MODERN SLAVERY
FY 2022 / 2023
Modern Slavery Statement

IBS Software Europe Limited’s mission is to revolutionise the travel industry by delivering advanced digital solutions that accelerate growth, enhance efficiency, and create exceptional customer experiences. The COVID-19 pandemic has highlighted the urgent need for digital transformation in the travel sector. As the industry recovers, businesses must adapt to unpredictable travel volumes, evolving customer expectations, and heightened competition. IBS Software is committed to empowering travel companies with innovative technologies to navigate these challenges successfully and thrive in the post-pandemic era.

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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 2023 and has been approved by the board of directors.

IBS Software is opposed to modern slavery in all forms; human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and child labour. This statement has been prepared in accordance with the reporting requirements of the Modern Slavery Act 2015 (the Act) and the associated guidelines. This report details the steps taken by IBS during the financial year ending 31 March 2023 to set out the steps it has taken to identify and address the risk of modern slavery occurring in its operations and supply chains.

IBS recognises 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 Organisation’s Fundamental Principles and Labour Standards.

Broadly, IBS operates programs and policies that:

- Provide fair and equitable wages, benefits & 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. STRUCTURE AND OPERATIONS

2.1 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). IBS Software Europe Limited together with its parent and all subsidiaries/fellow subsidiaries is referred to as the "Group".

2.2 Supply Chains

As a software solutions provider, the bulk of IBS’s supply chains relate to the procurement of Information Technology (IT) services. For global IBS requirements, IBS sources from a range of providers across Europe, Singapore, United States, Korea, Japan, India and United Arab Emirates geographies. Their supply chains source a range of IT services and products, including licensing and use of existing software products, cybersecurity, internet services and hardware.
3. MODERN SLAVERY RISKS IN THE OPERATIONS AND SUPPLY CHAINS

During this Reporting Period, in assessing the risks of modern slavery for IBS, the following aspects:

3.1 Supply Chain Risk – Supplier Industries

IBS Software Europe is aware of the potential risk of modern slavery in all countries and in all industries. As regards to our supply chain, IBS has not identified any areas of specific risk, and apply our engagement process and Code equally across all its suppliers to minimise the risk of Modern Slavery in IBS’s supply chain.

3.2 Supply Chain Risk - Geographic Areas

IBS Software Europe relies on international interconnected supply chains that are situated in countries generally recognised for their low susceptibility to incidences of modern slavery. By strategically establishing connections with suppliers in such countries, IBS Software Europe aims to mitigate the risk of involvement in any form of modern slavery throughout its supply chains. This approach aligns with the company's commitment to uphold ethical practices and promote human rights across its operations.

4. RISK MITIGATING ACTIONS

IBS is committed to taking action to assess and address modern slavery risks. The measures described in this section are part of the holistic approach employed by the IBS Software Group and adopted by IBS as part of that Group.

4.1 Code of Conduct

IBS has developed and implemented a Code of Conduct governing its business operations and supply chain. To align with legal frameworks, the Code incorporates IBS’s values, principles, culture and employment policies that work together to support the principles contained in the United Nation's Universal Declaration of Human Rights and the International Labour Organisation Fundamental Principles and Labour Standards.

As stated above, IBS operate under programs and policies that:

- Provide fair and equitable wages, benefits & 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
- Promote a workplace free of discrimination and harassment

IBS's Code of Conduct is a central pillar of these programs and policies. Within the Code itself, explicit emphasis is placed on the promotion of humane and safe working conditions, along with the unequivocal prohibition of child labour. These aspects of prevention of modern slavery are firmly embedded as integral elements of IBS’s corporate culture, expected to be upheld by all employees, consultants, advisors, suppliers, vendors, agents, and contractors. Any form of modern slavery is explicitly deemed contrary to the core principles and operational framework of IBS.
4.2 Whistle Blower Policy

IBS operates a comprehensive Whistle-blower Policy across its organisation, encouraging open reporting by IBS’s personnel. This policy ensures that employees can report concerns confidentially and without facing adverse repercussions when acting in the public interest.

The Whistle-blower Policy is integrated into IBS’s broader Code of Conduct, extending its coverage to any supplier or other third party engaged by the company, thus ensuring its effectiveness across all stakeholders. The policy offers protection to employees who disclose information related to criminal offenses, non-compliance with legal obligations, miscarriages of justice, and risks to health and safety. This policy also covers how these matters should be handled, addressing not only incidents that have occurred but also those that are likely or imminent.

Within the scope of the Whistle-blower Policy, IBS recognises that modern slavery within its operations and supply chains would fall under the aforementioned matters, actively encouraging employees who suspect or have knowledge of modern slavery to report such instances.

The policy explicitly prohibits subjecting employees to detriment or dismissal for raising genuinely-held concerns in the public interest. This provision is crucial in ensuring the effectiveness of the policy and fostering a safe reporting environment.

In the event that an employee is unsatisfied with the outcome of an internal investigation, they have the option to report their concerns to external bodies, as allowed by IBS’s Whistle-blower Policy. In such cases, the same level of protection for employees will continue to apply regarding external disclosures. IBS reserves the right to refer an employee’s or a third party’s disclosure to the relevant external authority if wrongdoing is identified. This ensures that appropriate remediation measures can be taken to address the reported issues.

