

1. Introduction

We strive to conduct our business responsibly, transparently, and in accordance with the highest ethical standards. This means we always strive to conduct our operations in strict compliance with all applicable laws and regulations. We are committed to fully implementing a robust approach to preventing slavery and human trafficking in all areas of our operations.

In this statement, we describe our business and supply chain, our policies and practices, and our plans for continuous improvement.

2. Overview of our business and supply chain

Softline Group is a leading provider of solutions and services in digital transformation and information security. Headquartered in Moscow, the Softline Group enables, simplifies, and accelerates the digital transformation of its clients' businesses, connecting over 106,000 organizations across all industries with over 5,000 best-in-class IT providers, as well as providing its own services and solutions.

Our IT solutions and services are provided across three business lines:

- Software and cloud solutions, including (i) software solutions, which include both traditional licensing agreements and subscriptions for a full range of software products from many major software developers; and (ii) cloud solutions, which include a diverse portfolio of cloud computing services based on technologies and services from leading developers, as well as our own multi-cloud management platform;
- Hardware that offers the necessary capabilities to deliver and deploy a full range of desktop, data center, and network infrastructure solutions using hardware offerings from leading vendors and suppliers; and
- Services including cybersecurity, innovative workplaces, IT infrastructure, digital solutions, software asset management and our own public cloud services, as well as next-generation services such as software and application development and design.

3. Our Code and Policies

Softline Group of Companies considers human rights an essential component of our business. We reject all forms of forced or child labor, as well as modern slavery and human trafficking. This position extends not only to the Softline Group of Companies but also to those who work on our behalf.

We believe that corporate governance practices are essential to creating and preserving value for our shareholders and other stakeholders. This includes a prudent approach to corporate governance aimed at complying with all applicable laws, rules, regulations, and policies, as well as upholding our corporate values and business principles. Our corporate governance is underpinned by a robust Code of Corporate Ethics and Compliance (the "Code"), which sets out key principles and rules to help the Board of Directors and employees fulfill their responsibilities and serve the interests of the Softline Group of Companies, its shareholders, and society. We strive for mutually beneficial relationships with suppliers based on shared values. Our Supplier Code of Conduct clearly sets out the requirements for suppliers, from whom we expect the same high level of ethical behavior.

We encourage reporting of any instances of unethical conduct through your immediate supervisor and the Ethics and Compliance Team.

4. Risk assessment, prevention and mitigation

Softline Group of Companies utilizes an enterprise risk management system focused on continuous improvement, enabling the business to achieve its strategic objectives, comply with regulatory requirements, and protect its reputation. This enables the Softline Group of Companies to (i) identify potential incidents related to modern slavery that may impact the organization; (ii) manage priority risks related to modern slavery; and (iii) provide assurance regarding the management of these risks within the internal compliance control system.

As part of our enterprise risk management framework, we will develop risk profiling to help prioritize our efforts based on geography and the types of products or services they provide. This is done to assess whether they pose a higher risk. We will then assess high-risk suppliers in more detail to better understand the risks and the mitigation measures we will need to take.

5. Due diligence procedures for our business partners

We have clearly outlined the requirements and recommendations for the due diligence we conduct on our partners in our Business Partner Due Diligence Policy. The depth and scope of due diligence is determined by risk analysis and other factors. We only enter into business relationships if we have the capacity to conduct appropriate due diligence. Our multi-stage due diligence includes legal, financial, and security audits, assessing issues such as current or past litigation, financial statements, and senior management information, as well as the presence of enforcement proceedings, criminal and administrative cases, or reputational issues. These are then assessed by our Ethics and Compliance Team to assess our level of confidence in our partners.

6. Checking eligibility during the recruitment process

We want to ensure that modern slavery and human trafficking are prevented in our business from the very beginning of the recruitment process, and therefore our recruitment policy is aligned with our principles outlined in our Code. When hiring employees, we comply with applicable age regulations and take into account restrictions related to the participation of minors in particularly hazardous work and facilities. Furthermore, all levels of management and HR personnel must ensure that employees have chosen to work for us of their own free will and are free to leave at any time in accordance with applicable law. We expect that once an individual joins us, they will meet the standards outlined in our Code.

7. Training and capacity building

When a new employee joins the Softline Group , they must complete training on our Code, as well as other mandatory compliance training. A measure of the effectiveness of this training is that in 2021, we had a 98% completion rate for employee compliance training. This mandatory compliance training also includes guidance on human rights and children's rights. Going forward, we will strive to improve this training and focus on helping our

employees understand and recognize the modern risks of slavery and human trafficking, as well as how they can report any violations.

In addition, we are committed to ensuring that employees receive training in accordance with the requirements of our partners and suppliers, where applicable, including modules on human rights and fair labor practices.

8. Scope

Softline Group's statement on modern slavery, which was approved in February 2023.

V. Lavrov,
General Director of the Softline Group of Companies