



Modern Slavery Statement

2020-21

IBS Software Europe Limited

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Modern Slavery Statement

1. Introduction

This statement is given to comply with IBS Software Europe Limited's (IBS) reporting obligations under Section 54 of the Modern Slavery Act 2015. It covers the steps taken by IBS during the Financial Year [2021] and has been approved by the board of directors.

IBS recognizes the importance of sustaining and promoting fundamental human rights in all of its operations. The company's values, principles, culture and employment policies work together to support the principles contained in the United Nation's Universal Declaration of Human Rights and the International Labour Organization Fundamental Principles and Labour Standards.

Broadly, IBS operates programs and policies that:

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws;
- Recognise employees' right to freedom of association;
- Encourage humane and safe working conditions;
- Strictly prohibit child labour;
- Prohibit human trafficking; and
- Promote a workplace free of discrimination and harassment.

2. Overview

2.1 Structure and Operations

IBS Software Europe Limited (Registration number: 04484344) is a software solutions provider servicing the global travel industry, operating across air cargo, flight, crew and aircraft maintenance operations. IBS also provides airline passenger services systems, ancillary product sales, loyalty program management, and business-to-business distribution networks for hospitality partners, as well as operating across tour and cruise networks.

We operate in the United Kingdom as a subsidiary of IBS Software Private Limited, India. We operate branches in Italy, Netherlands, Australia and France, and also fully own subsidiary companies based in Japan (IBS Software Japan Co Ltd), Germany (IBS Software GmbH) and China (IBS (Shanghai) Limited).

2.2 Supply Chains

As a software solutions provider, the bulk of our supply chains relate to IT services and suppliers. For the Global IBS requirements, we source from a range of providers across Europe, Singapore, United States, Korea, Japan, India and United Arab Emirates geographies. Our supply chains source a range of IT services and products, including licensing and use of existing software products, cybersecurity, internet services and hardware.

3. Risks of Modern Slavery Practices

While IBS Software Europe is aware of the potential risk of modern slavery in all countries and in all industries, we have not identified any areas of potential high risks of modern slavery within our supply chains. Our supply chains are reliant on services located in countries that would generally be considered low risk for incidences of modern slavery. We have not initiated any specific program to identify risks of modern slavery within our supply chains.

4. Actions taken by IBS

4.1 Code of Conduct

IBS has published a Code of Conduct (the Code) to establish and institutionalise a common code of conduct and ethical guidelines to direct and govern the operations of the company.

The Code is a document that applies not only to all directors, officers and employees of IBS, but also to third parties engaged by IBS such as consultants, advisors, suppliers, vendors, agents and contractors. It is therefore crucial in ensuring that IBS's operations are conducted appropriately and having regard to the risks of modern slavery.

The Code specifically identifies that all employees are equally entitled to human rights without discrimination and recognises the importance of sustaining and promoting fundamental human rights in the work that IBS carries out. These same obligations and recognitions must also be adopted by all third parties engaged by IBS.

The definition of 'modern slavery' under the Act includes an offence under Division 270 of the Criminal Code, most applicably slavery and forced labour, as well as 'the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.'

The Code itself explicitly notes the encouragement of humane and safe working conditions and the strict prohibition of child labour as features of IBS's culture which all employees, consultants, advisors, suppliers, vendors, agents and contracts are expected to uphold. Such aspects of modern slavery are therefore identified in the Code as antithetical to the way in which IBS operates.

4.2 Whistle Blower Policy

We operate a Whistle-blower Policy across our organisation and encourage open reporting in relation to specified matters. Employees can report their concerns confidentially, and these reports are taken seriously and there are no adverse repercussions where they have acted in the public interest.

As the Whistle-blower Policy is incorporated into the broader Code of Conduct, the policy also extends to any third party engaged by IBS, ensuring its comprehensive effectiveness.

Our Whistle Blower policy provides protection to employees who disclose information in relation (but not limited) to criminal offences, failures to comply with legal obligations, miscarriages of justice, and endangerment of health and safety of any individual. Our policy also covers concealment of any of these matters and operates not only where incidents have occurred, but also where any are likely or about to occur.

