

Modern Slavery Statement 2025

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 1st January 2025 to 31st December 2025. 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 internal 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 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 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, primarily operate in sectors traditionally associated with elevated modern slavery risks, such as extractive industries or labour-intensive manufacturing 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.

Our Commitment

This Statement affirms Itransition’s position 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.

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.

Actions taken in 2025

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. During the reporting period, we reviewed our approach to modern slavery risk management against the latest statutory guidance issued by the UK Home Office under the Modern Slavery Act 2015, to ensure alignment with regulatory expectations and evolving best practices.

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.

Our approach to preventing modern slavery and human trafficking also forms part of our broader environmental, social and governance (ESG) framework, through which we seek to promote responsible business conduct, ethical supply chains and respect for human rights.

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 and with reference to applicable regulatory guidance 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.

Where appropriate and permitted by applicable law, our recruitment process also includes identity and background verification checks to support ethical hiring practices and mitigate the risk of forced or trafficked labour.

Our recruitment practices are continually reviewed and refined to improve transparency and fairness and to support a positive candidate experience.

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.

These policies are available on request at legal@itransition.com.

Employment Practices

We provide clear and transparent terms of employment through detailed employment contracts that comply with local labor laws. Candidates and/or employees receive these contracts and handbook, where applicable, in advance, allowing them to review the terms and conditions of employment offered by Itransition. Personnel have the right to terminate their employment voluntarily without penalty, subject to the notice period required under local laws.

We are diligent in ensuring that all employees comply with local regulations regarding the right to work. After hiring, we continuously monitor the validity of all necessary documents and work authorizations, including residence permits, permanent residency, or other required approvals.

Child labor is strictly prohibited.

Due Diligence and Risk Assessment

We assess the reputation, performance, and sustainability of our suppliers and customers using various indicators. Before and during our engagements, we conduct comprehensive evaluations and meetings to mitigate risks and ensure compliance with laws, regulations, and our internal policies. Our supplier risk assessment methods may include, where appropriate, a review of suppliers' internal policies and procedures, verification of relevant certifications, adverse media checks, and consideration of the geographic location of operational or production facilities.

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, while also considering indicators that may suggest elevated modern slavery or human trafficking risks, particularly in higher-risk jurisdictions or supply chain segments.

Awareness and Training

We know that awareness is key to preventing modern slavery.

Itransition 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. Such activities may include internal communications, guidance materials and targeted sessions.

Our legal and compliance team provides ongoing support and is available to address any concerns or questions they may have.

In addition, we have an anonymous channel to raise concerns.

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 or suppliers, the public, or law enforcement suggesting the presence of modern slavery, we will consider our current measures to be effective, while continuing to assess whether further enhancements or controls may be appropriate.

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 reporting period, there were no reported instances of slavery or human trafficking. We remain committed to refining our compliance program continually.

Future plans

Ittransition 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:

aligning with statutory guidance and recognised industry standards;

increasing transparency and visibility across our supply chains as part of our broader ESG objectives;

strengthening our expertise in combating modern slavery and human trafficking;

conducting thorough assessments of both existing and potential business partners;

providing targeted training to personnel on the risks and indicators of modern slavery;

continuously reviewing and improving the effectiveness of our procedures and policies on an ongoing basis.

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 in respect of financial year ended 31 December 2025 and has been approved by the Board of Directors of Itransition Group Limited, who will review it annually.

Mikołaj Ganusiewicz

A handwritten signature in black ink, appearing to read 'Mikalai Hanusevich', written in a cursive style.

Director

Date: 11th March 2026