

# MODERN SLAVERY

FY22/23



# Modern Slavery Statement

IBS Software Europe Limited's mission is to revolutionise the travel industry by delivering advanced digital solutions that accelerate growth, enhance efficiency, and create exceptional customer experiences. The COVID-19 pandemic has highlighted the urgent need for digital transformation in the travel sector. As the industry recovers, businesses must adapt to unpredictable travel volumes, evolving customer expectations, and heightened competition. IBS Software is committed to empowering travel companies with innovative technologies to navigate these challenges successfully and thrive in the post-pandemic era.

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## INTRODUCTION

IBS Software is opposed to Modern Slavery in all forms; human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour. This statement has been prepared in accordance with the reporting requirements of Australia's Modern Slavery Act 2018 (Cth) and the associated guidelines. This report details the steps taken by IBS Software during the foreign financial year ending 31 March 2023 to set out the steps they have taken to identify and address the risk of Modern Slavery occurring in its operations and supply chains.

IBS recognises the importance of sustaining and promoting fundamental human rights in all of its operations. The company's values, principles, culture and employment policies work together to support the principles contained in the United Nation's Universal Declaration of Human Rights and the International Labour Organisation Fundamental Principles and Labour Standards.

Broadly, IBS operates programs and policies that:

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws;
- Recognise employees' right to freedom of association;
- Encourage humane and safe working conditions;
- Strictly prohibit child labour;
- Prohibit human trafficking; and
- Promote a workplace free of discrimination and harassment

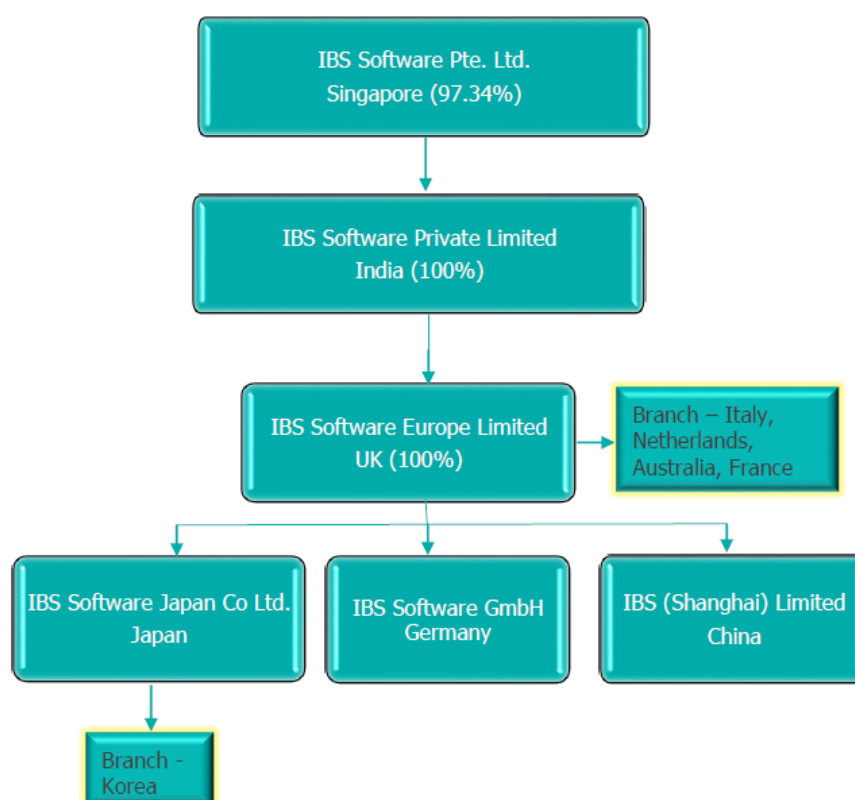


## STRUCTURE AND OPERATIONS

### Operations

IBS Software Europe Limited (ARBN 624 066 459) is a software solutions provider servicing the global travel industry, operating across air cargo, flight, crew and aircraft maintenance operations. IBS also provides airline passenger services systems, ancillary product sales, loyalty program management and business-to-business distribution networks for hospitality partners, as well as operating across tour and cruise networks.

They operate in Australia as a registered foreign company and have our registered headquarters in the United Kingdom. IBS is a subsidiary of IBS Software Private Limited India and operates branches in Italy, Netherlands, Australia and France. IBS also fully owns subsidiary companies based in Japan (IBS Software Japan Co Ltd), Germany (IBS Software GmbH) and China (IBS (Shanghai) Limited).



