

Slavery and human trafficking statement April 2026

Introduction

This statement sets out Ideagen's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. Within this statement, the terms 'Ideagen', 'company', 'business', 'we', 'us' and 'our' relate to Ideagen Limited and all its subsidiaries. This statement relates to actions and activities during the company's financial year, 1st May 2025 to 30th April 2026.

The company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Ideagen Limited carries on business in Australia through its Australian subsidiaries and accordingly is also a reporting entity under the Australian Modern Slavery Act 2018 (Cth). This statement therefore also constitutes the modern slavery statement of Ideagen Limited and the entities it owns or controls (including its Australian subsidiaries) for the purposes of section 16 of that Act.

Organisational structure, business and supply chain

Ideagen is a UK-headquartered, global technology company, with its main operational premises' spread throughout the UK, EU, US, Australia, Middle East, India and South East Asia.

Ideagen has over 18,500 customers, ranging from SMEs to large global corporations. Ideagen is a name trusted by organisations globally to deliver world-class, innovative software solutions in regulated or high-compliance industries such as aviation, financial services, life sciences, healthcare and manufacturing. Ideagen solutions and services help solve complex quality, health and safety, risk, audit and compliance challenges. Ideagen directly employs over 2,200 members of staff across its global operations.

We are serious about our brand because it's part of our identity and so is our commitment to corporate social responsibility. We believe transparency is the best way we can ensure that we are doing our best as an ethical corporate body. In that spirit, we have published our annual statement for slavery and human trafficking, made in compliance with section 54 of the Modern Slavery Act 2015 and section 16 of the Australian Modern Slavery Act 2018 (Cth), in which we explain how slavery and human trafficking can affect our business and the steps we are taking to ensure we prohibit it.

Relevant policies

Upon joining Ideagen, as part of their induction, all employees are required to undertake training relevant to slavery and human trafficking and all existing employees are requested to re-visit the same on an annual basis.

We also operate the following specific policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The company encourages all its workers, employees and contractors to report any concerns related to the direct activities or the supply chains of the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **General rules and code of conduct:** The company's Code of Conduct / Disciplinary Policy makes clear to employees the actions and behaviour expected of them when representing the company. Employees are asked to review and acknowledge the Code of Conduct / Disciplinary Policy annually. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier's policy and procedure:** The company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The company works with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. However, serious violations of the company's Business Code of Conduct will lead to the termination of the business relationship.
- **Recruitment policy:** We obtain references for all external candidates recruited at Ideagen. All new employees and in some cases prospective employees of Ideagen will need to evidence their right to work in the country where they reside and are employed. Each country has its own eligibility and legislation that governs this and Ideagen has a legal requirement to ensure we are fully compliant with these checks. To the extent that they are used, Ideagen uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Ideagen strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation for its employees globally as appropriate, and in many cases exceeds those minimums in relation to its employees.
- **Remuneration and benefits policy:** Ideagen employees are offered a competitive remuneration package and Ideagen provides a comprehensive range of benefits to its employees. Ideagen regularly conducts employee engagement surveys on an anonymous basis to give employees a voice on their individual employment, their department and the Company, as appropriate. Responses / comments provided in said surveys are actively reviewed by management accordingly.
- **Grievance policy:** Our Grievance policy encourages Ideagen employees to raise concerns about poor working practices.
- **Anti-Bribery and corruption policy:** Ideagen is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. The company will not tolerate any form of bribery by, or of, its employees, customers, suppliers or consultants or any person or body acting on its behalf.
- **Business code of conduct:** Ideagen's business code of conduct confirms what it expects of its customers and suppliers, not only in relation to human rights and modern slavery, but also anti-bribery, corruption and anti-money laundering.

Due diligence procedures

Ideagen undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of critical suppliers;
- Conducting supplier audits or assessments through the company's own staff which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our business code of conduct, including the termination of the business relationship; and
- Advising our new and existing suppliers of our commitment to combatting modern slavery within our organisation and our similar expectation from our suppliers to us.

Modern slavery risks

Given the nature of Ideagen's business as a software provider, with a workforce of skilled, salaried professional employees engaged on standard employment contracts in regulated jurisdictions, we assess the inherent risk of modern slavery in our own operations and those of the entities we own or control as low. Within our supply chain, we consider the categories of supplier carrying comparatively higher inherent modern slavery risk to be facilities management services (cleaning, security, catering), hardware and electronics manufacturing, recruitment agencies, and outsourced contractor services in higher-risk jurisdictions. To the best of our knowledge, we have not identified any actual instances of modern slavery within Ideagen or our supply chain during the reporting period.

Effectiveness

We assess the effectiveness of our actions to address modern slavery risks by reference to a number of indicators, including: completion rates of mandatory compliance training; the proportion of new suppliers subjected to modern slavery due diligence; the number of concerns raised through our whistleblowing channels and the outcome of any investigation; and the integration of acquired businesses into our policy framework. These indicators are reported to our senior leadership at least annually.

Consultation with owned and controlled entities

Ideagen operates under a single, group-wide policy framework approved by the Board of Ideagen Limited and applied across each entity that Ideagen Limited owns or controls. In preparing this statement, the Group Legal team consulted with senior leadership in each material operating subsidiary, including each Australian subsidiary, on operational and supply-chain matters within their respective entities and comments received were considered and reflected in the final statement as appropriate.

Next steps

We recognise and understand the importance of the Modern Slavery Act and are committed to reviewing and assessing the risks in our supply chain. Over the course of the coming financial year, we will continue to review

our supplier contracts and procurement processes to ensure continued compliance with the Modern Slavery Act.

Approval

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and section 16 of the Australian Modern Slavery Act 2018 (Cth) and constitutes our Slavery and Human Trafficking Statement for the company financial year ended 30th April 2026. This statement was approved by our Board of Directors and signed on its behalf by Ben Dorks, Chief Executive Officer.

A handwritten signature in black ink, appearing to read 'B Dorks', with a long horizontal stroke extending from the end.

Ben Dorks, Chief Executive Officer