

Modern Slavery Statement 2023

This Modern Slavery Statement 2023 (“Statement”) is published in accordance with the Modern Slavery Act 2015 (“Act”) and covers the period from January 1, 2023, to December 31, 2023. It outlines the measures taken by Itransition Group Limited and its affiliates (Itransition, the “Company”, “we”, “us”, and “our”) during the 2023 financial year to prevent slavery and human trafficking within our supply chains and across all aspects of our business. While not all our affiliates are subject to the Act, we have prepared this Statement on a consolidated basis due to shared approaches and policies regarding modern slavery across our business.

About Us

Itransition is a global software engineering company and a leading provider of digital solutions and consulting services with a worldwide delivery infrastructure. Our projects span across forty countries and counting, and our offices in the United Kingdom, North America, Europe and Asia house over three thousand professionals specializing in various domains, dedicated to delivering business value through technology.

We uphold a zero-tolerance policy towards slavery and human trafficking in our supply chains. We do not tolerate child labor, forced labor or any form of slavery or servitude. Itransition adheres to fair recruitment and employment practices and ensures fair compensation.

Given the professional nature of our business, we perceive a low risk of involvement in slavery or human trafficking activities. We have not been aware of any instances that could be deemed violations of human rights. Nevertheless, we recognize the importance of vigilance and transparency, conducting rigorous risk assessments and due diligence to uphold the Act’s requirements.

We continually enhance our internal procedures and awareness efforts to prevent any potential instances of slavery and human trafficking within our operations and supply chains.

This Statement affirms Itransition’s stance that our employees, customers, contractors, and suppliers must refrain from engaging in any business practices constituting human trafficking or slavery.

We expect all business partners to uphold ethical standards consistent with our approach and comply with relevant legislation and industry norms.

Actions Taken in 2023

ltransition complies with all applicable legislation and industry standards concerning slavery and human trafficking, including the Modern Slavery Act.

To identify risks in our business operations and supply chains, we have undertaken the following actions:

Policies and Standards

We have followed local policies to assess and prevent the risk of modern slavery and human trafficking. These include our Anti-Bribery Policy, Sanctions Compliance Policy and Risk Management Policies. Through these policies, we communicate our values and expectations, setting high standards for ourselves and our partners while clearly denouncing slavery and human trafficking. Our policies undergo regular review to align with accepted industry practices and standards.

Last year we approved a set of new policies, including the Code of Conduct for our service providers, and updated our Modern Slavery compliance policy and employee Code of Conduct. And in 2023 we have implemented them in practice. We are distributing these policies and requirements across our companies, including to new offices and their employees.

Employee Practices

We provide clear and transparent terms of employment through detailed employment contracts that comply with local labor laws. Candidates receive these contracts in advance, enabling them to review the terms and conditions of employment offered by ltransition. Employees have the right to terminate their employment voluntarily without penalty, subject to the notice period required under local laws.

We are diligent in verifying the eligibility of candidates for employment and ensure compliance with local regulations regarding the right to work. Child labor is strictly prohibited.

Our recruitment practices are continuously refined to improve transparency and fairness, ensuring a positive experience for candidates and employees alike.

Due Diligence and Risk Assessment

We assess the reputation, performance, and sustainability of our suppliers and customers using various indicators, including financial and business criteria. Before and during our engagements, we conduct comprehensive evaluations and meetings to mitigate risks and ensure compliance with laws, regulations, and our internal policies.

We are enhancing our due diligence procedures, requesting additional information and conducting more thorough evaluations where concerns arise. We focus on sanctions and anti-money laundering matters.

Communication and Training

Itransition recognizes the need to enhance the employees' understanding of modern slavery and human trafficking risks. We conduct training sessions to raise awareness and educate our personnel on identifying and mitigating these risks effectively. Our legal and compliance team provides ongoing support and is available for our employees to address any concerns or questions they may have.

Reporting Issues

Employees can report concerns related to activities or supply chains posing risks of slavery and human trafficking through our local reporting mechanisms. All disclosures are handled confidentially.

Future Plans

Our objectives for the current year include:

Deepening our expertise in combating modern slavery and human trafficking;

Enhancing visibility across our supply chains;

Providing training for directors and employees;

Assessing existing and new business partners;

Including references to comply with our Code of Conduct for service providers in relevant agreements;

Continuously evaluating the effectiveness of our procedures and developing best practices through workshops and internal reviews.

During the 2023 financial year, there were no reported instances of slavery or human trafficking. We remain committed to refining our compliance program continually.

This Modern Slavery Statement has been approved by the Board of Directors of Itransition Group Limited and encompasses all activities conducted by the Company.

Mikalai Hanusevich

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Director

Date: 27 June 2024