### Supply Chains

As a software solutions provider, the bulk of IBS' supply chains relate to Information Technology (IT) services. For global IBS requirements, IBS sources from a range of providers across Europe, Singapore, United States, Korea, Japan, India and United Arab Emirates geographies. IBS' supply chains source a range of IT services and products, including licensing and use of existing software products, cybersecurity, internet services and hardware.

#### Vendor & Supplier List – IBS Europe Limited

Vendor/ Consultant	Supplier/ Location	Service/ Product procured by IBS
Dell Products	UK	Dell Service Renewals, Laptops
Oracle Corporation Limited	UK	Oracle Support Renewals
PCM Technology Solutions UK Ltd	UK	Laptops
Pendulum IT Solutions	UK	Laptops
ARINC	UK	Internet Links
Marsh Commercial	UK	Insurance
Adobe	Ireland	Adobe Licenses

## **MODERN SLAVERY RISKS IN THE OPERATIONS AND SUPPLY CHAINS**

During this Reporting Period, in assessing the risks of Modern Slavery for IBS, the following aspects were considered:

### **Supply Chain Risk**

IBS Software Europe is aware of the potential risk of Modern Slavery in all countries and in all industries. As regards to their supply chain, their engagement process with the suppliers and the Codes governing their appointment ensure that the risk of Modern Slavery is minimal.

### **Geographic Risk**

IBS Software Europe heavily relies on supply chains that are interconnected with various services situated in countries generally recognised for their low susceptibility to incidences of Modern Slavery. By strategically establishing connections with such countries, IBS Software Europe aims to mitigate the risk of involvement in any form of Modern Slavery throughout its supply chains. This approach aligns with the company's commitment to uphold ethical practices and promote human rights across its operations.

## **RISK MITIGATING ACTIONS**

IBS is committed to taking action to assess and address Modern Slavery risks. The measures described in this section are part of the holistic approach employed by the IBS Software Group and adopted by IBS as part of that Group.

### **Code of Conduct**

IBS has developed and implemented a Code of Conduct governing its business operations and supply chain. To align with legal frameworks, the Code incorporates IBS's values, principles, culture and employment policies that work together to support the principles contained in the United Nation's Universal Declaration of Human Rights and the International Labour Organisation Fundamental Principles and Labour Standards.

As stated above, IBS operate under programs and policies that:

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Recognise employees' right to freedom of association
- Encourage humane and safe working conditions
- Strictly prohibit child labour
- Prohibit human trafficking
- Promote a workplace free of discrimination and harassment
- IBS's Code of Conduct is a central pillar of these programs and policies

Within the Code itself, explicit emphasis is placed on the promotion of humane and safe working conditions, along with the unequivocal prohibition of child labour. These aspects of prevention of Modern Slavery are firmly embedded as integral elements of IBS's corporate culture, expected to be upheld by all employees, consultants, advisors, suppliers, vendors, agents, and contractors. Any form of Modern Slavery is explicitly deemed contrary to the core principles and operational framework of IBS.

### **Whistle Blower Policy**

IBS operates a comprehensive Whistle-blower Policy across its organisation, encouraging open reporting by IBS personnel. This policy ensures that employees can report concerns confidentially and without facing adverse repercussions when acting in the public interest.

The Whistle-blower Policy is integrated into IBS's broader Code of Conduct, extending its coverage to any third party engaged by the company, including contractors and suppliers, thus ensuring its effectiveness across all stakeholders.

The policy offers protection to employees who disclose information related to criminal offenses, non-compliance with legal obligations, miscarriages of justice, and risks to health and safety. This policy also covers how these matters should be handled, addressing not only incidents that have occurred but also those that are likely or imminent.

Within the scope of the Whistle-blower Policy, IBS recognises that Modern Slavery within its operations and supply chains would fall under the aforementioned matters, actively encouraging employees who suspect or have knowledge of Modern Slavery to report such instances.

The policy explicitly prohibits subjecting employees to detriment or dismissal for raising genuinely-held concerns in the public interest, even if the concerns identified through disclosures are ultimately not validated. This provision is crucial in ensuring the effectiveness of the policy and fostering a safe reporting environment.

In the event that an employee is unsatisfied with the outcome of an internal investigation, they have the option to report their concerns to external bodies, as allowed by IBS's Whistle-blower Policy. In such cases, the same level of protection for employees will continue to apply regarding external disclosures.

IBS reserves the right to refer an employee's or a third party's disclosure to the relevant external authority if wrongdoing is identified. This ensures that appropriate remediation measures can be taken to address the reported issues.

Overall, IBS's Whistle-blower Policy plays a vital role in promoting transparency, accountability, and the eradication of unethical or illegal practices within the organisation and its supply chains (including all forms of Modern Slavery).

