

Sii Warsaw Team



Anti Forced-Labour and Modern Slavery Policy

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1. Purpose and General Commitment

Sii conducts its business activities in full compliance with applicable laws, international standards, and ethical principles, while respecting human rights and fundamental freedoms. Respect for human dignity and Workers' rights constitutes a core element of Sii's corporate culture and values and underpins the Company's approach to responsible business conduct. In line with these principles, Sii operates in accordance with the highest ethical standards and does not tolerate any form of forced labor, exploitation, discrimination, or abuse. The Company is committed to providing a safe, inclusive, and dignified working environment for all Workers, both in Poland and in all countries where it conducts business activities.

This commitment applies to all aspects of Sii's operations, including the recruitment, employment, and management of all Workers. Sii ensures that every Worker, regardless of nationality, origin, or place of work, is treated with equal respect and afforded the same rights and protections.

This Policy is based on Sii's values and aligned with internationally recognized human rights, labor, and responsible business conduct standards, including in particular:

- Universal Declaration of Human Rights
- International Labour Organization Conventions, including those concerning the prohibition of child labor and forced labor
- UN Global Compact Principles
- Organisation for Economic Co-operation and Development Principles, particularly those regarding the fight against corruption
- Labor Code provisions applicable in the countries where we operate
- Polish, EU and local law provisions, as well as case law.

2. Sii's Structure and Business Operations

Sii is a leading provider of technology consulting, digital transformation, engineering, and business services in Poland. Through its comprehensive 360° offering, the Company delivers services including web and mobile application development, software testing, e-commerce solutions, cybersecurity, embedded systems, and IT infrastructure services. With a team of 7 500+ specialists, located in 14 offices in major Polish cities and 3 offices abroad in Sweden, Ukraine, and India (Pune), we combine local expertise with global delivery capabilities. Workers perform their duties either in Sii offices or, if applicable, are delegated to work in other countries in accordance with internal regulations and applicable legal requirements.

Sii is a service-based company and does not source, use, or process raw materials or conflict minerals in its operations. All activities are limited to technology and consulting services, with no involvement in manufacturing or mining, ensuring that the Company's operations pose no risk related to conflict minerals or associated supply chains.

3. Supply Chain and Business Partners

Sii cooperates with suppliers that adhere to the principles of responsible business conduct: operate legally, comply with applicable laws, respect Workers' and consumers' rights, ensure safe working conditions, equal treatment, and fair pay, and act honestly and ethically.

As part of the procurement process, our classified suppliers are required to accept Sii's Global Terms and Conditions for Purchase and to comply with the Supplier Social Responsibility Code of Conduct. These documents impose binding obligations relating to labor standards, human rights, ethical practices, environmental sustainability and must be formally accepted by authorized representatives of the supplier.

In addition classified suppliers are periodically required to complete a Self-Assessment Questionnaire confirming their commitment to conducting business in an ethical, lawful, and sustainable manner, and they are obligated to implement corrective actions for any identified non-conformities.

4. Internal Policies and Governance Framework

Sii has implemented policies and procedures to prevent forced labor and human trafficking, developed in accordance with internationally recognized labor and human rights standards and established global business best practices. These policies apply to all Sii entities and shall be complied with by all subsidiaries without exception. They set minimum compliance requirements, clearly define expected behavior, and ensure that Sii's values and obligations are applied consistently across the organization. All procedures are written in clear language that Workers can understand.

Sii's specific policies include:

Ethical Charter: defines Sii's fundamental principles and values, including respect for human rights, prohibition of forced labor, and commitment to ethical business practices. It serves as the foundation for our ethical business decisions and behaviors, ensuring integrity, transparency, and accountability across operations.

Code of Conduct: provides clear guidelines for Workers behavior and decision-making, promoting honesty, fairness, and compliance with applicable laws and regulations. The Code explicitly prohibits all forms of forced labor, human trafficking, and discrimination, reinforcing Sii's commitment to a safe, inclusive, and respectful workplace where all Workers can reach their full potential. It also affirms Workers' rights to freedom of association ensuring they can engage in collective representation in accordance with applicable laws.

Supplier Social Responsibility Code: outlines mandatory requirements for suppliers regarding labor standards, human rights, ethical practices, and environmental sustainability. It prohibits forced, bonded, or indentured labor, child labor, and any restrictions on Workers' freedom of movement. Suppliers must implement management systems to identify and mitigate risks of forced labor and ensure compliance throughout their supply chains.

Global Terms and Conditions for Purchase: establish contractual obligations for suppliers, including adherence to ethical standards and human rights principles. These terms strictly forbid engagement with entities involved in forced labor, slavery, or human trafficking, and require suppliers to maintain compliance as a condition of doing business with Sii.

Health and Safety Policy: The Occupational Health and Safety Policy is aligned with the ISO 45001 standard and sets out Sii's commitment to providing safe, healthy, and ergonomic working conditions while respecting the rights and obligations of both the employer and Workers.

The Policy includes proactive measures, internal audits and management reviews, supporting regulatory compliance and continuous improvement, to monitor workplace conditions, ensure legal compliance, and conduct ongoing occupational risk assessments to prevent workplace accidents and reduce health and safety risks.