Overall, IBS’s Whistle-blower Policy plays a vital role in promoting transparency, accountability, and the eradication of unethical or illegal practices within the organisation and its supply chains (including all forms of modern slavery).

4.3 Employment Policies

To uphold its commitment to prevent any instances of modern slavery within its operations, IBS ensures that all employees are provided with formal employment contracts and conducts regular audits to verify proper payment practices. Furthermore, IBS strictly adheres to regulations regarding legal working age, ensuring that no child labour is employed within the organisation. IBS does not retain any identification or travel documents of its employees, preserving their personal freedom and autonomy.

Recognising the need for comprehensive policies, IBS has implemented various measures to mitigate the risk of modern slavery occurring directly within its operations. These include the following:

- Anti-Sexual Harassment & Bullying Policy;
- Equal Opportunities Policy;
- Employee Grievance Resolution Policy;
- Anti-Bribery & Corruption Policy; and
- Health & Safety policies.
These policies not only contribute to the overall well-being and fair treatment of employees but also serve as safeguards against any potential modern slavery practices within IBS's business. IBS takes a diligent approach to ensure that all employment contracts comply with the local laws and regulations applicable in each jurisdiction where the company operates. This commitment underscores IBS's dedication to upholding legal standards and promoting responsible employment practices throughout its global operations. By incorporating these robust policies conducting regular reviews and updates of these policies and complying with local laws, IBS maintains a strong framework to prevent and detect any potential instances of modern slavery within its own operations. The company remains steadfast in its commitment to fostering a safe, ethical, and inclusive working environment for all employees.

4.4 Supplier Obligations and Adherence

IBS has implemented a comprehensive procurement policy aimed at ensuring ethical practices throughout its supply chain. As part of this policy, a direct link to the company's code of conduct is included on all purchase orders requiring suppliers to comply with it.

By mandating the inclusion of the code of conduct on purchase orders, IBS emphasises the importance of adhering to ethical guidelines and principles not only within its own operations but also among its suppliers and vendors. This proactive approach serves as a constant reminder of the company's commitment to conducting business in a responsible and transparent manner.

The inclusion of the code of conduct on purchase orders fosters a culture of accountability and integrity among IBS's supply chain partners. Suppliers and vendors are encouraged to familiarise themselves with the code of conduct and align their practices accordingly, ensuring that the entire procurement process aligns with ethical standards.

Moreover, this requirement demonstrates IBS's dedication to promoting responsible sourcing practices and mitigating the risks associated with unethical behaviours, such as modern slavery, human rights violations, and environmental harm. By making the code of conduct easily accessible to all stakeholders involved in the procurement process, IBS emphasises its commitment to fostering a sustainable and socially responsible supply chain.

Through this integrated approach, IBS strives to create a network of suppliers and vendors who share its values and adhere to the same high standards of ethical conduct. The link between the procurement policy and the code of conduct serves as a tangible manifestation of IBS's commitment to transparency, accountability, and promoting ethical business practices throughout its procurement activities.

5. DUE DILIGENCE

We carry out due diligence on our suppliers as part of the onboarding process as a key element of our initiative to identify and mitigate risks within our supply chain. 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 THE EFFECTIVENESS OF RISK MITIGATING ACTIONS

IBS assigns the Human Resources and Company Affairs Departments with the responsibility of regularly evaluating the effectiveness of the Whistle-blower policy and the Code of Conduct, to ensure that both policies are working in practice within the IBS business.
In addition, to ensure accountability, external auditors conduct annual audits, including SOX and SOC Audits, to assess the enforcement of the Code of Conduct and the whistle-blower policy. Compliance with the Code is monitored, any breaches are documented, and a quarterly report is submitted to the Audit Committee.

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 at any time.

8. CONSULTATION PROCESS

The Code, which encompasses the Whistle-blowing Policy, establishes a framework to ensure comprehensive compliance by both IBS Software Europe and the third parties it collaborates with. This Code extends beyond IBS Software Europe Limited and encompasses all entities within the IBS group. Therefore, the Whistle-blower policy and Code of Conduct provide the same safeguards not only to IBS Software Europe Limited but also to its fully owned subsidiaries located in Japan, Germany, and China, as well as the branches operating in Italy, Netherlands, Australia, and France. These protections continue to be extended and applied to third parties engaged by the branches and subsidiaries, maintaining appropriate measures to safeguard against the risks of modern slavery throughout the entire corporate group.

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 31.03.2023. It was approved by the Board on 21.09.2023.

Mrs T N Kanchana Chitra
IBS Software Europe Limited
Date: 21.09.2023
Modern Slavery Statement
2021-22

IBS Software Europe Limited
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Modern Slavery Statement

1. Introduction

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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:

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• 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 applicable 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 contractors 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 confidentiality, 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 31.03.2022. It was approved by the Board on 12 September, 2022.

Mrs T N Kanchana Chitra  
IBS Software Europe Limited  
Date: 22 September, 2022