

OUR COMMITMENT

SYSTRA Limited has zero tolerance towards slavery, servitude, forced or compulsory labour and human trafficking (modern slavery), and any violation of, and crime against fundamental human rights. We comply with all laws and regulations that govern the prevention of these practices and are committed to fostering a culture where these are not tolerated.

This statement is made in relation to the Modern Slavery Act 2015 and sets out SYSTRA Limited's actions and activities focused on identifying and addressing potential modern slavery risks within our business and supply chain for the financial year ending 31 December 2025. As a professional services provider we consider our business activities to be low risk in relation to slavery and human trafficking and we can confirm that no instances of modern slavery were identified during the reporting period. However, we are committed to remaining vigilant in identifying such risks and taking the necessary action to address these fully.

Our SYSTRA values are embodied in our Behavioural Framework which sets out expectations of how our colleagues should conduct themselves. At the heart of this are our safety, ethics and sustainability commitments. This is supported by a governance framework that includes a comprehensive set of policies and operational processes which are reviewed annually. Our relevant employment policies are set out as follows:

- Code of Ethics
- Ethics & Compliance Policy
- Dignity at Work Policy
- Equality, Diversity & Inclusion Policy

We recognize the importance of our partners in our supply chain operating in accordance with our standards. In order to ensure these are met, all suppliers were required to agree and accept SYSTRA Limited terms and conditions, they were also required to provide information regarding their supply chain management through our Business Partner Due Diligence process. As part of this process, we completed modern slavery due diligence checks on 64 suppliers and applied risk-based due diligence across our supply chain. This was assessed by and tailored to the nature of the supplier relationship and the goods or services being procured, with additional focus applied where risk or spend indicators were identified. Where a supplier did not hold any of the requested policies, we did not engage them as a partner or supplier. We undertook our annual supplier desktop audit which allowed suppliers to give feedback on any deficiencies they had identified in our policies or practices.

SYSTRA is committed to continually reviewing our policies and processes to ensure they remain fit for purpose and adapt to the ever-changing risks arising in relation to modern slavery. During the year ending 31 December 2025 the following actions were taken:

- Reviewed and updated our Business Partner Due Diligence procedure for all suppliers and partners in relation to supply chain management to request information on the measures they implement to prevent modern slavery. This covered 213 business partners, of which 9 were subjected to further due diligence checks. Ultimately all proposed business partners passed the process and were accepted.
- Reviewed our Modern Slavery Statement and procedure in line with updated legislative requirements.

We will continue to prioritise our focus on this important area and have committed to the following actions in 2026:

- Continue to review our due diligence procedures for all suppliers in relation to modern slavery and trafficking.
- Review of our existing mandatory modern slavery training for all employees to ensure it is effective.
- Developing key performance indicators in relation to preventing modern slavery and human trafficking.
- Raising awareness of modern slavery risks within the organisation and its supply chain through the implementation of ongoing training.

The SYSTRA Ltd Modern Slavery Policy can be found [here](#).

