



PHOTON®

MODERN SLAVERY STATEMENT



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1. Purpose

Modern Slavery in Photon covers harassment through forced and compulsory labor and human trafficking in the supply chains of businesses. We are committed to upholding human rights and the steps we have undertaken to ensure that slavery and human trafficking do not operate within our business or our supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or any of our supply chains across the globe. Photon recognizes its responsibility to have a robust approach to all forms of slavery and human trafficking across its business. We are committed to transparency in our own business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act.



2. Business and Supply Chain

Photon is a leading global provider of software product development and digital platform engineering solutions. With over 20 years of experience in the information technology industry, Photon serves our customers in more than 50 countries across Europe, North and South America, and Asia.

We do not have suppliers that are material to our business, except for the purchase of equipment or licenses, which we do with top companies that undergo a due diligence process before formalizing the engagement, which is managed by the Legal Compliance team. All suppliers must undergo this process, regardless of size, country, type of services or goods provided. Additionally, all of our agreements with suppliers include written representations concerning compliance with applicable law, including, in particular, applicable labor law.



3. Prevention of Modern Slavery

Photon continues to comply with all laws prohibiting forced labor and slavery in our own integral workforce and is committed to upholding the human rights of workers as understood by the international community. Photon operates several policies that mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations. These policies are regularly reviewed and updated in line with best practices to ensure their continued effectiveness.

We uphold human rights in all of our global operations, in line with the United Nations Global Compact and the principles set out by the International Labor Organization. We comply with all applicable local labor regulations. At Photon, we are entitled to fair wages and hours consistent with local laws and to work in an environment free from discrimination.

Photon also does not make use of child labor (i.e., a person under the minimum age provisions of applicable laws and regulations) or forced labor (i.e., prison labor, indentured labor, bonded labor, military labor, slave labor), does not condone any form of human trafficking and will not work with third parties who do so.

We take special care of our employees when they are relocated to another country to protect their welfare and integrity. To generate inclusion, promote cultural diversity, and take care of the welfare and integrity of our employees and their families, we have set up a Relocation Policy. In addition to analyzing business opportunities to promote intra-company diversity, we also listen carefully to the needs and wants of our employees to ensure a better quality of life and multicultural experiences in other geographies.

4. Risk of Modern Slavery

Practices in our operations and Supply Chains

Photon is in the digital services and consulting industry and its activities involve low risk of Modern Slavery (human trafficking, slavery, forced labor, servitude, etc.). Our Code of Conduct & Ethics, Policies and Procedures further addresses the risk of Modern Slavery. As regards our supply chain, our engagement process with them and the Codes governing their appointment ensure that the risk of Modern Slavery is minimal. Modern Slavery is a complex challenge that requires ongoing, evolving, and continually improving efforts. We will continue to review our internal processes to ensure that our obligations under the Modern Slavery legislation are met.

We use the following key performance indicators to help us sustain our efforts and measure the effectiveness of the steps undertaken to remove modern slavery and human trafficking from our supply chains.

- Working with our suppliers to acknowledge and socialize the Supplier Code of Conduct
- Providing information on their rights to support staff on our campuses in India including those relating to sexual harassment.
- Periodic audits by our internal audit team, along with remedial action.

Reviewing issues raised through our grievance redressal mechanisms and initiating corrective action. We will continue to identify ways to improve employee and supplier awareness of Photon's commitment to respect human rights and efforts to prevent modern slavery and human trafficking.

5. Moving Forward

This document represents our Fiscal Year 2023 statement under the Modern Slavery Act to account for our efforts to mitigate all types of modern slavery in our business or supply chain. We understand modern slavery is a very complex issue that cannot be addressed in the short term. We are devoted to tackling all types of modern slavery that may be present in our business and product chain, to protect our workers and all vulnerable groups, and to take care of the Legal Department's Confidential Information about the environment. We are constantly working on improvements to our internal processes to ensure that we efficiently work towards making the work a better place.

