

MODERN SLAVERY ACT STATEMENT

Financial Year ending 28 February 2023

Introduction

Commercial organisations in various countries must publish an annual modern slavery and human trafficking statement where they are supplying goods or services exceeding a stipulated annual turnover. The statement must set out what steps a commercial organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain and is implemented inter alia, in the UK under Section 54, Part 6 of the Modern Slavery Act 2015, in the US under California Transparency in Supply Chains Act 2010, in Italy under Legislative Decree no. 254, 30 December 2016, (transposition of EU Directive 2014/95/EU), in France under the Corporate Duty of Vigilance law; Amendments to the Law on Accounting PZE No. 51 (transposition of EU Directive 2014/95/EU), in India Bonded Labour Abolition Act 1976 and in Australia under the Modern Slavery Act 2018.

Advanced Computer Software Group Limited is a private company limited by shares and incorporated in England and Wales. It is the parent company of a wider group of companies (“Advanced Group”) and has subsidiary companies throughout the world including amongst others US, European Union (EU), India and Australia.

As a part of the core values of the Advanced Group, all companies in the Advanced Group are committed to doing business in the right way and staying true to our value of ‘Doing the Right Thing’.

As a predominantly software orientated group of companies, we do not carry the same high level slavery risk as companies operating in the retail or manufacturing sectors, however, this statement covers those areas within our business supply chain which may present a potential slavery risk. We are committed to understanding the modern slavery risks and to ensuring there is no modern-day slavery in our business and supply chains. Our business largely uses professionally qualified people employed directly by the Advanced Group. Our people policies ensure fair treatment of our people around the world. We would like to state that there were no instances of slavery or human trafficking concerns raised to us during the financial year under review.

Advanced – Organisational Structure and Background

We provide enterprise and market-focused solutions that allow our customers to reimagine what is possible, innovate in their sectors and improve the lives of millions of people worldwide. Advanced Group’s activities can be broken down into 8 key sectors, which are:

- Application Modernisation
- Education
- Health and Care
- Human Capital Management
- Legal
- Managed Services
- Private Sector
- Public Sector

Advanced – Our Business and Supply Chain Risks

The Advanced Group takes a zero-tolerance stance in relation to the use of slavery or human trafficking in its direct supply chain.

Given the nature of the Advanced Group’s business model, we believe the risk of modern slavery in our supply chain is low compared to businesses operating in other sectors such as manufacturing and retail. We have not identified any instances of modern slavery occurring in our supply chain. However, we recognise that there is no room for complacency and will continue to work to enhance our policies and procedures and measure awareness within our business. All our spend commitments are made using written contracts and we do not pay cash for services. Our major suppliers are large multinational companies who have their own ethical standards of behaviour in place.

Advanced – Our Policies, Due Diligence and Effectiveness

Our relationship with our employees starts at the hiring stage, and at the Advanced Group, we operate a fair and in-depth recruitment selection process for all of our hiring decisions. This selection process, where it is permissible by the local laws and the recruitment policy includes obtaining documented proof of the individual’s right to work in the country in which they are to be employed. We always check to ensure everyone employed is 16 and above and pay colleagues at least the minimum wage rate applicable in the geographical location in which the individual works. We also pay great importance on investing in our employees’ development, including providing them with the knowledge and tools they need for them to do business the right way in line with our organisational values. We aim to ensure that everyone is treated fairly throughout their time with us, providing them with all of the employee rights and benefits that they are entitled to by law as a statutory minimal, many of which are enhanced for example wellbeing initiatives to support our employee’s physical and mental wellbeing and lifestyle choices.

Our Staff Code of Conduct provides unambiguous guidance for all colleagues on how we do the right thing and sets clear expectations across the Advanced Group for compliance with ethical standards including in relation to modern slavery concerns Our supply chains are based for the most part in the UK and EU, but are growing worldwide and include distributors of 3rd party products (hardware, licensing, and infrastructure), suppliers of indirect services such as professional services, and resellers.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, our due diligence includes:

- Checks to determine the financial stability of the supplier
- Checks on compliance with regulations such as ISO9001
- Confirmation of an anti-corruption policy
- Confirmation of a business continuity plan

Our due diligence is designed to: 1) establish and assess areas of potential risk in our business and supply chains, 2) monitor potential risk areas in our business and supply chains, 3) reduce the risk of slavery and human trafficking occurring in our business and supply chains and 4) provide adequate protection for whistleblowers.