Modern slavery occurring within our operations and supply chains would be captured under each of these matters and employees who suspect or have knowledge of modern slavery are encouraged to report such occurrences under this policy.

The Policy specifically prohibits an employee from being subjected to any detriment or dismissal for raising a genuinely-held concern that is in the public interest, even if concerns identified by a disclosure made under the Whistle-blower Policy are ultimately upheld or justified. This is a key factor in ensuring the effectiveness of this policy.

If an employee is not satisfied with the outcome of an investigation carried out under the policy, they are able to report their concerns to external bodies – this is specifically allowed for under IBS's own Whistle-blower Policy and the same employee protections noted above will continue to apply to employees in relation to external disclosure.

IBS may also decide to refer an employee's or third party's disclosure to the relevant external authority, ensuring that where wrongdoing has occurred, appropriate remediation can be administered.

4.3 Employment Policies

In order to ensure that no occurrences of modern slavery arise directly within our operations, all IBS employees are issued with formal employment contracts and all pay is audited. IBS employees are all of legal working age and IBS does not employ any child labour. IBS does not hold identification or travel documents of its employees.

IBS has established an Anti-Sexual Harassment, Employee Grievance Resolution and Health & Safety policies that mitigate the risk of modern slavery occurring directly within our operations.

All IBS employment contract also comply with the local laws in the applicable jurisdiction.

4.4 Supplier obligations and adherence

IBS has a common procurement policy, which requires a link to our code of conduct to be included on all of our purchase orders.

5. Due Diligence

We carry out due diligence on our suppliers as part of our initiative to identify and mitigate risks. Multiple vendors are evaluated for all the transactions & ensure that we have alternate vendors for sourcing. Proper evaluation on local support, availability of spare parts, etc., are taken into consideration.

6. Assessing Effectiveness of Actions

IBS retains the right to modify the Whistle-blower Policy as appropriate to ensure it is up to date and to respond to any changes in standards or regulations. IBS also works to assess the effectiveness of the Whistle-blower policy, with both the Human Resources and Company Affairs Departments holding responsibility for ensuring that the policy is maintained, applied and, if necessary, updated appropriately.

Similarly, the broader enforcement of the Code of Conduct is also charged to the Human Resources and Company Affairs Departments within IBS. This responsibility of assessing the effectiveness of both the Whistle-blowing policy and the broader Code by these departments is explicitly mandated by the Code itself.

The enforcement of the Code of Conduct and whistle blower policy are annually audited by external auditors as part of SOX and SOC Audits. Compliance with the Code of Conduct is tracked, transgressions (if any) are noted and a report is provided to the Audit Committee on a quarterly basis.

7. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, IBS provides training to all staff on its policies and on the code of conduct when they join the company, and employees are able to access these policies on IBS's systems.

8. Consultation

The Code, incorporating the Whistle-blowing Policy, ensures effective compliance by IBS and the third parties with which it engages.

The code applies not only to IBS Software Europe Limited, but also each entity within the IBS group.

The same protections afforded by the Whistle-blower policy and Code of Conduct therefore also extend to the fully owned subsidiaries based in Japan, Germany and China, as well as the branches operating in Italy, Netherlands, Australia and France. It continues to extend and apply to the third parties engaged by those branches and subsidiaries, maintaining appropriate protections against modern slavery throughout the entire corporate group.

9. COVID-19

We understand that some workers may be more vulnerable to modern slavery during the coronavirus pandemic. IBS adopted government guidelines for COVID-19 secure workplaces and ensure staff wellbeing is considered at all times. IBS has enabled employees to work from home during the entire pandemic period. Technology enabled processes have been used to bring about BAU in a short time after onset of pandemic, as well as support employees to collaborate and engage effectively. Measures were taken to monitor the health and safety of employees and address concerns that they have. Flexible work options were given to help employees manage work life balance. All HR processes - hiring, on boarding, engagement, training and separation have been digitised and managed effectively during the pandemic. IBS employees continue to have access to our grievance procedures.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes IBS Software Europe Limited slavery statement for the financial year ending 31.03.2021. It was approved by the Board on 24 September, 2021.



Mrs T N Kanchana Chitra
IBS Software Europe Limited

Date: 24 September, 2021