



# SoftwareOne

## Global Modern Slavery Statement 2026

Document title:

Global Modern Slavery Statement 2026

Last Updated Date: May 2026

Next Update: May 2027

## Introduction

SoftwareOne is committed to upholding human rights and ethical business practices by preventing modern slavery and human trafficking within our operations and working to eradicate them from our global supply chains. This Modern Slavery Statement outlines our ongoing efforts to combat modern slavery and aligns with the values and commitments expressed in our publicly available [Codes of Conduct](#).

This statement covers the financial year 1 January 2025 to 31 December 2025 and reflects activities undertaken during that period, with certain improvements and updates implemented up to the publication date. Where relevant, our approach is aligned with the reporting period and group scope used in the sustainability disclosures of our [Annual Report 2025](#), including integration considerations following the completion of the Crayon combination in July 2025.

## Our Company

As a leading global provider of software and cloud solutions, SoftwareOne recognizes the responsibility we bear in advancing human rights and ethical standards across our business operations.

## Commitment to Human Rights and Global Frameworks

SoftwareOne is committed to upholding human rights, as outlined in the UN Universal Declaration of Human Rights and other internationally recognized frameworks, including the [UN Guiding Principles on Business and Human Rights](#).

SoftwareOne continues to integrate modern slavery and human rights considerations into its broader ESG framework. More information on our processes and quantitative data on this topic, such as any incidents, is included in our [Annual report](#), in line with the EU Corporate Sustainability Reporting Directive.

SoftwareOne has implemented measures such as training and communication on our Code of Conduct, which is underpinned by a zero-tolerance approach to modern slavery, a Partner Code of Conduct, due diligence assessments on suppliers, and regular employee training programmes on this topic.

Our focus has been to ensure that we create the most ethical working environment for our employees, partners and clients. Given the nature of our business, our goals and policies on human rights have been focused on the impact we have on our supply chain.

At SoftwareOne, our human rights focus in the context of this statement is on modern slavery and human trafficking risks in our supply chain. Given the nature of our business, as a provider of software and cloud solutions, we consider that certain human rights topics such as those typically associated with manufacturing activities, for example in the sourcing of industrial water, present a comparatively low inherent risk for our business model. Notwithstanding, we continuously review and reassess our human rights risks as our business and regulatory expectations evolve.

To reinforce efforts in improving our risk-based scoping, we screen our software and cloud partners against [UN Global Compact Industry Specific Risk Factors, whilst bearing in mind](#) the nature of the products and services they provide. This helps us prioritise enhanced due diligence and supplier

engagement where most needed. These screening activities are designed to identify and triage potential risk signals; they do not provide a guarantee that modern slavery is absent in our operations or supply chain, but we are continuously strengthening our visibility and controls over time.

## Our Supply Chain

We acknowledge the risks associated with modern slavery in complex global supply chains. SoftwareOne implements stringent processes to evaluate, monitor, and manage suppliers' adherence to our ethical standards. Our due diligence assessments ensure suppliers align with our values and comply with anti-slavery and human trafficking laws.

To uphold this commitment, we have the Integrity Line, a dedicated reporting channel, designed for anyone associated with SoftwareOne to report discrepancies or concerns. The Integrity Line is available to the public and is equally available to all employees at [Software One | Home \(integrityline.io\)](https://www.softwareone.com/integrityline)

The Integrity Line offers a secure, confidential, and anonymous platform to report misconduct, ethical violations, or behaviours that contravene our company values, including concerns on our Supply Chain.

In addition to our Integrity Line, SoftwareOne offers external reporting telephone hotlines dedicated to external stakeholders.

These hotlines offer multi-language support, are operational 24/7 and are provided at no cost for calls made within the country. For more information, please visit our [website](#).

## Third-Party Risk Management Programme

SoftwareOne has a Third-Party Risk Management Programme designed to identify and mitigate risks within our supply chain, including modern slavery, via the **IntegrityNext** portal. This process identifies suppliers that pose the highest risk based on factors such as location and industry. A questionnaire evaluates the supplier's compliance with various standards, including Data Protection, ESG, Risk, Compliance, Procurement, and Data Security. The questionnaire provides a comprehensive assessment of the supplier's practices, policies, controls, allowing for a consistent and objective evaluation of supplier risk. This programme encompasses:

- **Risk Assessment:** Regular assessments identify vulnerabilities, enabling prioritized actions to mitigate risks effectively.
- **Partner Code of Conduct:** Our Partner Code explicitly prohibits forced labour, child labour, and any form of modern slavery.
- **Due Diligence:** We conduct due diligence on potential suppliers to evaluate their commitment to human rights and ethical practices.
- In 2025, we continued to enhance our third-party due diligence process with **IntegrityNext**. We expanded our supplier coverage, onboarding our A, B and C category suppliers (some new and some current). Between 2023 and 2025, we have monitored 12,418 suppliers and 3,991 have been invited to our assessment process, with an overall completion rate of 65%.
- In line with German Supply Chain Law all 5,250 of our German suppliers were uploaded to the IntegrityNext portal and underwent a risk analysis based on country and industry risks.

