
Modern Slavery Act Statement

Introduction

This statement sets out the actions that Sopra Banking Software Limited ("SBS UK") has taken to understand the potential risks to its business from modern slavery and to ensure that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to the financial year ending 31st December 2019.

SBS UK is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement has not been published within the usual timeframe owing to reduced capacity during the coronavirus pandemic. SBS UK recognizes that it has a responsibility to take a robust approach to preventing slavery and human trafficking at all times and has continued its activity to identify and address the risks of modern slavery in its operations and supply chains throughout the coronavirus pandemic.

Organisational structure, business and supply chains

SBS UK is a wholly-owned UK subsidiary of Sopra Steria Group ("Sopra Steria"). Together with some other subsidiaries, SBS UK forms part of Sopra Steria's Sopra Banking Software division ("Sopra Banking Software"). Sopra Steria is headquartered in Paris, France, and its shares are listed for trading on Euronext Paris. A simplified group structure is published in Sopra Steria's 2019 Universal Registration Document.

SBS UK 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 designs technology solutions for financial institutions in more than 80 countries worldwide.

Sopra Steria is a European leader in digital transformation, providing one of the most comprehensive portfolios of end-to-end service offerings in the market: Consulting, Systems Integration, Software Development and Business Process Services. With 45,000+ professionals in 25 countries Sopra Steria is trusted by leading private and public organisations to deliver successful transformation programmes that address their most complex and critical business challenges.

SBS UK's supply chains primarily comprise suppliers within the UK or Europe. SBS UK avoids contracting with suppliers or sub-contractors located in areas where there is a higher risk of slavery and human trafficking than there is in the UK or Europe. However, we recognize that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking, and we expect our suppliers to prevent and avoid slavery and human trafficking in their supply chains in higher risk countries. We also recognize that slavery and human trafficking does occur in the UK and Europe.

Services are also provided to SBS UK from other Sopra Steria entities, including Sopra Banking Software Solutions India Private Limited ("SBS India"). SBS India is a wholly owned subsidiary of Sopra Steria and is subject to and complies with relevant group policies, further details of which are provided below. The services provided by SBS India primarily relate to research and development and professional services.

Policies and procedures

The policies and procedures of SBS UK and Sopra Steria which to prevent slavery and human trafficking in their operations and supply chain include the following:

- **Code of Ethics** – Sopra Steria has signed the United Nations Global Compact, Advanced Level. The Code of Ethics describes Sopra Steria’s commitment to the 10 principles of the UN Global Compact pertaining to human rights, international labour standard, environmental protection and tackling corruption. The Code of Ethics applies to all Sopra Steria entities and employees.
- **Group Purchasing Procedure** – The Group Purchasing Procedure refers to the same 10 principles of the UN Global Compact and requires that suppliers also commit to them. The Purchasing Procedure applies to all Sopra Steria entities and the rules and principles set forth in it apply to all Sopra Steria employees and purchases.
- **Supplier Code of Conduct** – The code of conduct states that it should be applied to all contractual relationships between Sopra Steria entities and their suppliers. The code of conduct includes detailed supplier commitments with regard to: adherence to all internationally recognised legislation, regulations and standards on human rights and fundamental freedoms; diversity, equal opportunities and respect for people; prohibition of forced labour; respect for working conditions.
- **Sopra Banking Software Partnerships Directory** – The Sopra Banking Software Partnerships Directory has been 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 Supplier Code of Conduct.
- **Sopra Banking Software UK Supplier Management Policy** – SBS UK’s supplier management policy has been 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 Supplier Code of Conduct.
- **HR policies** – Ethical standards are set out in SBS UK’s HR policies including the due diligence processes outlined below. SBS UK’s Whistle Blowing Policy, Starters Transfers and Leavers Policy and Recruitment Policy have been reviewed and updated to ensure compliance with the Modern Slavery Act 2015.

Due Diligence Processes

SBS UK’s compliance with relevant employment legislation promotes human rights, largely prevents modern slavery and 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; and
- Our contracts of employment and our Leaving Employment policy allow employees to serve notice of termination of their employment at any time.

SBS UK’s 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 SBS UK 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.

Responsibility for overall supply chain management is spread across the Sopra Steria's group purchasing functions, the Strategic Alliances Manager and the directors of subsidiary companies. In respect to Sopra Steria group supply chain management:

- Sopra Steria is a GC Advanced signatory of the United Nations Global Compact, the highest level. The Group ranks among the top 9% of companies supporting the Global Compact;
- In January 2019, Sopra Steria was awarded EcoVadis Advanced Gold level, a global Corporate Social Responsibility evaluation platform, which covers 21 social, ethical, environmental and supply-chain related criteria;
- Sopra Steria's annual financial report for 2019 was published in H1 2020, containing details of Sopra Steria's advancements in corporate social responsibility.

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. In respect to local supply chain management, the ability of suppliers to sign up to the Supplier Code of Conduct and publish their own Modern Slavery Act statement is an evaluation criteria used for identifying key suppliers or strategic suppliers, as set out in the Sopra Banking Software UK Supplier Management Policy and the Sopra Banking Software Partnerships Directory.

Risk Management

SBS UK does not consider 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 of IT professionals. 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. Any person raising such concerns will be protected under our Whistleblowing Policy.

Performance indicators

The performance indicators used to measure effectiveness of SBS UK's measures to combat modern slavery have been established as follows:

- For key and strategic suppliers, the number of key and strategic suppliers who have either published their own modern slavery act statement on their website or signed the Supplier Code of Conduct;
- For internal training, the number of new employees who have been directed to relevant Human Resources policies during induction.

Sopra Banking Software Limited's target for 2020 is to achieve as close as possible to 100% for both performance indicators.

Training

The board of directors and the senior executive management staff of SBS UK 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.

Declaration

This statement has been approved by the board of directors of SBS UK, is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes SBS UK's slavery and human trafficking statement for the financial year ending 31 December 2019.



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Eric Pasquier

CEO