

# Endava's Modern Slavery Statement FY2023/2024

This statement has been approved by the board of directors of Endava plc and is published as a joint statement in respect of Financial Year 2023/2024 for and on behalf of Endava plc and its affiliates, including the following reporting entities:

- Endava (UK) Ltd UK registered number 03919935;
- Endava Australia Pty Ltd ABN 90 642 165 740;
- Lexicon Digital Pty Ltd ATF Lexicon Digital Trust ABN 21839289552;
- Lexicon Consolidated Holdings Pty Ltd ABN 34 642 106 358;
- Mudbath & Co Pty Ltd ABN 28 601 780 929; and
- DEK Technologies Pty Ltd ABN 93 124 967 140.

(the "Reporting Endava Entities")

The purpose of this statement is to demonstrate that the Endava group has implemented practices to minimise the risk of modern slavery and human trafficking within its business and supply chains and to take appropriate action where instances of modern slavery and human trafficking are identified. This statement also sets out Endava's commitment to prevent modern slavery and human trafficking within its business and supply chains.

This statement is made in accordance with section 54 of the UK's Modern Slavery Act 2015 and section 14 of Australia's Modern Slavery Act 2018 (Cth), and has been prepared in consultation with Endava's Legal, HR and Compliance departments.

In this statement, "Endava" refers to Endava plc, its affiliates, the Reporting Endava Entities and the wider Endava group.

**John Cotterell** 

Chief Executive Officer, Endava plc

## Our business

Endava is a global next-generation technology services provider delivering IT strategy, digital solutions, software development and automation solutions. Endava is committed to delivering services to an excellent standard and supporting our clients from initial idea through production, to enable them to provide products and services to their clients and customers.

Endava plc is the parent entity of the Reporting Endava Entities and the wider Endava group. It has its head office in the United Kingdom and is listed on the New York Stock Exchange.

Endava provides implementation support and management to some of the world's leading companies in the payments; banking and asset and wealth management; insurance; technology; media and telecommunications; retail and consumer goods; healthcare; and mobility industries, helping them to evolve and transform their businesses. Endava has built a foundation of industry expertise, engineering excellence and nearshore delivery.

Endava is a global business, and we provide services through our local entities in the European Union (Austria, Bulgaria, Croatia, Denmark, Germany, Ireland, the Netherlands, Poland, Romania, Slovenia and Sweden), non-European Union countries (Bosnia & Herzegovina, Moldova, North Macedonia, Serbia, Switzerland and the United Kingdom), Latin America (Argentina, Colombia, Mexico and Uruguay), Asia-Pacific (Australia, India, Malaysia, Singapore and Vietnam), North America (Canada and the United States), and the Middle East (United Arab Emirates).



# Our stance on modern slavery

Endava has a zero-tolerance policy towards modern slavery and human trafficking and is committed to making sure that there is no human trafficking or modern slavery in any part of our business and our supply chain, in accordance with applicable law. We make diligent efforts to act ethically and with integrity in all our business relationships. Identifying and mitigating potential risks relating to modern slavery and human trafficking within our business and supply chain is a priority for Endava. It is vitally important to Endava that our people work voluntarily and in safe and appropriate environments, and we aim to adopt standards that meet or exceed local legal requirements.

If employees or suppliers have concerns about how we conduct our business (including our supply chain), they may take advantage of our Speak Up Safely Policy and tools where concerns and potential breaches can be reported in strict confidence. In particular, we have implemented the <a href="Speeki">Speeki</a> Al-powered platform and app which allow real-time two-way anonymous messaging between any concerned reporter and our Integrity team. Speeki also supports the process of declaring gifts and hospitality, as well as disclosing potential conflicts of interest. Alternatively, employees can report concerns directly to our Chief Integrity Officer.

Concerns raised in line with our Speak Up Safely Policy, whether through the Speeki platform or directly via our Chief Integrity Officer, are investigated thoroughly in line with Endava's Investigation Policy. If we determine that we are not meeting the high standards of ethics and integrity that we have set for ourselves, Endava will take appropriate corrective action to address these concerns. The matter may also be referred to governmental authorities that may investigate and initiate civil or criminal proceedings. Our Speak Up Safely and Investigation Policies protect employees who report their concerns in good faith from retaliation.

We call on the organisations and suppliers we engage with to influence their global supply chains by improving transparency and accountability.

# Employees

We have a long-standing policy not to use or accept the use of forced, bonded or involuntary prison labour or child labour in Endava's own operations. We do not demand deposits from our employees or hold onto our workers' identity papers. We only work with people who choose to work freely, and we respect the right to equal opportunity, freedom of association, and collective bargaining.

Our working practices respect and uphold key internationally recognised human rights, and we develop our employees through training and development programs. Our employees receive a competitive remuneration package which complies with and exceeds local minimum wage legislation. Employees are also issued an employment contract which complies with applicable laws and sets out the terms and conditions of their employment.

Endava is committed to acting ethically and with the highest levels of integrity in everything we do. Consistent with our values, everyone at Endava is expected to conduct themselves ethically, honestly and fairly with our customers, partners, suppliers, colleagues, and others we do business with. Our Code of Business Conduct and Ethics provides a comprehensive overview of Endava's values and how we embrace them in our daily interactions. It provides a framework for the way we conduct ourselves at work, with insight into how to operate ethically in a range of business situations.

We also require all our employees to undergo certain background screening when they join Endava.