In order to monitor and review the checks and investigations conducted, Advanced is:

- Rolling out its supplier policies to all subsidiaries worldwide.
- Assessing the risk for all suppliers and all new suppliers and certify that they have taken the appropriate steps within their business to eradicate modern slavery in their organisation and in their supply chain.
- Notifying all current suppliers of our expectations around the prohibition of modern slavery.
- Including appropriate measures in our due diligence processes for sourcing suppliers.

We have a supplier code of conduct which has been communicated to our existing supplier community to remind them of our ethos and what we expect from those we do business with. It also serves as a tool to set the right standard with any new suppliers going forward. Each supplier is expected to commit to this code and adhere to it. The code forms part of any supplier relationship with the Advanced Group going forward, and the UK subsidiaries of the Advanced Group will not deal with suppliers who do not commit to the code or breach it. The UK subsidiaries of the Advanced Group have reviewed its standard supplier terms and conditions – this references the code; it is included in audit provisions and clearly identifies that code violations are grounds for immediate termination.

The Advanced Group's key measures for FY22/23 were:

- Percentage of completed training within our Procurement and Talent teams
- Percentage of High or Medium risk suppliers that have published a Modern Slavery statement or policy in line with their obligations under s.54 Modern Slavery Act 2015

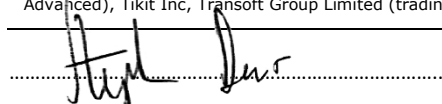
Advanced – Training

The Advanced Group maintains policies and procedures within its Human Resources function which deal with matters such as treating employees fairly, protecting human rights such as elimination of discrimination. All new starters are provided with full on-boarding including training on Modern Slavery (Modern Slavery UK/EU). Refresher training is available to all staff at any time via the Advanced Thinking Online platform to emphasise the importance of integrity in the workplace.

As with any company policy, disciplinary procedures are included which reflect the process in the event of any violation of legislation or the Advanced Group's policies in relation to it.

This statement covers Advanced Computer Software Group Limited (trading as Advanced) and the following trading subsidiaries (up to the FYE 2023) that are included within the scope of this statement:

Advanced Computer Software Group Limited, Advanced Application Modernisation Inc., Advanced Business Software and Solutions Limited (trading as Advanced), Advanced Business & Healthcare Solutions India Private Ltd (trading as Advanced), Advanced Business Software and Solutions Pte Ltd (trading as Advanced), Advanced 365 Limited (trading as Advanced), Advanced Health and Care Limited (trading as Advanced), Advanced Legal Solutions Limited (trading as Advanced), Advanced Legal Solutions Inc. (trading as Advanced), Advanced Ticketing Limited (trading as Advanced), Advance Systems Access Control Solutions Limited, Advance Systems International Limited, BKSB Limited, BluePhoenix I-TER SRL, CareDirector USA LLC, Careworks Limited, Careworks Technology Holding Limited (trading as Advanced), Cobaltside Limited, Careworks UK Limited, Certainty The National Will Register Limited, Clear Review Limited, Clear Review Inc, Cloud Trade Technologies Limited, Cloud Trade Inc, Compass Computer Consultants Limited (trading as Advanced), Computer Software Group Limited (trading as Advanced), ConsultCRM Limited (trading as Advanced), Decision Time Limited, Iosec Limited (trading as Iosec), Keyword Logic Limited, Kirona France SARL, Kirona Solutions Limited (trading as Advanced), Mitrefinch Limited (trading as Advanced), Mitrefinch (Australia) Pty Ltd, Mitrefinch Inc., Mitrefinch LLC, Mitrefinch US Holdings Inc., Modsys International Limited, Modern Systems LM Italy SRL, Modern Systems Corporation, Modsys - Modernization Services SRL, MS Modernization Services Inc. MS Modernisation Services UK Limited, OneAdvanced, Inc. (trading as Advanced), OPSIS Limited (trading as Advanced) OPSIS Practice Management Solutions Limited (trading as Advanced), Oyez Professional Services Limited, P.C.T.I. Solutions Limited, Pellcomp Software Limited, Science Warehouse Limited (trading as Advanced), Single Cell Mobile Consulting Pty Limited (t/a Portt), Smart Apprentices Limited, SWL Australia Pty Ltd, The National Will Register Limited, Tikit Limited (trading as Advanced), Tikit Inc, Transoft Group Limited (trading as Advanced), Trinity Software Limited, V1 Limited (trading as V1).



Stephen Dews
Chief Financial Officer
Advanced Computer Software Group Limited

This statement was approved by the Advanced board of directors on 22.08.23 and signed by Stephen Dews for Advanced Computer Software Group Limited on 22.08.23.