### **Employment Policies**

To uphold its commitment to prevent any instances of Modern Slavery within its operations, IBS ensures that all employees are provided with formal employment contracts and conducts regular audits to verify proper payment practices. Furthermore, IBS strictly adheres to regulations regarding legal working age, ensuring that no child labour is employed within the organisation. IBS does not retain any identification or travel documents of its employees, preserving their personal freedom and autonomy.

Recognising the need for comprehensive policies, IBS has implemented various measures to mitigate the risk of Modern Slavery occurring directly within its operations. These include the establishment of the following:

- Anti-Sexual Harassment & Bullying Policy
- Equal Opportunities Policy
- Employee Grievance Resolution Policy
- Anti-Bribery & Corruption Policy
- Health & Safety Policies.

These policies not only contribute to the overall well-being and fair treatment of employees but also serve as safeguards against any potential Modern Slavery practices within IBS.

IBS takes a diligent approach to ensure that all employment contracts comply with the local laws and regulations applicable in each jurisdiction where the company operates. This commitment underscores IBS's dedication to uphold legal standards and promote responsible employment practices throughout its global operations.



By incorporating these robust policies, conducting reviews of these policies, and complying with local laws, IBS maintains a strong framework to prevent and detect any potential instances of Modern Slavery within its own operations. The company remains steadfast in its commitment to fostering a safe, ethical, and inclusive working environment for all employees.

### **Supplier Obligations and Adherence**

IBS has implemented a comprehensive procurement policy aimed at ensuring ethical practices throughout its supply chain. As part of this policy, a direct link to the company's code of conduct is required to be included on all purchase orders.

By mandating the inclusion of the code of conduct on purchase orders, IBS emphasises the importance of adhering to ethical guidelines and principles not only within its own operations but also among its suppliers and vendors. This proactive approach serves as a constant reminder of the company's commitment to conducting business in a responsible and transparent manner.

The inclusion of the code of conduct on purchase orders fosters a culture of accountability and integrity among IBS's supply chain partners. Suppliers and vendors are encouraged to familiarise themselves with the code of conduct and align their practices accordingly, ensuring that the entire procurement process aligns with ethical standards.

Moreover, this requirement demonstrates IBS's dedication to promoting responsible sourcing practices and mitigating the risks associated with unethical behaviours, such as Modern Slavery, human rights violations, and environmental harm. By making the code of conduct easily accessible to all stakeholders involved in the procurement process, IBS emphasises its commitment to fostering a sustainable and socially responsible supply chain.

Through this integrated approach, IBS strives to create a network of suppliers and vendors who share its values and adhere to the same high standards of ethical conduct. The link between the procurement policy and the code of conduct serves as a tangible manifestation of IBS's commitment to transparency, accountability, and promoting ethical business practices throughout its procurement activities.

## ASSESSING THE EFFECTIVENESS OF RISK MITIGATING ACTIONS

IBS assigns the Human Resources and Company Affairs Departments with the responsibility of regularly evaluating the effectiveness of the Whistle-blower policy, and the Code of Conduct, to ensure that both policies are working in practice within the IBS.

In addition, to ensure accountability, external auditors conduct annual audits, including SOX and SOC Audits, to assess the enforcement of the Code of Conduct and the whistle-blower policy. Compliance with the Code is monitored, any breaches are documented, and a quarterly report is submitted to the Audit Committee.

### Training

To ensure a high level of understanding of the risks of Modern Slavery and human trafficking in IBS' supply chains and business, IBS provides training to all staff on its policies and Code of Conduct when they commence their employment. Additionally, employees are able to access these policies on IBS's systems at any time.

## CONSULTATION PROCESS

The Code, which encompasses the Whistle-blowing Policy, establishes a framework to ensure comprehensive compliance by both IBS Software Europe and the third parties it collaborates with. This Code extends beyond IBS Software Europe Limited and encompasses all entities within the IBS group. Therefore, the Whistle-blower policy and Code of Conduct provide the same safeguards not only to IBS Software Europe Limited but also to its fully owned subsidiaries located in Japan, Germany, and China, as well as the branches operating in Italy, Netherlands, Australia, and France. These relevant companies were consulted in the development of this statement. The details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions intended to be taken to address these requirements were discussed. These protections continue to be extended and applied to third parties engaged by the branches and subsidiaries, maintaining appropriate measures to safeguard against the risks of Modern Slavery throughout the entire corporate group.

***This Modern Slavery Statement was approved by the Principal Governing Body of IBS Software Europe Limited and signed by Mrs T N Kanchana Chitra in their role of Secretary on 21.09.2023***

21.09.2023



DATE

Mrs. T N Kanchana Chitra

Secretary