

Modern Slavery Act Statement

(Financial year ending December 31st, 2025)

Introduction

This statement sets out the actions that 74Software SA and its relevant subsidiaries including SBS Financial Software UK Limited, SBS Software SAS, SBS Software Belgium, SBS Software US Inc., SBS Solutions India Private Limited and Axway UK Ltd., Axway Pty Ltd. and Axway Inc. (“74Software Group”) has taken to understand the potential risks to its business from modern slavery and to ensure that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to the financial year ending 31st December 2025.

74Software Group is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to enduring that its supply chains are free from slavery and human trafficking.

74Software Group recognizes that it has a responsibility to take a robust approach to prevent slavery and human trafficking at all times and continues its activity to identify and address the risks of modern slavery in its operations and supply chains.

Organizational structure, business and supply chains

74Software is the parent company of the 74Software Group. A more detailed organizational group chart is available at the 74Software Universal Registration Document available at:

[74software.com/sites/default/files/financial_documents/2024 - DEU - VEN - 24 mars 2025_0.pdf](https://74software.com/sites/default/files/financial_documents/2024_-_DEU_-_VEN_-_24_mars_2025_0.pdf)

74Software is headquartered in Annecy, France and its shares are listed for trading on Euronext Paris. 74Software is a global enterprise software group that operates a portfolio of enterprise software solutions under the brands of SBS and Axway:

SBS provides banking software, and IT services to financial services organizations throughout Europe and in the UK, and designs technology solutions for financial institutions. SBS solutions address the core operational, regulatory and transformation needs of banks and specialized finance players across a wide range of geographies and business models.

Axway is a leading provider of enterprise integration and data exchange software, addressing critical application infrastructure and middleware needs for large organizations.

74Software Group's supply chains primarily comprise suppliers within the UK, US or Europe. 74Software Group avoids contracting with suppliers or sub-contractors located in areas where there is a higher risk of slavery and human trafficking than there is in Europe, US and the UK. However, we recognize that our upstream supply chain does include countries with a higher risk of modern slavery or human trafficking, and we expect our suppliers to prevent and avoid slavery and human trafficking in their supply chains in higher-risk countries. We also recognize that modern slavery and human trafficking do occur in Europe, US and the UK.

Policies and procedures

The policies and procedures of 74Software Group which prevent slavery and human trafficking in their operations and supply chain include the following:

- **Code of Ethics** (74Software)
- **Supplier and Partner Charter** (74Software)
- **Whistle-Blowing Policy** (74Software)

Due Diligence Processes

74Software Group's compliance with relevant employment legislation promotes human rights and ensures that:

- Our employees are not being exploited, are safe at work, and that relevant health and safety and human rights laws are adhered to, including freedom of movement and communications; and
- Our contracts of employment and our leavers Employment policy allow employees to serve notice of termination of their employment at any time.

74Software Group's pre-employment screening process ensures that all candidates have a right to work in accordance with applicable law, and that we do not seek to withhold any individual's identity documents.

74Software Group employees, when applicable, are paid at least the national minimum wage. SBS Financial Software UK Limited has been accredited as a Living Wage Employer by undergoing certification from the Living Wage Foundation. As such, we have committed to paying the Real Living Wage.

74Software Group adheres to all relevant legislation with respect to working time, time off, minimum amounts of holiday, time off for personal emergencies or sickness, and maternity/paternity leave.

Regarding local supply chain management, the ability of suppliers to sign up to the Supplier and Partner Charter and publish their own Modern Slavery Act statement is an evaluation criteria used for identifying key suppliers or strategic suppliers.

Risk Management

74Software Group does not consider its provision of IT services as a service at high risk of being connected with activities more commonly associated with modern slavery and human trafficking due to our services being provided in compliance with relevant applicable laws and regulations. However, any concerns of managers or employees with respect to modern slavery, people trafficking, or compulsory labour can be reported and escalated confidentially with surety. Any person raising such concerns will be protected under our Whistle-Blowing Policy.

Performance indicators

The performance indicators used to measure the effectiveness of 74Software Group's measures to combat modern slavery have been established as follows:

- For key and strategic suppliers, the number of key and strategic suppliers who have either published their own modern slavery act statement on their website or signed the Supplier and Partner Charter;
- For internal training, the number of new employees who have been directed to relevant Human Resources policies during induction.

74Software Group's target for 2025 is to achieve as close to 100% for both performance indicators.

Training

The board of directors and the senior executive management staff have been briefed on the importance and practical considerations of the Modern Slavery Act. They are committed to upholding the values described in this statement. This statement and other relevant information will be made available to all employees upon publication and on an ongoing basis, including through the new starter's process and new starter's mandatory ethics trainings.

Declaration

This statement has been approved by the board of directors of 74Software Group and is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes 74Software Group's slavery and human trafficking statement for the financial year ending December 31st 2025.



Patrick M. Donovan