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1: Policy Statement

Ensono is a managed IT service provider, covering mainframes, distributed systems and cloud platforms. Ensono's 'business critical IT' approach combines a focus on business outcomes together with a structured client engagement methodology and supporting services and infrastructure. Ensono group operates internationally, with its headquarters situated in the USA (Downers Grove, Illinois) and offices in the UK, Germany, India and Poland.

Ensono is committed to its role in the fight to tackle modern slavery and human trafficking and in its objective to respect all human rights prescribed under international human rights standards, including the Universal Declaration of Human Rights. We are strongly opposed to the unethical treatment of people, including any acts of slavery or human trafficking, and we continue to be committed to ensuring that we maintain compliance with all applicable human rights laws, trade ethically, source responsibly, and work to prevent modern slavery, forced labour and human trafficking throughout our organization and in our supply chain, including by ensuring that our organization and supply chain apply wages and working time that shall, as a minimum, comply with all applicable laws, prohibit the hiring of slave and forced labour and prevent practices that contribute to human trafficking.

2: Scope

This statement covers Ensono, Inc., a corporation incorporated in Delaware, US, along with its direct and indirect subsidiaries including Ensono, LLC, a limited liability company established in Delaware, USA, Ensono Limited, a company incorporated in the UK, Ensono Digital Limited, a company incorporated in the UK, Ensono Technologies LLP, a limited liability partnership established in India, Ensono GmbH, an entity established in Germany, Ensono Technologies GmbH, an entity established in Switzerland, and Ensono sp. z o.o., a subsidiary incorporated in Poland, each part of the Ensono Group. More than 3,700 people work for Ensono Group, and in our financial year ending 31 December 2024, Ensono Group had a global annual turnover of USD 977,133,000.

This statement highlights the approach we have taken during the financial year January 1, 2024 - December 31, 2024, to combat modern slavery in our organization and supply chain.

3: Roles and Responsibilities

Various teams within Ensono have responsibility for upholding Ensono's anti-slavery initiatives as this initiative crosses multiple business operations.

- **Legal**: responsible for interpreting and implementing policies designed to prevent modern slavery, forced labour, and human trafficking within the Company's operations.
- **Procurement**: carry out supplier assessment when onboarding a new supplier or entering into a new contract or renewal with a supplier; conduct periodic vendor management reviews for key and high-risk vendors.
- Culture and People Experience: exercise oversight with the objectives of ensuring that



no modern slavery practices take place within the business, including ensuring that all employees have a right to live and work in their country of residence, are paid in accordance with any minimum wage regulations, and that any complaints, issues or other concerns are addressed in a manner that maintains the fundamental human rights of each individual.

We are committed to the continuous improvement of our processes and procedures to ensure that no form of forced or compulsory labour or trafficking of persons exists within our supply chain.

4: Ownership

The Legal Department is responsible for resolving questions of interpretation about this policy.

5: Policy

5.1 Structure, Supply Chain & Responsibility

5.1.1 Structure

Ensono carries out managed IT services for its clients, who span a range of industries and organization sizes. Its business is operated predominantly in the USA, the UK and India, with a smaller physical presence in Germany, Poland, Switzerland, Singapore and Brazil; we also utilize hardware and software sub-contractors and vendors internationally.

5.1.2 Geographic Scope, Impact Assessment & Supply Chain

The majority of our suppliers maintain similarly stringent anti- slavery policies to Ensono. A significant part of our workforce is located in India and USA where Ensono is committed to maintain compliance with all labour laws. Our key vendors and subcontractors are predominately located in the USA, which is largely considered a lower risk country with respect to modern slavery risks.

5.1.3 Our Policies and Procedures on slavery and human trafficking

Our Code of Conduct and Ethics highlights our core values of honesty, reliability, collaboration, curiosity and passion as well as our commitment to compliance with all laws and regulations relating to modern slavery and strict prohibition of forced labour, slavery and human trafficking in our business and within our supply chain. We have effective policies and procedures in place that underpin our commitment to ensure that there is no modern slavery, forced labour or human trafficking in our supply chains or in any part of our business. We review and update all our policies on an annual basis. Some of these policies include:

- Ensono's Code of Conduct and Ethics (with Guidelines)
- Supplier Code of Conduct
- Whistleblower Protection Policy

We also require that suppliers remain subject to applicable policies that ensure their



commitment to the required standards, which are also integrated into the supplier onboarding process.

