

## Anti-Modern Slavery and Human Trafficking Statement

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## 1. Purpose

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Qualitest Group during the financial year up to 31<sup>st</sup> March 2026 to prevent modern slavery and human trafficking within our business and supply chains.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business relationships.

## 2. Organisation structure, business and supply chains

Qualitest Group is a global provider of software testing and quality assurance services, supporting clients across a range of industries including financial services, technology, healthcare, and telecommunications. The organisation operates internationally, with key delivery locations in the United Kingdom, India, Europe, Israel, and the United States.

Our organisational structure comprises regional business units supported by centralised functions including Information Security, Quality & Compliance, Human Resources, Procurement, and Legal. Governance and oversight of ethical business practices, including modern slavery risk, are managed through these central functions, with accountability at senior management level.

Our supply chain primarily consists of professional services providers, technology and cloud service vendors, recruitment and background screening partners, and other operational support services. As a services-based organisation, our supply chain is generally considered lower risk compared to manufacturing; however, we recognise that risks may still arise, particularly in relation to labour practices within third-party providers and in certain geographic regions.

We are committed to maintaining a responsible and ethical supply chain. Suppliers are subject to risk-based due diligence processes, and we expect all partners to adhere to applicable laws and standards relating to human rights, labour practices, and modern slavery.

## 3. Policies and Responsibilities

We are committed to acting ethically and with integrity in all our business dealings. Qualitest has a central Compliance function which has responsibility for its compliance, with regards to the Modern Slavery requirements, Qualitest has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These include;

- **Anti-Slavery and Human Trafficking Policy** which is issued to all colleagues;
- **Supplier Security & Assessment Policy** which sets out internal requirements for on-boarding new suppliers and services;
- **Qualitest Code of Conduct** which is issued to all colleagues;
- **Whistleblowing Policy** which encourages staff to report concerns including any related to modern slavery/trafficking and child or forced labour;
- **Supplier Code of Conduct** which is issued to suppliers.

These policies are regularly reviewed and are accessible to all employees. They help to raise awareness and provide guidance on identifying and reporting concerns.

## 4. Risk Assessment and Due Diligence

Qualitest adopts a risk-based approach to identifying and assessing the potential for modern slavery and human trafficking within its operations and supply chains. Risk assessments consider a range of factors, including the geographic location of operations and suppliers, the nature of services provided, and the level of reliance on third-party labour.

Due diligence is conducted as part of our supplier onboarding and ongoing supplier management processes. This includes the use of structured supplier risk assessments, contractual due diligence, and evaluation of suppliers' policies and controls relating to labour practices, human rights, and ethical conduct. Where appropriate, suppliers are required to confirm compliance with applicable laws and our expectations regarding modern slavery and human trafficking.

Internal processes also support risk identification, including employee reporting mechanisms, whistleblowing channels, and oversight from central governance functions such as Quality & Compliance and Legal.

### 4.1. Actions taken to mitigate risks

To mitigate the risk of modern slavery within our business and supply chain, Qualitest has implemented a range of controls and procedures aligned with its broader governance and compliance framework.

All relevant suppliers are subject to a risk-based onboarding process, which includes completion of supplier risk assessment questionnaires and, where appropriate, enhanced due diligence for higher-risk engagements. Contracts with suppliers include provisions requiring compliance with applicable laws, including those relating to modern slavery, and adherence to ethical business practices.

Internally, Qualitest maintains policies and procedures that promote ethical conduct, including anti-bribery and corruption policies, whistleblowing mechanisms, and codes of conduct. These policies are communicated to employees and supported through training and awareness programmes.

We also maintain oversight through ongoing supplier monitoring, periodic reviews, and escalation processes where concerns are identified. Any suspected breaches of our standards or applicable legislation are subject to investigation and appropriate remedial action.

Qualitest is committed to continuous improvement in this area and will continue to enhance its risk assessment and due diligence processes to ensure that modern slavery risks are effectively identified, managed, and mitigated across its global operations.

## 5. Training

We provide training to relevant employees to help them understand the risks of modern slavery and human trafficking. This includes:

- Mandatory online training for all relevant employees on UK Modern Slavery Act;
- Awareness sessions on identifying signs of exploitation;
- Guidance on how to report concerns;
- Managerial training on procurement and ethical sourcing.

## 6. Key Performance Indicators

Qualitest have developed a process to continually measure the success and performance of our organisation by tracking key performance indicators (KPI's). A similar set of KPI's continues to be developed and applied to measure the effectiveness of our compliance with the Modern Slavery Act. KPIs to date include;

- Statistics relating to our supply chain risk and modern slavery training
- Volume of supplier risk reviews
- Number of higher risk suppliers independently audited
- Number of remedial actions agreed in respect of audit findings

We will continue to drive this programme forward, and as it matures, we will report further on progress in our next statement.

## 7. Continuous Improvement

Over the course of the next financial year, we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers, along with this we intend to;

- Enhance supply chain transparency through improved auditing processes
- Expand training to include more team members and suppliers
- Collaborate with industry groups and peers to share best practices

We have recently upgraded our training experience for all employees, for which Modern Slavery was in scope. This will enhance our firm's knowledge and understanding of the requirements under the Act and will ensure that we know how to identify areas of concerns and how to deal with them.

Signed: *Anna Garnham*

Chief People Officer