
Doc. Type: Policy	Doc. ID: CMP(UK)-100-PL	Status: Approved	Version: 1.0
Author: Stanislava Hejnova	Classification: Public	Effective Date: January 2026	Next review: Q1-2027

Avenga Modern Slavery and Human Trafficking Statement

Doc. Type: Policy	Doc. ID: CMP(UK)-100-PL	Status: Draft	Version: 0.1
Author: Stanislava Hejnova	Classification: Public	Effective Date: January 2026	Next review: Q1-2027

Introduction

Avenga Group (“Avenga”, “we”, “our”, or “the Group”) is committed to ensuring that modern slavery, human trafficking, forced labour, and other forms of exploitation have no place in our business operations or supply chains.

We uphold the highest ethical standards and respect for human rights, as reflected in our Code of Conduct, Compliance Policy, and Supplier Standards.

This statement is made pursuant to Section 54 of the *UK Modern Slavery Act 2015* and sets out the actions taken by Avenga to prevent modern slavery and human trafficking within our organization and across our global operations during the financial year ending 2025.

Our Structure and Business

The Avenga Group operates through several legal entities located in Europe, the Americas, and Asia, with delivery centers in countries such as Poland, Ukraine, Germany, Argentina, Malaysia, and the United States.

Our corporate headquarters are located in Vinohradská 1511/230, 11000 Prague 10, Czech Republic, ID No.: 17802733. Certain entities within the Avenga Group conduct business or provide services in the United Kingdom and may therefore fall within the scope of the *Modern Slavery Act 2015*.

Our Commitment and Policies

Avenga maintains a zero-tolerance approach to any form of modern slavery or human trafficking. We are guided by internationally recognized standards, including the *Universal Declaration of Human Rights*, the *ILO Fundamental Conventions*, and the *UN Guiding Principles on Business and Human Rights*.

Key policies that support our commitment include:

- **Code of Conduct** – establishes principles of ethical behavior, integrity, and respect for human rights.
- **Supplier Code of Conduct** – requires all suppliers and contractors to comply with applicable labour laws, ensure fair working conditions, and prohibit forced or child labour.
- **Avenga Group Compliance Policies** – which form the foundation of our compliance system and establish a unified framework for ethical business conduct across all Avenga Group companies.

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These policies define clear principles and rules on:

- Anti-Corruption and Bribery
- Anti-Money Laundering and Counter-Terrorist Financing
- Anti-Slavery and Human Rights
- Gifts and Hospitality
- Charitable and Political Donations
- Third Party Due Diligence and Supplier Relations
- Conflicts of Interest
- Compliance Reporting and Internal Investigations
- Cooperation with Public Authorities and Competitors
- Principles for Using Generative AI

Together, these policies ensure that Avenga operates in accordance with international regulations, ethical business standards, and transparency requirements. They promote accountability, integrity, and respect for human rights in all operations.

Supply chain and risk management

Our supply chain primarily consists of professional service providers, technology vendors, and recruitment partners who support the delivery of IT consulting and software development services.

Although the overall risk of modern slavery in our sector is considered low, we recognize potential exposure in areas such as:

- Use of subcontracted or temporary labour.
- Third-party service providers in higher-risk jurisdictions.
- Procurement of equipment and materials through complex global supply chains.

To address these risks, Avenga:

- Conducts supplier due diligence before engagement, including ethical and compliance checks.
- Requires suppliers to adhere to our Supplier Code of Conduct and relevant contractual clauses.
- Reserves the right to audit suppliers and terminate relationships in case of non-compliance.
- Periodically reviews and updates risk assessments across our supplier base.

Due Diligence and Preventive Measures

Avenga's due diligence processes include:

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- Screening suppliers and business partners for ethical and legal compliance.
- Evaluating high-risk suppliers and applying enhanced review processes where necessary.
- Integrating anti-slavery commitments into our contractual terms and procurement procedures.
- Collaborating with People and Culture and Procurement departments to identify and mitigate labour exploitation risks.

Training and awareness

To strengthen our internal capacity to prevent modern slavery:

- Compliance and People teams provide annual training and periodical communication campaigns on ethical conduct, anti-slavery principles, and responsible procurement.
- All employees are encouraged to identify and report potential indicators of exploitation.
- New hires receive mandatory induction training on the Code of Conduct and our human rights commitments through Compliance.

Monitoring, control and continuous improvement

Avenga continually evaluates the effectiveness of our actions to prevent modern slavery through:

- Regular reviews of internal policies and supplier due diligence processes.
- Monitoring compliance across our global operations.
- Updating training content and risk assessments based on new regulations or identified gaps.

We are committed to further strengthening our human rights framework and expanding supplier engagement to promote transparency and ethical sourcing.

Approval and publication

This statement has been approved by the Board of Directors of Avenga Group and will be reviewed and updated annually.