During 2025, we identified and reviewed 639 A,B and C suppliers with an ESG lens and invited 613 suppliers to our due diligence assessment via Integrity Next.

## Continuous Improvement and Training Commitment

SoftwareOne is committed to continuous improvement in our approach to combating modern slavery. To support this:

- We regularly review and update our procedures to align with evolving regulations and best practices.
- Ongoing training and educational resources are provided to relevant personnel to raise awareness of modern slavery risks and ensure effective risk mitigation strategies are in place.
- Topics related to modern slavery are addressed in our [Codes of Conduct](#), to ensure that employees, partners, and our supply chain uphold the highest ethical standards and are protected from any forms of injustice.
- In 2025, we continued building on the company-wide approach to compliance awareness introduced in 2024, offering training during the Compliance, Data and Security Month. This mandatory training campaign for all employees includes the rollout of the Code of Conduct Refresher and related compliance courses and achieves a completion rate of over 90%. In addition, targeted ad hoc training sessions were delivered to employees in higher-risk roles to further strengthen their ability to identify and address potential modern slavery risks within their areas of responsibility.

## Conclusion

SoftwareOne remains resolute in the commitment to combat modern slavery and human trafficking. We will persistently collaborate with our employees, suppliers, and stakeholders to uphold human rights and ethical standards across our global operations and supply chain.

Signed on behalf of SoftwareOne:

Raphael Erb and Melissa Mulholland

Co-CEOs, SoftwareOne

Handwritten signatures of Raphael Erb and Melissa Mulholland. The signature on top is 'Melissa' and the one below is 'Raphael'.

## Appendix: Overview of the Modern Slavery Legislation applicable to SoftwareOne

### United Kingdom:

Modern Slavery Act 2015 (section 54): Requires businesses with an annual turnover exceeding £36 million to produce a modern slavery statement detailing the steps undertaken to prevent modern slavery in their operations and supply chains. UK Home Office statutory guidance (most recently updated in 2025) provides information on the recommended content and quality of these disclosures.

### Australia

Modern Slavery Act 2018: Like the UK Act, the Australian Modern Slavery Act requires businesses with an annual turnover of \$100 million or more to report on their efforts to address modern slavery risks in their operations and supply chains.

### United States

Trafficking Victims Protection Reauthorization Act (TVPPRA): Aims at preventing human trafficking and at assisting victims. It includes provisions that address labour trafficking, sex trafficking, and protection for victims.

California Transparency in Supply Chains Act (SB 657): Requires certain companies conducting business in California to disclose their efforts in eradicating slavery and human trafficking from their direct supply chains.

### European Union

Directive 2011/36/EU: Sets out measures to prevent and combat trafficking in human beings, protecting victims' rights and prosecuting offenders.

EU Strategy towards the Eradication of Trafficking in Human Beings 2021-2025: Aims to prevent trafficking, protect victims, and support prosecutions.

The Act on Corporate Due Diligence Obligations in Supply Chains (the "Supply Chain Act") came into force on 1 January 2023. The law regulates the responsibility of German enterprises to respect human rights in global supply chains.

Corporate Sustainability Due Diligence Directive (CSDDD) (Directive (EU) 2024/1760): Establishes due diligence obligations for certain companies in respect of actual and potential adverse human rights and environmental impacts in their own operations, subsidiaries and value chains, including forced labour and human trafficking risks. EU Forced Labour Regulation (Regulation (EU) 2024/3015): Prohibits the placing and making available of products made with forced labour on the EU market and their export. The Regulation entered into force in December 2024, will apply as of 14 December 2027 and is relevant to our ongoing supply chain risk assessment and supplier engagement activities.

Norway Transparency Act: Requires larger enterprises (including certain foreign enterprises offering goods or services in Norway that are subject to Norwegian taxation) to conduct human rights and decent working conditions due diligence in line with the OECD Guidelines for Multinational Enterprises, to publish an annual due diligence account by 30 June, and to respond to information

requests from the public. Following the acquisition of Crayon and our presence in Norway, this framework is relevant to our group-level human rights due diligence and transparency approach

## Canada

The Immigration and Refugee Protection Act: Addresses human trafficking through provisions concerning trafficking offenses, penalties, and support for victims.

The Victims Bill of Rights: Provides additional support and protection for victims of human trafficking

## International Frameworks

United Nations Guiding Principles on Business and Human Rights: Provides guidance for businesses on their responsibility to respect human rights, including issues related to modern slavery.

International Labour Organization (ILO) Conventions: Various conventions address forced labour, child labour, and human trafficking, including Convention 29 and Convention 182.