Our Whistleblower Protection Policy provides a mechanism and assurance to associates to raise any concerns they may have with respect to violation of laws or any ethical practices, which could include any modern slavery concerns within Ensono or its supply chain. This policy ensures concerns are diligently investigated, with appropriate action taken.

5.1.4 Working with Suppliers

Since 2016, our standard supplier contracts contain provisions requiring our suppliers' adherence to the Modern Slavery Act 2015. In the event of a violation of this provision, Ensono reserves the right to terminate its relationship with the supplier and in some cases, has other identified remedies for breach such as penalties, refunds or replacements.

Furthermore, Ensono is committed to meeting the following standards and has highlighted in our Supplier Code of Conduct that all our suppliers must also:

- Provide safe and healthy working conditions at all their operations and meet or exceed all legal requirements for compensation.
- Ensure human rights are respected and the principles enshrined in the Universal Declaration of Human Rights and adopted.
- Treat people with dignity and respect, and specifically:
 - Not employ child labour, consistent with the principles contained in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at work.
 - Prohibit forced labour consistent with ILO Convention No 29, on Forced Labour and basic principles contained in the International Labour Organization's 1998
 Declaration on Fundamental Principles and Rights at work for elimination of all forms of forced or compulsory labour.
 - Not treat or threaten to treat an individual harshly or inhumanely. Harsh or inhumane treatment includes sexual harassment or abuse, corporal punishment, coercion, or verbal abuse.
 - o Not engage in human trafficking (as defined by the UN in Article 3, paragraph (a) of the Protocol to Prevent, Suppress and Punish Trafficking in Persons and as required by the California Transparency in Supply Chains Act of 2010).
 - o Comply with applicable wage and hour labour laws of the country in which they operate, including through adherence to rules designed to limit overtime.
 - o Prohibit the use of forced, bonded (including debt bondage) or indentured labour or involuntary prison labour. All work will be voluntary, and workers should be free to leave work or terminate employment upon reasonable notice. Prohibited actions include transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services.
 - o Comply, at a minimum, with the applicable labour and environmental laws and regulations of the country where the materials and products are produced.

5.1.5 Staff training and on-going anti-slavery initiatives.

Ensono's Code of Conduct prescribes certain values and principles which Ensono has committed to in all of its operating territories. This Code of Conduct specifies certain non-



negotiable minimum standards of behavior in key areas such as fairness, honesty, and compliance with all laws.

The Code of Conduct has been provided to all of our associates globally. Associates are required to annually certify that they have read and agree to comply with Ensono's Code of Conduct. The Code of Conduct specifically addresses forced labour to ensure every associate is aware of and understands our obligations and expectations in this area, whilst encouraging vigilance in protection against exploitation, child labour and human trafficking. To ensure understanding and adherence to our Code of Conduct, we also provide regular training on an annual basis to our associates on the Code of Conduct.

To the best of our knowledge, we are not aware of any incidents of modern slavery or human trafficking associated with our supply chain, and continue to monitor this going forward.

6: References and Related Documents

Ensono Standard Processes	
Code of Conduct and Ethics (with Guidelines)	
Supplier Code of Conduct	
Whistleblower Protection Policy	

7: Definitions

Jargon/ Acronym/ Term	Definition / Description
Statement	Any Ensono corporate governance guidance in the form of a policy or procedure
The Company	Refers to Ensono
Code of Conduct	Ensono's Code of Conduct and Ethics and related Guidelines

This statement is published in accordance with Ensono's obligations under section 54 of the Modern Slavery Act 2015. This statement has been and constitutes the slavery and human trafficking statement of the Ensono Group (including Ensono Limited and Ensono Digital Limited) for the financial year ending 31 December 2024. It was approved by the board of directors of Ensono, Inc. on 23 May 2025 and will be reviewed and updated as needed, and in any event on an annual basis.

Name of director: Peter Bazil

ASE

Date: May 23, 2025