

## MODERN SLAVERY ACT STATEMENT

### INTRODUCTION

Xebia recognises that human rights and human dignity are of paramount importance without any equivocation. To this end, Xebia UK Limited ("Xebia", "we", "us", "our") has an Anti-Slavery and Human Trafficking Policy, which incorporates the terms of the UK Modern Slavery Act, 2015. This Statement complements our Modern Slavery Act policy.

Xebia recognises that modern slavery is a crime and morally and legally repugnant. Any breach of anti-slavery and human trafficking legislation is criminal and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Xebia is committed to acting ethically and with integrity in all our business dealings and relationships, and we have strong policies to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This means that we at Xebia do our utmost to raise awareness of the dangers of modern slavery (in all its many guises) within our company and also amongst our suppliers and customers. We also take all reasonable steps to mitigate any risk of supporting these abhorrent practices within our supply chain.

Xebia is committed to ensuring transparency in our policies on this subject and ensures full compliance with anti-slavery and human trafficking legislation across the globe, including Modern Slavery Act, 2015 and the disclosure obligations therein.

This Statement has been approved by the Board of Directors of Xebia UK and constitutes Xebia's slavery and human trafficking statement for the purposes of Section 54 of the Modern Slavery Act, 2015.

### OUR BUSINESS

Xebia is a global Software Engineering and IT consulting company with offices in the Americas, Europe, the UK, India, Southeast Asia and the Middle East. We provide high-quality consultancy and offshore and nearshore services.

Our Company offers digital transformation and process automation, product engineering, digital integration, intelligent automation, cloud & infrastructure management services, and BPO solutions. More information is available on our website: <https://xebia.com/uk/>.

Xebia's supply chain encompasses three broad categories: (i) technology and software vendors, including licensed software providers; (ii) staffing and recruitment partners, including agencies engaged to source contract and permanent employees across our operating jurisdictions in India, the Middle East, the UK, Americas and Southeast Asia; and (iii) facilities and operational suppliers, including office management, advisors, consultants etc. Our highest-volume supply chain activity by headcount is in India and the Middle East, where we engage staffing and professional services partners on behalf of our global delivery operations.

## **DUE DILIGENCE ON SUPPLY CHAIN AND CORPORATE RISK ASSESSMENT**

Xebia asks all its Suppliers and other stakeholders to certify annual compliance with the Modern Slavery Act 2015. Where a supplier or stakeholder is unwilling or unable to certify, Xebia will first remind them of their legal obligations and provide relevant guidance. If, following such engagement, the supplier remains non-compliant or unable to provide satisfactory assurance, Xebia reserves the right to suspend or terminate the business relationship with that supplier. Any identified or suspected instances of modern slavery within our supply chain will be reported to the relevant authorities, and the implicated supplier relationship will be reviewed immediately by the Legal and Procurement Departments.

We expect high standards from all our subcontractors, suppliers and other business partners and have made this transparent to our significant suppliers wherever possible.

In addition, we require all vendors to confirm that they acknowledge and comply with the Modern Slavery Act as part of our standard contracting agreements.

We endeavor to ensure that our sub-contractors adhere to our policies and governance processes.

## **COMMUNICATION, AWARENESS AND POLICIES**

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

We have an Anti-Slavery and Human Trafficking Policy, and we ensure all employees are made aware of modern slavery, how to recognise it, and how to report concerns. All new employees are required to complete mandatory modern slavery awareness training as part of their induction program. In addition, targeted refresher training is provided annually to all employees in procurement, vendor management, HR, and legal functions, given the heightened exposure of these roles to supply chain risk. Training completion is monitored by the HR Department and reported to senior management.

We also have a Whistle-blower Policy which encourages reporting concerns regarding modern slavery anywhere internally or within our supply chain.

## **SUPPLIER AGREEMENTS AND PERFORMANCE MONITORING**

Xebia asks all its suppliers to warrant that they are fully compliant with, and adhere to, anti-modern slavery requirements as well as the reporting of any recognised Modern Slavery Act, 2015 practices or issues. Xebia reminds suppliers to be vigilant on an ongoing basis.

## KEY PERFORMANCE INDICATORS:

Xebia recognises the importance of measuring the effectiveness of its anti-slavery efforts through defined, trackable indicators. We are currently developing a set of key performance indicators across our supply chain compliance, training, and reporting functions. These metrics will be formally adopted and reported against in our next Modern Slavery Act Statement for the financial year ending 31 December 2026.

## CONTINUOUS IMPROVEMENT:

Xebia is committed to strengthening its approach to preventing modern slavery through continuous review of our policies, due-diligence processes, and supplier management practices. We seek to enhance transparency across our operations and maintain an ethical and responsible supply chain.

## SUMMARY

Xebia takes a holistic approach to the issue of modern slavery and human trafficking. Our various departments (Legal, HR, Procurement) work together to ensure that everyone within the organisation is aware of the subject and vigilant in recognising it. We aim to keep the highest standards in our processes to underline our commitment to anti-slavery.

This Statement is signed by me on behalf of the Company.



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Shankar Dastidar  
Director - Xebia UK  
January 1st, 2026

