

# Modern Slavery Statement

## About this policy

The Board of Seattle Holdings Limited and the group of companies within (collectively, “Orbus Software” or “We”) feel passionately that we must act ethically and transparently in every situation and consequently have set out the steps that we have taken, and are continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero-tolerance approach to any form of modern slavery.

## 1. Our Business

Orbus Software provides cloud software which enables our customers to architect their digital future by solving real challenges facing business and technology leadership across the organization. We provide customers with a strategic decision-making platform with specialist tooling for key transformational needs - including Enterprise Architecture, Application Portfolio Management, Business Process Modelling and Cybersecurity & Risk Management.

## 2. Our High-Risk Areas

We do not believe we have any high-risk areas relating to modern slavery or people trafficking. All our permanent and temporary staff members and contractors are professional people who have been recruited through open channels and thoroughly vetted and our suppliers are similar, professional, organisations.

## 3. Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- i. **Modern slavery policy and statement** (this document) - This policy sets out our stance on modern slavery.
- ii. **Talent acquisition** - We operate a robust recruitment policy, including conducting eligibility to work in the UK and checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- iii. **Code of ethics** - The purpose of this policy is to establish a culture of openness, trust and integrity in our business practices. We care as much about how results are achieved as we care about the results themselves. This policy can be found in the Orbus Software Employee Handbook.
- iv. **Whistle-blower policy** - We will protect any individual who makes us aware of an infraction of any company policy. This policy can be found in The Orbus Software Employee Handbook.
- v. **Equal opportunities policy** - The purpose of this policy is to promote equal treatment of all employees and potential employees; prevent, reduce and stop all forms of unlawful discrimination; and to ensure that all recruitment, promotions, transfers, training, development assessment, benefits, pay, terms and conditions of employment, redundancy and dismissals are

determined on the basis of capability, qualifications, experience, skills and productivity rather than unlawful criteria. This policy can be found in Orbus Software Employee People Handbook.

**4. Our Suppliers**

Orbus Software works with myriad of suppliers, big and small.

We ensure all suppliers complete a due diligence form, which request a copy of the supplier's modern slavery policy. If they do not have one, the form asks other questions to ensure compliance. We are also able to search the [Modern Slavery Registry](#) or other [online databases](#) if we need to investigate further.

Additionally, we have a confidential online anonymous form available through our intranet that any employee can access to identify any companies or practices that give cause for concern.

**5. Training**

We conduct online training for all employees involved in procurement/buying so that they learn and understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This is part of on-boarding for new starters, and we conduct an annual audit to ensure current employees have completed the appropriate training.

**6. Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law-enforcement agencies to indicate that modern slavery practices have been identified.

We will annually review our policy and procedures to ensure they continue to be effective. The outcome of this report will be given to the board to review



Andre Nguyen

Chief Legal Officer

**Issues and Updates**

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