

Modern Slavery Act Statement

Organisation

Sopra Banking Software Limited provides banking software and IT services to financial services organisations in the UK and throughout Europe, and employs around 250 people across 4 main locations in the UK. Sopra Banking Software is a subsidiary of Sopra Steria Group, a European leader in digital transformation with its headquarters in Paris, France. Offshore services are also provided to Sopra Banking Software Limited from Noida, India, by Sopra India Private Limited, which is also a wholly owned subsidiary of Sopra Steria Group.

Responsibility for the organisation's anti-slavery approach and procedures lies with its directors. Responsibility for overall supply chain management is spread across the Group purchasing functions, the Strategic Alliances Manager and the directors of subsidiary companies. For UK specific matters, the head of Human Resources is responsible for HR policies and training, and the head of Industrial Direction is responsible for local supply chain management.

Policies

- **Code of Ethics** – by committing Sopra Steria Group to the 10 principles of the UN Global Compact, the Code of Ethics exhibits Sopra Steria Group's approach of prioritising ethical, environmental and social values, including an explicit commitment to fight against any form of compulsory labour. The Code of ethics is supported by Sopra Steria Group management and applies to all subsidiaries and employees of Sopra Steria Group.
- **Responsible Purchasing Policy** – the same 10 principles of the UN Global Compact are enshrined in Sopra Steria Group's Responsible Purchasing policy, which supports the inclusion of a Responsible Purchasing Charter in supplier contracts.
- **Sopra Banking Software Partners & Suppliers Directory** – our Partners & Suppliers directory is currently being updated to support a procurement approach in which checking our suppliers' commitment to combating modern slavery and people trafficking is integral, including the use of the Responsible Purchasing Charter.
- **Sopra Banking Software UK Supplier Management Policy** – Our supplier management policy is currently being updated to support a procurement approach in which checking our key suppliers' commitment to combating modern slavery and people trafficking is integral, including the use of the Responsible Purchasing Charter.
- **HR policies** – ethical standards towards all Sopra Banking Software Limited employees are set out in our HR policies including the due diligence processes outlined below.

Due Diligence Processes

Sopra Banking Software Limited's compliance with relevant employment legislation ensures that:

- Our employees are not being exploited, are safe at work and that relevant health and safety and human rights laws are adhered to, including freedom of movement and communications;
- Our contracts of employment and our Leaving Employment policy allow employees to serve notice of termination of their employment at any time;
- Our pre-employment screening process ensures that all candidates have a right to work in the UK and we would not seek to withhold any individual's identity documents;
- All employees are paid at least national minimum wage and we adhere to all relevant legislation in respect to working time, time off, minimum amounts of holiday, time off for personal emergencies or sickness and maternity/paternity leave.

In respect to supply chain management:

- The Sopra Steria Corporate Responsibility Report (2016) shows that in 2016, Sopra Steria Group put in place a process of having its key suppliers assessed by a third party, EcoVadis, which specialises in carrying out CSR assessments of companies. This assessment takes into account and anticipates local regulatory requirements including the duty of care for parent companies in France and the Modern Slavery Act in the United Kingdom. Assessment of suppliers by EcoVadis has been put in place at Group (HQ) level as well as in France, the United Kingdom, Belgium, Luxembourg, Poland and Spain.
- From 2017, suppliers identified as key suppliers or strategic suppliers for Sopra Banking Software Limited should be evaluated based on their ability to sign up to the Responsible Purchasing Charter and/or the publishing of a Modern Slavery Act statement.

Risk Management

Within the UK and Europe, Sopra Banking Software Limited would not deem its provision of IT services to financial services companies as a service at high risk of being connected with activities more commonly associated with modern slavery and people trafficking, due to our services being provided by a highly skilled workforce. Apprentices undergoing apprenticeship schemes will be protected by our compliance with relevant legislation and regulations. However any concerns of managers or employees in respect to modern slavery, people trafficking or compulsory labour can be reported and escalated confidentially with surety their concerns will be protected, under our Whistleblowing policy.

Indian Companies are prohibited from employing any bonded or child labour. The Constitution of India guarantees the right to life and liberty and prohibits the practice of debt bondage and other forms of slavery both modern and ancient. Human trafficking in any form is prohibited and any contravention of this provision is an offence punishable in accordance with the law. All Sopra India Private Limited employees are paid at least the minimum wage as prescribed and amended by the local legislation from time-to-time. Sopra India Private Limited complies with all the applicable local labour laws.



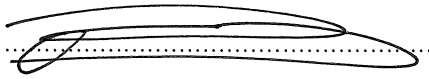
Performance indicators

From 2017 onwards, the number of key suppliers and strategic suppliers signing up to the Responsible Purchasing Charter and/or that a supplier has published a Modern Slavery Act statement can be measured against the total number of key suppliers and strategic suppliers. Internal training requirements (below) should be verified annually.

Training

The board of directors and the senior executive management staff of Sopra Banking Software Limited have been briefed on the importance and practical considerations of the Modern Slavery Act and are committed to upholding the values described in this statement. This statement and other relevant information will be made available to all employees upon publication and on an ongoing basis including through the new starters process as governed by the Starters Transfers Leavers Policy. Individuals responsible for supplier management including the head of Industrial Direction and the Strategic Alliances Manager will be briefed in respect to good practice in assessing suppliers.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Sopra Banking Software Limited's slavery and human trafficking statement and commitment for the financial year ending 31 December 2016.



Eric Pasquier

CEO

18th July 2017

