliers engage in child labour and that their employment of young workers complies with ILO standards and applicable local legislation.

The Supplier Code of Conduct is reviewed annually and on an ad hoc basis when required, to ensure it remains relevant and contains clear and effective obligations for our supply chain partners.

- **Supplier assessment and monitoring**  
We use EcoVadis to assess and monitor key suppliers against 21 environmental, social and ethical criteria. This includes gathering data on labour standards and fair business practices within suppliers’ own operations and across their supply chains. The assessment process enables us to identify potential areas of risk and agree corrective action plans, supporting collaboration, transparency and continuous improvement.
- **Issue escalation and remediation**  
Any suspected incidents of modern slavery within our supply chain will be investigated. Suppliers will be required to implement appropriate remedial actions within an agreed timeframe. Where Sopra Steria Limited are not satisfied with the outcome, we reserve the right to terminate business relationships or contracts with suppliers who fail to address our concerns.
- **Fair and responsible payment practices**  
Sopra Steria Limited is a signatory to the Prompt Payment Code. It promotes best practice in payment standards and helps to reduce the risk associated with late or extended supplier payments. We are in the process of becoming a signatory to the new Fair Payment Code which introduces additional controls to support fair and transparent financial practices within supply chains. Our standard payment terms are net 30 days which help to reduce financial pressure on suppliers that could increase the risk of modern slavery.

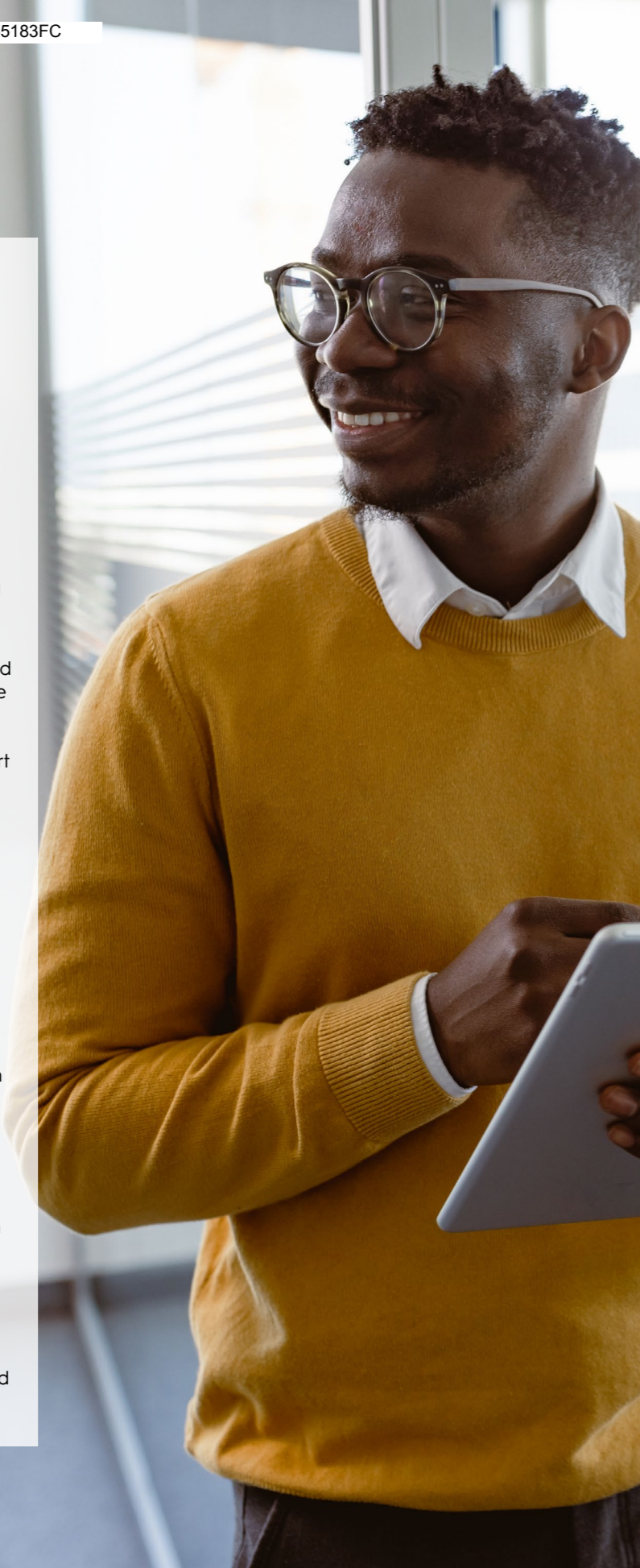
## Training and raising awareness

At Sopra Steria Limited, we recognise the importance of ensuring our employees understand

- The risks associated with modern slavery,
- Are able to recognise potential indicators and
- Know how to report concerns within our operations and supply chain.

To support this, we have implemented the following training and awareness raising activities

- **Mandatory modern slavery training**  
All employees, including contractors, are required to complete a mandatory online training module on modern slavery and human trafficking. It raises awareness of individual rights and provides guidance on how to identify and report on potential signs of modern slavery within our business and supply chain. During 2025, we launched a refreshed e-learning module. This was developed in collaboration with Unseen, a specialist modern slavery charity, to strengthen the quality, relevance and effectiveness of our training. It also enhanced our overall approach to identifying and mitigating modern slavery risks.
- **Role specific training**  
We provide additional enhanced training for employees with roles in Procurement and Facilities Management who engage directly with suppliers delivering services identified as having a higher inherent risk of modern slavery.
- **Bespoke Procurement team training**  
As part of our 2025 supplier engagement programme, 100 members of the wider procurement community across the organisation received responsible procurement training. It included a specific focus on modern slavery.
- **Cross functional awareness sessions**  
We have provided modern slavery awareness training to approximately 100 additional colleagues, helping to embed understanding and accountability across the organisation.



## Activities undertaken this financial year

Sopra Steria Limited continues to publish its Modern Slavery statement on the UK Government's Modern Slavery statement registry, demonstrating transparency and accountability in accordance with the Modern Slavery Act 2015. Our 2024/2025 statement met all UK Government's recommended reporting criteria. It evidenced measurable year on year continual improvement and increased maturity in our approach compared with previous years.

Sopra Steria Limited also completed the UK Government's Modern Slavery Assessment Tool survey (MSAT), achieving an overall score of 93%. This assessment supports our ongoing evaluation of the effectiveness of our policies, controls and risk management processes. It also informs our continuous improvement activities.



## Dedicated in house expertise

Sopra Steria Limited has dedicated internal expertise to oversee and strengthen our approach to modern slavery risk management. Our Sustainable Procurement Manager

- Leads on sustainable/responsible procurement and modern slavery risk management activities which strengthen due diligence and risk based controls across our supply chain.
- Represents Sopra Steria Limited on the Business Services Association's (BSA) Modern Slavery Council, supporting cross sector collaboration and knowledge share.
- Is a member of tech:UK's Responsible Business Conduct Group. Through this, they have contributed to the UK Government's Joint Committee on Human Rights inquiry into forced labour in supply chains, supporting wider policy development and best practice guidance.
- Provides proactive modern slavery risk assessment and due diligence support on client accounts, tenders and RFIs.

All of this collectively enhances Sopra Steria Limited's ability to identify, prevent and respond to potential modern slavery and human trafficking risk effectively.



## Procurement Lifecycle

At Sopra Steria Limited, we ensure modern slavery risks are considered during each stage of the procurement life cycle. This includes tender evaluation, contract award and in-life contract management.

During 2025, we introduced into our standard tender process, steps requiring prospective suppliers to declare activities they are taking to mitigate the risk of modern slavery within their operations and supply chains.

By doing this proactively, we have been able to strengthen our supplier relationships and ensure the successful bidder is always aligned with our commitment to addressing modern slavery risks.



## Responsibility

Individuals and departments accountable for policies.

| Title of Individual          | Department                             | Responsibility  |
|------------------------------|--|---|
| Chairman                     | Sopra Steria Group SA (France)         | Sopra Steria Group Code of Ethics.  |
| Director of People & Culture | People & Culture, Sopra Steria Limited | Policies related to the prevention of modern slavery and human trafficking in our own operations. |
| Procurement Director         | Procurement, Sopra Steria Limited      | Policies related to the prevention of modern slavery and human trafficking in our supply chain.   |

## Leadership and Governance

Within Sopra Steria Limited's own operations, the People & Culture Team are responsible for making sure due diligence checks are undertaken during all stages of employment from initial recruitment onwards, as referenced above.

Within our procurement and supply chain management activities, our procurement team are responsible for undertaking due diligence and activities related to the prevention of modern slavery and human trafficking. They incorporate input from other parts of the business including Legal, People & Culture and Environment & Sustainability to do this.

## Key Performance Indicators

The following key performance indicators (KPIs) are in place. They are reviewed annually.

| KPI Categories          | KPI 2025   |
|-------------------------|--|
| Supplier Engagement     | 100% of our suppliers to have agreed to our Supplier Code of Conduct.  |
|                         | 100% of annually targeted suppliers to have completed the EcoVadis sustainability assessment.  |
| Modern Slavery Training | 100% of all existing employees, new employees and contractors to complete mandatory modern slavery training every two years.                                 |
|                         | 100% of employees who have roles dealing with suppliers, such as the Procurement Team, to receive ongoing updates regarding human rights and modern slavery. |

## Board Approval

Sopra Steria Limited's Board of Directors has approved this statement for the financial year ending on 31st December 2025.

Director's signature: 

22-May-26

Director's name: John Neilson

Date

## About Sopra Steria

Sopra Steria, a major Tech player in Europe with 51,000 employees in nearly 30 countries, is recognised for its consulting, digital services and solutions. It helps its clients drive their digital transformation and obtain tangible and sustainable benefits. The Group provides end-to-end solutions to make large companies and organisations more competitive by combining in-depth knowledge of a wide range of business sectors and innovative technologies with a collaborative approach. Sopra Steria places people at the heart of everything it does and is committed to putting digital to work for its clients in order to build a positive future for all. In 2025, the Group generated revenues of €5.6 billion.

The world is how we shape it.

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

For more information, please visit our website [www.soprasteria.co.uk](http://www.soprasteria.co.uk)