



## **Policy Against Human Trafficking and Slavery (Modern Slavery Policy)**

The SoftServe has a zero-tolerance approach to modern slavery.

We recognize that slavery and human trafficking is a real, yet hidden issue in our society. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

SoftServe will not tolerate or condone any form or practice that constitutes human trafficking or slavery in any part of our global organization inclusive of recruitment agencies, customers, partners, and vendors. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective controls to ensure that any form of slavery is not taking place in our business. We expect the same high standards of our customers and partners.

SoftServe will promptly and thoroughly investigate any claim or indication that a customer, partner, or vendor is engaging in human trafficking or slave labor. SoftServe is committed to ensuring there is transparency in our own business and in our approach to external relationships

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following workplace policies and procedures which can be found on Confluence and accessed via Corporate Dashboards in Workday:

SoftServe Code of Conduct

Whistle Blower Policy

Equal Opportunity

### **SCOPE/TO WHOM THIS POLICY APPLIES**

This policy applies to all persons working for the SoftServe or on our behalf in any capacity, including associates at all levels, directors, officers, agency workers, associates on assignment workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment and SoftServe may amend it at any time.

### **COMPLIANCE WITH THIS POLICY**

- You are encouraged to familiarize yourself with the above noted policies. If you have any queries about this policy or have knowledge of activities that are in violation of it, please contact your local HRBP. Local HRBP name is found in the support roles in your Workday profile.
- You must notify your manager OR HR Business Partner as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future in accordance with our Whistleblower policy

- You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business the responsibility of all those working for and with us.
- You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business including customers, vendors and partners at the earliest possible stage.

## **Related Policies**

- Recruitment – we operate a robust recruitment policy, including conducting equal opportunity statements applicable to all countries wherein we staff SoftServe associates
- Whistleblowing – our whistleblowing policy ensures that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business, customers or vendors without fear of reprisal.
- Health and Safety – this policy sets out our approach to ensure we provide a healthy working environment for our staff and contractors that work out of our premises.
- Data Privacy/Protection – this sets out the standards by which SoftServe Protects our associates', customers' and our partners' data
- Corporate Code of Conduct – sets expectations and standards for professionalism throughout the SoftServe Global Workforce

## **Mitigating Risk**

We intend to take the following further steps to combat slavery and human trafficking:

- Assess all new customers and vendors using the Global Slavery Index and ask them to certify that they have taken steps to eradicate modern slavery within their own organization and supply chain
- Incorporate anti-slavery and human trafficking obligations into agreements and subcontracting arrangements on a risk assessed basis
- Incorporate training for associates at all levels to ensure a high level understanding of the risks of modern slavery and human trafficking; and
- Where appropriate (US) we will include reference to the Modern Slavery Act 2015 in our policies and procedures

## **BREACHES OF THIS POLICY**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

SoftServe may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy