

## **Modern Slavery Statement 2024**

This Modern Slavery Statement (the “Statement”) is made and published in accordance with the Modern Slavery Act 2015 (the “Act”) and covers the period from 01 January 2024 to 31 December 2024. It outlines the measures taken by Itransition Group Limited and its affiliates (Itransition, the “Company”, “we”, “us”, and “our”) 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 over forty countries, and our offices in the United Kingdom, North America, Europe and Asia are home to more than three thousand professionals. These experts, specialising in various domains, are 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 labour, forced labour 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 consider the risk of involvement in modern slavery or human trafficking to be low. Itransition is a technology services company. We do not manufacture goods, operate in high-risk sectors (i.e., industries where working conditions are harder to monitor and where labour exploitation is more likely) or rely on low-skilled or seasonal labour. These factors are typically associated with a higher risk of modern slavery and human trafficking.

We have not identified any instances that could be deemed violations of human rights within our operations or supply chains. Nevertheless, we remain fully aware of the importance of vigilance and transparency. We continue to conduct risk assessments and apply robust due diligence procedures to ensure ongoing compliance with the Act and to uphold our ethical responsibilities.

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 personnel, 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 2024**

At Itransition, we follow all applicable laws and guidelines related to modern slavery and human trafficking. We are committed to high ethical standards in every part of our business and supply chain.

As a technology company, we believe the risk of modern slavery in our operations is low. Nevertheless, we take our responsibilities seriously and stay alert to any potential risks. To identify these risks we have undertaken the following actions.

#### *Policies and Standards*

We operate internal policies that mitigate the risk of modern slavery and set forth the measures to be taken to prevent slavery in our business. These, including our Codes of Conduct, Modern Slavery Compliance, Recruitment, Whistleblowing and Risk Management policies, are regularly reviewed and updated in line with best practice to ensure their continued effectiveness. Through these policies, we communicate our values and expectations, setting high standards for ourselves and our partners while clearly denouncing slavery and human trafficking.

#### *Anti-Slavery Policy*

This policy reflects our commitment to acting ethically and with integrity in all our business relationships. It outlines our position on modern slavery and provides guidance for personnel on how to recognise potential cases and where to seek support.

#### *Recruitment Policy*

We follow a robust recruitment process, including checks to confirm all personnel are legally eligible to work in the United Kingdom and other location Itransition has presence. This helps protect against the risk of human trafficking or forced labour.

#### *Whistleblowing Policy*

Our whistleblowing policy ensures that all personnel can raise concerns about unethical treatment of individuals or questionable practices within our business or supply chain, without fear of retaliation.

Moreover, in 2024, we updated our global policies such as Anti-Bribery and Sanctions Compliance to reflect current best practices and strengthen our controls.

#### **Employment Practices**

We provide clear and transparent terms of employment through detailed employment contracts that comply with local labour laws. Candidates receive these contracts in advance, enabling them to review the terms and conditions of employment offered by Itransition. Personnel has 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 labour is strictly prohibited.

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

### **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.

### **Awareness and Training**

We know that awareness is key to preventing modern slavery.

It transition recognises the need to enhance the personnels' 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 personnel to address any concerns or questions they may have.

### **Our performance indicators**

We assess the effectiveness of our efforts to prevent slavery and human trafficking within our business and supply chains by monitoring whether there are any reports or signs of these issues.

If we do not receive any reports from personnel, relevant authorities, the public, or law enforcement indicating the presence of modern slavery, we will consider our current measures to be effective.

### **Reporting issues**

Personnel can report concerns related to activities or supply chains posing risks of slavery and human trafficking through our internal reporting mechanism. All disclosures will be handled confidentially.

During the 2024 financial year, there were no reported instances of slavery or human trafficking. We remain committed to refining our compliance program continually.

### **Future plans**

Itransition has not experienced any instances of modern slavery within its operations. We remain committed to monitoring the effectiveness of our actions and related policies to ensure appropriate measures are in place to prevent modern slavery in our business. These efforts may include:

further strengthening our expertise in combating modern slavery and human trafficking;

increasing transparency and visibility across our supply chains;

conducting thorough assessments of both existing and potential business partners;

delivering targeted training to directors and personnel on the risks and signs of modern slavery;

ensuring that relevant agreements we enter include clauses requiring compliance with the provisions of the Modern Slavery Act 2015;

continuously reviewing the effectiveness of our procedures and policies in line with best practices.

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 in respect of financial year ended 31 December 2024 and has been approved by the Board of Directors of Itransition Group Limited, who will review it annually.

Signature *Mikalai Hanusevich*

Director Mikalai Hanusevich

Date: 20 May 2025