

STATEMENT ON MODERN SLAVERY 2024

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.

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

Modern slavery is exploitation of other people for personal or commercial gain and circumscribes slavery, forced labour 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 organization’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.

As an IT service organization, the risk of bonded labor within our sphere of influence is relatively low compared to other industries. Nonetheless, Nagarro remains vigilant and proactive by implementing comprehensive policies and providing training to ensure that we neither engage with nor support suppliers involved in modern slavery practices.

Policies

Nagarro is dedicated to ensuring that all its global affiliates receive fair compensation and work reasonable hours in accordance with local laws, fostering a discrimination-free work environment. The company firmly opposes the use of child or forced labor and condemns any involvement in human trafficking. Nagarro is committed to not engaging with third parties that participate in such practices.

Aligned with its core values, Nagarro holds its suppliers to stringent standards, mandating adherence to a comprehensive code of conduct. Suppliers are required to thoroughly assess their business practices and supply chains to ensure compliance with the Modern Slavery Act, anti-human trafficking laws, and other human rights guidelines.

To foster transparency and address potential issues, Nagarro promotes the use of its whistleblower policy. A formal grievance redressal framework is in place, accessible to all stakeholders, including partners, contractors, and employees. This framework provides a confidential platform for raising concerns, safeguarded by a strong non-disclosure policy that protects whistleblowers' identities and interests. Reports related to modern slavery are taken with the utmost seriousness and are rigorously investigated by the company.

Training

Nagarro provides mandatory training sessions and workshops 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.

To ensure that slavery and human trafficking are not present in any part of our business or supply chains, we implement the following measures:

- 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.

Further steps

After reviewing the effectiveness of our measures taken this year to prevent slavery and human trafficking within our business, we reaffirm our commitment to zero tolerance towards modern slavery. We will continue to monitor and assess the impact of our actions to ensure ongoing compliance and improvement in this critical area.

This policy statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and serves as the slavery and human trafficking statement for Nagarro Software Limited for the year ending 2024.

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

For Nagarro Software Limited



Paul Kurt Haberfellner
Director