Alert Platform: is a publicly accessible for Workers and all stakeholders, multilingual ethics and business conduct reporting mechanism that enables both named and anonymous reporting of suspected unlawful or unethical conduct and guarantees no retaliatory measures will be taken. The reporting channel is available globally 24/7. Each report is processed according to the timelines defined in the internal procedure *"Reporting violations of the law and undertaking subsequent actions"*. All reports are tracked until closure to ensure that corrective actions are implemented to address the identified non-conformities.

Procedures available internally:

Recruitment Department – Business Rules: governs recruitment practices at Sii, ensuring transparency, fairness, and voluntary employment. All hiring decisions are based solely on qualifications and competencies, with zero tolerance for discrimination based on religion, race, ethnicity, gender, age, nationality, disability, sexual orientation, marital status, or compensation history. The policy also prohibits charging fees to candidates and includes mechanisms for monitoring compliance through candidate satisfaction surveys.

Workplace regulations: ensures that working conditions comply with all applicable local labor laws and regulations. These procedures cover key employment aspects, including working hours, overtime, wages, leave and absence entitlements, disciplinary measures, employment contracts and Health and Safety regulations. They also define transparent methods for recording working time, calculating and paying salaries, and managing Workers benefits. Furthermore, these procedures incorporate mechanisms to prevent any form of coercion or exploitation, guaranteeing fair treatment and voluntary employment. Compliance with these standards is mandatory for all Sii entities and is regularly monitored to uphold legal and ethical obligations.

Employment of juvenile Workers: regulates the employment of juvenile Workers in accordance with legal requirements and international labor standards. It defines eligibility criteria, protective measures, and employment modes. The procedure ensures that juvenile Workers are safeguarded against exploitation and that their health, safety, and education are prioritized.

5. Protection of Migrant Workers

The above-mentioned policies and procedures ensure safe working conditions and equal treatment for all Workers, including those particularly vulnerable to forced labor, such as migrant Workers. For the purposes of this Policy, a migrant or foreign Worker is understood as a person who migrates from one territory or country to another to seek employment.

In order to ensure effective protection, Sii explicitly defines and prohibits certain practices throughout its entire value chain, as set out below.

6. Prohibited Practices and Workers' Rights

6.1 Prohibition of Forced and Slave Labor

Sii strictly prohibits all forms of forced, compulsory, or slave labor, as well as human trafficking and modern slavery. Workers are never required to pay recruitment fees or provide financial deposits, and their identity documents are always in their possession. Employment is voluntary, and Workers are free to leave at any time. Recruitment processes are conducted only by Sii's recruitment team and Sii does not currently use any third-party recruitment agencies or intermediaries. All the process is transparent, conducted without force, and in a language understandable to the candidate, ensuring fair treatment and respect for every individual's rights.

6.2 Voluntary Employment and Freedom to Terminate Employment

All employment at Sii is voluntary. Workers are fully informed of their remuneration and all its components before starting employment, and these details are clearly specified in their contracts.

Workers have the right to freely accept or terminate their employment in accordance with applicable law and contractual provisions, with notice periods that comply with local labor regulations and do not impose undue restrictions. No penalties are imposed solely for ending employment. Contracts are provided in a language understandable to the Worker, and disciplinary measures are applied strictly in line with local labor law.

6.3 Prohibition of Child Labor

Sii does not employ persons below the minimum legal working age or under 18 years of age, whichever threshold is higher. The Company does not cooperate with entities that engage in child labor and takes immediate corrective action if such practices are identified within its supply chain.

6.4 Equal Treatment and Non-Discrimination

Sii ensures equal treatment of all Workers and prohibits discrimination based on gender, age, race, skin color, ethnic or national origin; religion, philosophical or political beliefs; sexual

orientation or gender identity; marital status or family situation; disability or health condition; trade union membership; any other characteristic protected by law.

All decisions regarding employment and Worker's development are based solely on qualifications, competencies, and performance. The Company ensures equal pay for equal work based on salary grid and promotes an inclusive working environment that values diversity.

Workers are obliged to behave in a manner that does not violate the dignity of other employees. Undesirable sexual or gender-related behavior, including mobbing or molestation, is prohibited.

6.5 Freedom from Harassment and Violence

Sii does not tolerate harassment, intimidation, or physical or psychological violence. Cases of such behaviours may be reported to Ethics Committee, all reported cases are treated seriously and investigated without delay.

6.6 Decent Working Conditions

Sii ensures fair remuneration, compliance with working time regulations, voluntary and compensated overtime, and respect for rest, leave and absences entitlements. Work arrangements may be office-based, remote, or hybrid, depending on operational needs, and Workers are provided with appropriate tools and support. Workers are not permitted to reside in Sii offices.

The Company's OHS Policy ensures safe and hygienic working conditions through regular training, risk prevention measures, and ergonomic workplace design.

6.7 Privacy and Personal Data Protection

Sii processes personal data in accordance with GDPR and other applicable data protection laws. Transparency, confidentiality, and respect for Workers' privacy are ensured, and Workers have the right to access and correct their personal data.

6.8 Education and Training

All Workers receive training on corporate social responsibility and human rights during onboarding. Refresher training and knowledge updates are provided yearly.