# Supply chains

Endava is committed to its values of being thoughtful, open, adaptable, smart and trusted. We seek to implement these values in the way we operate with our staff, clients and suppliers and communities. As such, Endava expects all of its suppliers (including but not limited to our vendors, agents, contractors, consultants, intermediaries and third-party service providers) to adhere to these values. We do not accept the use of forced, bonded or involuntary prison labour or child labour in Endava's supply chains. Endava recognises the importance of procurement's role in managing social concerns. Endava endeavours to work with suppliers who are open and trusted, who respect and take seriously Endava's values, and who comply with applicable laws.

Our supply chains include a network of suppliers across different countries based on Endava's business needs. Suppliers within our supply chain mainly provide goods and services for use in an office and IT environment, including software licences, advertising and marketing services, professional services and subscriptions, benefit schemes for our employees, laptops and mobile devices, and office furniture.

We recognise that there is complexity in the supply chain that extends beyond our immediate suppliers and that the supply chain is likely to have a global reach.

Due to the nature of our business model, we believe that there is low risk of modern slavery, human trafficking, and child labour within our own business operations. Our supply chain has a greater risk in respect of forced labour, trafficking, and child labour than our own operations.

In order to identify and assess potential risks relating to modern slavery and human trafficking within our supply chain, we undertake a rigorous due diligence and screening process for suppliers with an expected annual spend greater than £100K or those suppliers that are based in jurisdictions that we regard as being medium to high risk (based on specific risks relating to anti-bribery and corruption, money laundering, human trafficking and modern slavery). This due diligence and screening process includes legal and ethics checks, as well as credit and sanctions checks. If a prospective supplier does not successfully complete this screening process, we will not do business with them.

Furthermore, in order to address and mitigate risks relating to modern slavery and human trafficking, we have several group policies and procedures in place that reflect our commitment to operating fairly, with integrity, ethically and responsibly as a business (including our Procurement Policy (which includes our Supplier Code of Conduct), Speak Up Safely Policy, Anti-Bribery

and Anti-Corruption Policy and Code of Business Conduct and Ethics). These policies underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business. We continuously review and update our policies, based on feedback regarding their effectiveness.

In addition, we ask new suppliers with an expected annual spend greater than £100K to sign up to Endava's Supplier Code of Conduct (available <u>here</u>). Under our Supplier Code of Conduct, all relevant suppliers are prohibited from using child labour, forced labour, slave labour or labour from any trafficked person. Under our Supplier Code of Conduct, these suppliers also commit to ensure that any work relationship with their workers is freely chosen and compliant with applicable laws (including in relation to pay, benefits and working hours) and to treat their workers with respect and dignity. It also requires these suppliers to provide fair remuneration to their workers, in line with applicable statutory minimum wage legislation.

Furthermore, as mentioned above, suppliers and their staff can report any concerns they might have through our Speeki Alpowered platform.

Suppliers must inform Endava if they have breached or suspect they have breached our Supplier Code of Conduct. If we become aware of potential breaches, our Supplier Code of Conduct also allows us to monitor suppliers' compliance with the Code.





## **Training**

Endava requires all its employees to undertake an annual training which covers Endava's purpose and values, diversity, inclusion & belonging, Endava's Code of Business Conduct & Ethics, anti-bribery, Endava's Share Dealing Code, data privacy and our Speak Up Safely policy. This training provides a guide on how to tackle workplace scenarios from an ethical perspective. It is mandatory for all employees and must be completed during the onboarding process and every year after that. If an employee does not complete this training, they will be reminded by their Line Manager to do so at the earliest opportunity. In the last financial year, 99% of active Endavans successfully completed this e-Learning course.

Furthermore, specific employee groups which are exposed to clients and suppliers are expected to attend additional workshops on integrity.



## Effectiveness in combating modern slavery and human trafficking

We regularly monitor risks of modern slavery or human trafficking within our operations or supply chains. Our policy is not to engage with any current or prospective suppliers who do not comply with the UK's Modern Slavery Act 2015, Australia's Modern Slavery Act 2018 or any other similar regulation under a different jurisdiction in which we operate.

In the last Financial Year, we did not discover any instances or risks of modern slavery or human trafficking within our supply chain (based on a review of those suppliers with an expected annual spend greater than £100K or those based in medium to high risk jurisdictions, as explained above). Furthermore, no concerns regarding modern slavery or human trafficking have been raised through Speeki or via our Chief Integrity Officer in the last financial year.

Endava continues to monitor potential risks relating to modern slavery and human trafficking within our business and supply chain, through our supplier screening process, Supplier Code of Conduct and other policies, as outlined above.



### **Further steps**

Mitigating potential risks of modern slavery and human trafficking within our business and supply chain is a priority for Endava, and we are always exploring new methods to that effect. In particular, Endava aims to implement the following steps in Financial Year 2024/2025:

- Expanding the scope of our supplier due diligence and screening process as outlined in this statement to cover all our suppliers going forward (not just those with an expected annual spend of more than £100K or suppliers that are based in medium to high risk countries);
- Ensuring that our supplier screening checks are repeated annually for all our suppliers (not just at onboarding stage, as is currently the case);
- Asking all our suppliers to be bound by our Supplier Code of Conduct as part of their onboarding process. This would be a significant change, as currently only those suppliers with an expected annual spend of more than £100K are required to sign up to our Supplier Code of Conduct; and
- Expanding the training module for our employees which covers ethics and compliance, including modern slavery and human trafficking.

