

## STATEMENT ON MODERN SLAVERY 2025

### Our Business

Nagarro is a global digital engineering leader with a full-service offering. Nagarro specializes in “change the business” technology services, including digital product engineering, e-commerce and customer experience services, Artificial Intelligence and Machine Learning capabilities, cloud and IoT solutions, and consulting on next-generation ERP. The company’s core values apply globally. The core values spell “CARING”: Client-centric, Agile, Responsible, Intelligent, Nonhierarchical and Global. We design our processes to promote our core values. Our hiring standards are high and unbending. We mostly have no private offices for management, and no special travel or parking perks by seniority. Most company key functions operate globally, so that we act as a truly international company. Nagarro aims to be a truly global company. True to our mission “to make distance and difference irrelevant between intelligent people”, we have offices in 36 countries and roughly a dozen nationalities in senior management. This diversity stands in contrast with that of many peers. Nagarro has been in existence since 1996 and became an independent listed publicly traded company in December 2020 by the German Transformation Act.

ATCS Canada Inc is the primary contracting entity for Nagarro’s Canada business though it often utilizes the services of its affiliates through service arrangements from around the globe. Most of our colleagues in the Canada are working as per client requirements.

Modern slavery is exploitation of other people for personal or commercial gain and circumscribes slavery, forced labor and human trafficking. Like any other critical topics like Discrimination, Sexual Harassment or Conflict of Interest, Nagarro has a zero-tolerance approach to any form of modern slavery and is committed to ensuring effective systems through Nagarro’s ethics and legal compliance programs running across business.

### Risk Analysis

Nagarro's commitment to doing business ethically and with legal compliance is the foundation for the company's global culture and spread, which is shaped by being empathetic, respectful, and non-judgmental. At the same time, it is an acronym for six other core values i.e., Client-centric, Agile, Responsible, Intelligent, Non-hierarchical, and Global (CARING). Such values are part of our organisation's DNA and reflect our unique culture. Our mission statement is 'To make distance irrelevant between intelligent people.'

Nagarro is an equal opportunity workplace. There shall be no discrimination against any person based on ethnicity, gender, marital status, pregnancy status, religious belief, sexual orientation, transgender identity or expression, age, world view, medical condition, disability, union affiliation or military veteran status. Nagarro is extremely strict regarding sexual harassment, defined as unwelcome sexual advances, visual, verbal, or physical conduct of a sexual nature.

Compared to other industries, the risk of bonded labour within our sphere of influence is rather minimal as an IT services company. Nonetheless, Nagarro remains watchful and proactive by developing extensive procedures and offering training to ensure that we neither deal with nor support suppliers implicated in modern slavery or forced labour practices.

Our annual risk assessment for Calendar Year 2025 identifies the following areas as carrying elevated risk. Technology hardware procurement carries a low-to-medium risk due to the well-documented use of child and forced labour in the extraction of cobalt, lithium, and tantalum in parts of sub-Saharan Africa and South-East Asia. IT staffing and subcontracting arrangements involving offshore personnel carry a low risk of debt bondage

or exploitation of migrant technology workers. Facilities and cleaning services in Canadian locations carry a low risk associated with underpayment or use of undocumented workers. Our direct professional workforce carries a low risk, given competitive compensation practices, strong compliance culture, and adherence to Canadian employment standards legislation. We assess our overall residual risk of forced labour or child labour occurring within our direct Canadian operations as low.

### **Policies**

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### **Training**

Nagarro provides mandatory employee awareness training to its employees on anti-slavery and anti-human trafficking, equipping them to identify and address such issues within the supply chain in compliance with applicable laws, including the Act.

We take the following steps to guarantee that human trafficking and slavery are not present in any aspect of our supply chains or business:

- Informing suppliers about our Supplier Code of Conduct during the onboarding process through formal agreements.
- Conducting periodic quizzes as part of ongoing training to reinforce awareness.
- Ensuring all wages paid are above the minimum wage requirements as stipulated by local laws.
- Providing mandatory onboarding training for all new employees on modern slavery, forced labour, child labour, and human trafficking.
- Delivering annual refresher training for all employees covering updates to the Act, Nagarro's policies, and practical case studies relevant to the technology sector.

### **Further Steps**

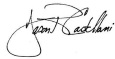
We reiterate our commitment to zero tolerance towards modern slavery after evaluating the effectiveness of the steps we took this year to combat slavery and human trafficking within our company. To guarantee continued compliance and advancement in this crucial area, we shall keep an eye on things and evaluate the results of our initiatives.

This statement is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c. 9, and serves as Nagarro's annual report for the calendar year ending December 31, 2025.

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*Changes to this Policy: This policy will be reviewed periodically, and changes as required will be made from time to time.*

For ATCS Canada Inc.



**Jason R. Castellani**

Director