



# MODERN SLAVERY POLICY

## **Abstract**

**The document aims** to describe our code of conduct regarding slavery, servitude and forced or compulsory labour and about human trafficking.

**The intended beneficiaries:** This policy is addressed to our internal community, outside the company, and to other institutions and society.

Document Version History

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ABBREVIATIONS

ABBREVIATION	DEFINITION
MSP	Modern Slavery Policy

THE GOALS OF THE POLICY

[The Global Slavery Index 2023](#) reveals the number of people living in modern slavery has grown since 2018 against a backdrop of increasing and more complex conflicts, widespread environmental degradation, climate-induced migration, a global rollback of women’s rights, and the economic and social impacts of the COVID-19 pandemic. In 2023, the number of people living globally in modern slavery has increased to 50 million.

ASSIST Software is committed to preventing slavery, servitude, and forced labor in all its operations. We believe everyone has the right to work in a safe and ethical environment,

free from exploitation. Therefore, we are dedicated to ensuring that our practices comply with national and international laws and standards to prevent these acts.

Consequently, this **MSP** is:

- **Strategic:** it articulates the political commitment to the highest level.
- **Cross-sectional:** It affects all of the company's activities.
- **Realistic and feasible:** it responds to the diagnosis made for the policy design and accurately defines the responsibility, procedure, and resources for developing the proposed actions.
- **Accountable:** it guarantees that the information on the contents of the policy and the achievement of the goals reach the whole Company.
- **Participatory:** it is developed with the participation of the whole Company.
- **Flexible and ongoing:** it is a living document that allows changes based on tracking results.

From the point of view of the **target population**, the actions are addressed to the whole Company, other specific groups, or even outside the Company, other institutions, or society.

## LEGISLATION REGARDING MODERN SLAVERY

ASSIST Software adheres to relevant legislation stipulations regarding modern slavery. The purpose of the legislation is to prevent slavery, servitude, and forced or compulsory labor.

### INTERNATIONAL LEGISLATION (NON-EXHAUSTIVE LIST):

1. **Modern Slavery Act 2015, c. 30**
2. **European Convention on Human Rights**

## CONCEPTS OF SLAVERY, SERVITUDE, AND FORCED OR COMPULSORY LABOR

**Slavery** is:

- (i) **the status or condition of a person** over whom any or all the powers attaching to the right of ownership are exercised.

(2) **The slave trade** includes all acts involved in the capture, acquisition, or disposal of a person with the intent to reduce him to slavery; all acts involved in the acquisition of an enslaved person to sell or exchange him; all acts of disposal by sale or exchange of an enslaved person acquired to be sold or exchanged, and, in general, every act of trade or transport in enslaved people. (*United Nations*)

**Servitude** is a grave concern as it often happens behind closed doors, making it difficult to detect. It is a type of human trafficking that involves exploiting individuals in private residences under the guise of regular employment. However, when they are unable to leave of their own accord, it becomes an act of enslavement. This type of forced labor involves victims being on call 24/7 and expected to work in and around the employer's home daily.

**Forced or compulsory labor** is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. (*International Labour Organization*).

To effectively eradicate slavery in all its forms, the root causes of slavery, such as poverty, social exclusion, and all forms of discrimination, must be addressed.

## PREVENTION OF SLAVERY, SERVITUDE, AND FORCED OR COMPULSORY LABOUR

**Article 4 of the European Convention on Human Rights** is a crucial provision that prohibits slavery and forced labor. The provision states that every individual has the right to freedom, and no one should be held in slavery or servitude.

To prevent these forms of abuse of human freedom, we:

- Promote awareness and speak out against violations to create a safer and more inclusive society.
- Educate ourselves and the community on respecting individual rights and autonomy.
- Cultivate a culture of empathy, understanding, and solidarity to ensure everyone can live free of enslavement.

## ORGANIZATION AND RESOURCES FOR THE PREVENTION OF SLAVERY

**The responsibility** to prevent Slavery, servitude, and forced or compulsory labor applies to all Company activities and all Company community members, staff, and students in internships.

### Measures

The company has a solid commitment to preventing any form of slavery, servitude, and forced or compulsory labor. To fulfil this commitment, the company ensures that **specific**

**resources are allocated towards this goal.** These resources include **training programs, monitoring mechanisms,** and other measures to prevent these practices within the company's operations.

The Company has implemented **a comprehensive communication strategy** to uphold this commitment. This strategy involves the regular dissemination of information and training to all employees and stakeholders, as well as the establishment of clear policies and guidelines to prevent any form of exploitation or abuse.

All employees must be aware that they should raise a safeguarding concern immediately if they believe or suspect a breach of the company's policy has occurred or may occur in the future. Additionally, if problems or suspicions arise regarding modern slavery in any part of our business or within the supply chains of any third-party suppliers, reporting it to the **manager or Human Resources Manager** is crucial.

## DEDICATED RESOURCES

**The Human Resources Department** is accountable for creating, revising, and implementing the **MSP**. The department works closely with other relevant teams and stakeholders to ensure that the policy aligns with legal requirements and industry standards. Additionally, they oversee the communication of the policy to all employees, suppliers, and partners to guarantee a comprehensive understanding and compliance.


## AWARENESS TRAINING

**Awareness training** for preventing slavery, servitude, and forced or compulsory labor is included in ASSIST Software Annual Training Plan, section 1, Induction training, under the label: "Understanding general policies and procedures."

CONTACT PERSONS

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