

# Modern Slavery and Human Trafficking Statement 2024

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps that DataArt Technologies UK Ltd as a part of DataArt enterprise group (hereinafter referred to as "DataArt") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. DataArt has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Our business

DataArt is a global software engineering firm and a trusted partner for progress, building future-proof technology for market leaders. Our most valuable asset is the talent and expertise of our team members. And our commitment to the People-first principle is an absolute value for DataArt. We blend engineering excellence with human values and responsibility at every level – from each team member to the communities where we operate and our planet and humanity.

## Our policies

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include but are not limited to:

1. **Compliance Policy** commits DataArt to conduct its business in accordance with the statutory requirements of the countries in which it operates. Each individual involved in DataArt's business activities is obligated to obey all applicable laws and corporate guidelines.
2. **Code of Conduct** explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
3. **Social and Environmental Policy** defines the primary goals and the focus areas for DataArt regarding environmental and social issues, and establishes a framework to efficiently manage respective sustainability activities following international standards accepted by DataArt.
4. **Equal Opportunities Policy** sets out our approach to equal opportunities and the avoidance of discrimination at work.
5. **Anti-Discrimination, Harassment and Bullying Policy** commits DataArt to provide a working environment free from discrimination, harassment and bullying and ensure all staff are treated, and treat others, with dignity and respect.

6. **Whistleblowing Policy** is established so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
7. **Grievance Procedure** defines the steps employees should take if they face any situation related to the company, work, or work relationship that directly affects their interests or creates discomfort.
8. **Code of Sustainable Supplier** establishes a set of guidelines and principles that outline the expected behaviour and practices of suppliers within DataArt's supply chain.
9. **Diversity, Equity, Inclusion and Belonging Policy** outlines the principles guiding DataArt in promoting Diversity, Equity, Inclusion, and Belonging (DEIB) across the company, as well as addresses the formation of a diversified workforce, emphasizing equity promotion and inclusion practices.

## Our suppliers

Our supply chains comprise mainly human resources who perform skilled services and third-party suppliers who provide software development services, IT and office equipment, software products and other goods which we require to run our offices around the world. However, as a software engineering company, DataArt does not have an extensive range of suppliers in those sectors where modern slavery or human trafficking would generally be a material risk.

## Due Diligence

DataArt undertakes appropriate due diligence before approving new suppliers and regularly reviews its existing suppliers. We require contractors, suppliers and service providers to adhere to all applicable domestic laws and encourage them to conduct their business in a manner consistent with policies and the ILO's core labor principles, including the elimination of forced and compulsory labor and the abolition of child labor. Requirements on compliance with anti-trafficking and human rights legislation form part of our contract with the suppliers.

We ensure that slavery and human trafficking are not taking place within DataArt or our supply chains. To achieve this the following measures are taken by DataArt but not limited to:

- All of DataArt directly-employed staff are on standardized terms and conditions.
- Background verification checks are conducted for all staff members prior to starting cooperation with DataArt.
- All agencies who supply DataArt with staff provide verification of the identity and right to work for their staff in the respective jurisdiction.
- Compliance with respective regulations is in the scope of DataArt's annual compliance audit.
- Social risks have been assessed and are updated regularly in all locations where DataArt operates.

- Grievance mechanisms are established to enable those who become aware of any wrongdoings to report their concerns at the earliest opportunity so that they can be properly investigated.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we conduct mandatory compliance training for all employees and contractors during their onboarding to the company and on an annual basis.

## Our effectiveness in combating slavery and human trafficking

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees and contractors.
- No reports are received from the public.
- No reports are received from any law enforcement agencies

We continuously monitor staff members satisfaction level by means of conducting internal surveys. In recent years, DataArt repeatedly wins awards and achieves the top rankings as the best employer in the countries where we operate.

## Commitment

We will continue to apply a zero-tolerance approach to forced labour, slavery and human trafficking in any form, in our business and supply chain.

This statement has been approved by Directors, with respect to the financial year ending 31 December 2023.



Dmitry Bagrov

Director

DataArt Technologies UK Ltd.

May 2024