

# Modern Slavery Act Transparency Statement 2023 Trifork Holding AG

This statement is issued for the financial year ending 31. December, 2023 (as approved by the Board of Directors on 14 December, 2023 and covers the activities of the Trifork Group companies).

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# Modern Slavery Act Statement

## Applicability

- This Statement on Modern Slavery is applicable to Trifork Holding AG, its subsidiaries, and group companies (henceforth referred to as Trifork) pursuant to Section 54 (1) of the UK Modern Slavery Act 2015, and Section 3 of the Australia Modern Slavery Act, 2018 and any other applicable Modern Slavery regulations (together the Modern Slavery Legislation). Modern Slavery covers harassment through forced and compulsory labor, servitude, slavery and human trafficking in the supply chains. We are committed to uphold human rights and the steps we have undertaken to ensure that slavery and human trafficking do not operate within our business or our supply chain.

## Who we are

- Trifork is a global leader in next-generation digital services and consulting. We enable clients in more than 15 countries to navigate their digital transformation. We inspire and teach customers and colleagues about new possibilities within technology. We build innovative software solutions and operate and maintain these for our customers. Our business is organized into self-contained business units as shown at <https://trifork.com/about/>.
- Since our founding in 1996, we have been motivated by pushing the boundaries of how new technologies and methods can be discovered, applied, and developed into novel solutions that enable our customers to become industry leaders.
- We are committed to running our business responsibly. We strive to maintain the highest ethical principles and to respect human rights in all our business relationships. The Trifork Code of Conduct (“COC”) sets out the overall standards and commitments towards ethical conduct, anti-corruption and legal compliance. These standards extend to our suppliers, partners, agents, directors, employees and subcontractors. Our supply chains include IT development and professional

services, IT hardware and software, and infrastructure services as well as accounting, legal, and HR services. We also have building material and technology suppliers for our Smart Buildings operation.

- We believe that our vision success' must embrace actions that ensure sustainable performance within the environmental, social, and economic space. Our Annual Reports and ESG (Sustainability) Reports and Code of Conduct on [www.investor.trifork.com/statutes/](http://www.investor.trifork.com/statutes/).com provide more information on our sustainable business performance.

## **Policies and Processes**

- We are signatories to the United Nations Global Compact and uphold these principles in our business and in the wider business operations. Our COC entails our Ethics and Supplier Code of Conduct which are available on our corporate website <https://investor.trifork.com/statutes>, laying down the expectations that we have from our employees and suppliers in the conduct of business activities globally.
- The Trifork COC, sets forth our core values, shared responsibilities, global commitments, and promises. The COC expresses Trifork's commitment to conducting business ethically.
- Our Whistleblower Policy provides our stakeholders with a safe process to raise concerns without fear of retaliation <https://trifork.com/whistleblower/>. Similarly, our COC describes the expectations that we have of our suppliers, including forced labor, discrimination-free workplace, wages and benefits, and ethical dealings.
- We have zero tolerance for slavery and human trafficking. We will not tolerate any such activities within our operations or within our supply chain and are committed to taking appropriate steps to ensure that everyone who works for Trifork – in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected.

## **Risk Assessment**

- Trifork's Business Unit leads undertake the daily due diligence checks on suppliers, in order to ensure compliance with our COC and the Modern Slavery Legislation. In addition, audit checks are also performed on a group level on Trifork's suppliers in those industries and geographies where non-compliance is deemed more likely, even though they represent a minimal percentage of Trifork's overall expenditure. Our supply chain and business partners generally operate in an environment with little or low risk of uncompliant actions.
- We make efforts to build long-standing relationships with local suppliers and contractors to effectively enforce our ethical business standards.
- We also aim to ensure an ongoing high level of understanding amongst our workforce of the risks of modern slavery and human trafficking in our supply chains and our business. Accordingly, all employees must undertake e-training once per year in relation to the Code.
- As part of our commitment to identify and eliminate modern slavery, we take a risk-based approach to understanding and monitoring our supply chain, which is an ongoing area of focus for 2024.

## **Effectiveness and Reporting**

- Trifork has in place a whistleblower policy published on the company's official website, which details the whistleblowing process, and a formal grievance redressal framework that enables everyone, including partners, contractors and employees, to raise their concerns at a single platform with complete confidentiality, and we operate a strict 'non-retaliation' policy to safeguard the interests of whistle-blowers.
- We aim to encourage openness and transparency by actively supporting employee and supplier engagement and with the ability to raise concerns which can be reported through hotline numbers mentioned in the policy and through <https://trifork.com/whistleblower/>.

- Trifork's suppliers are also required to assess their businesses and supply chain to ensure compliance with the provisions of the Modern Slavery Legislation, anti-human trafficking and other human rights requirements as incorporated under this statement.

**Resources**

- Modern Slavery is a complex challenge which requires ongoing, evolving and continually improving efforts. Over the course of the next financial year Trifork will continue to review its internal processes to ensure that its obligations under the Modern Slavery Legislation are met.

**On behalf of Trifork Holding AG**



CEO and founder Jørn Larsen