



## Statement on Modern Slavery

This statement for and on behalf of ThoughtWorks Holdings Limited and ThoughtWorks, Ltd. ("Thoughtworks") is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") for the Financial Year ending 31 December 2022 and has been adopted by the Boards of both companies by way of Written Resolution on 22 September 2023. Both of the aforementioned entities are UK registered companies and are part of the wider Thoughtworks group. Thoughtworks is a business consulting and software delivery company and a community of passionate, purpose-led, individuals. We think disruptively to deliver technology to address our clients' toughest challenges, all while seeking to revolutionise the IT industry and create positive social change.

Thoughtworks' purpose is to create an extraordinary impact on the world through our culture and technology excellence. This purpose frames the decisions we make and the behaviours we demonstrate together with five aims, one of which is to "amplify positive social change and advocate for an equitable tech future". We abhor and reject discrimination and inequality and promote diversity in all its forms. We proudly, passionately and actively strive to make both Thoughtworks and our industry more reflective and inclusive of the society that we serve. In the pursuit of this mission, the Thoughtworks group of companies shall uphold the highest ethical and legal standards. For more information about Thoughtworks' social change work please visit <https://www.thoughtworks.com/about-us/social-change>.

Thoughtworks prides itself on maintaining high standards of integrity and has workplace policies to ensure that all our employees are treated with respect regardless of gender, race, religion, ethnicity, age, sexual orientation, national origin, disability or any other protected characteristics. You can read more about our culture and initiatives around Diversity, Inclusion and Belonging at <https://www.thoughtworks.com/about-us/diversity-and-inclusion>.

We strongly support the aim of eradicating modern slavery, forced labour<sup>1</sup> and human trafficking<sup>2</sup> and are committed to acting ethically and transparently in our internal business operations and are committed to implementing the appropriate measures to ensure that the same standard is applied to external suppliers.

We set working conditions and employ staff in compliance with applicable laws. Fostering a safe and healthy working environment for employees and supplier staff is of significant importance to our business and is supported by various workplace policies, including the Thoughtworks [Code of Conduct](#) and the [Thoughtworks Anti-Bribery and Anti-Corruption Policy](#).

With regard to our internal business operation, we have assessed the likelihood of modern slavery and human trafficking existing within our own organization or supply chain to be very low. This is based, for example, on the nature of work performed by our employees as well as their working conditions and terms; the locations of our offices and those of our clients; the limited extent of, and the nature of the firms that make up our supplier network; and our recruitment process.

We are confident that our extensive employee recruitment process that includes verifying an individual's right to work in the United Kingdom, appropriate documentation in support of the employment relationship, and adherence to minimum wage requirements go a long way to limiting the possibility of modern slavery or human trafficking existing within our organization. In addition, due to the nature of

---

<sup>1</sup> Forced labour involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

<sup>2</sup> Slavery and Human Trafficking offences have the same definition as outlined in section 1 and 2, Part 1 of the Modern Slavery Act 2015.



our global business which requires employees to travel to or from any of our group companies based outside of the United Kingdom, Thoughtworks takes measures to ensure that this only takes place in strict adherence to local immigration rules including but not limited to compliance with relevant local employment laws and wages standards.

In order to deliver our Modern Slavery programme key managers and support personnel have received intensive training so that can identify and manage modern slavery risk. We also have a mandatory firm wide training module that all of our people complete. This training covers the scale and impacts of modern slavery, our role in combatting it, and considerations with respect to our supply chain.

Given our culture of open communication, we encourage all our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of Thoughtworks. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. To enable this we have implemented the Thoughtworks Integrity Helpline and [Global Speak Up Policy](#) for employees to report concerns anonymously, should they wish to do so.

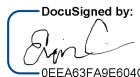
In order to ensure the prevention of modern slavery and human trafficking in our supply chain, we review our suppliers on a risk basis. On that basis, and for example, we hold the Modern Slavery Statements from key suppliers such as, our cleaning and maintenance services company, couriers and document storage providers in particular as evidence of their commitment to uphold the necessary standards. We shall continue to request and hold Modern Slavery Statements from our suppliers on a regular audit cycle.

In addition, Thoughtworks' supplier onboarding process requires suppliers to confirm they comply with key ethical practices including a commitment to eliminate modern slavery, forced labour, child labour, and human trafficking in it's supply chains and any of its corporate activities.

We measure the effectiveness of our programme in ensuring that slavery and human trafficking is not taking place in our business or supply chains through performance indicators. Example performance indicators include a) the number of Thoughtworkers taking the modern slavery module, b) key suppliers who publish a modern slavery statement, c) number of suppliers whose onboarding included a modern slavery questionnaire. All of these performance indicators are currently at 100%.

The process of identifying and eliminating risks of modern slavery and human trafficking from our organisation and supply chain requires continuous review and improvements to our practices and policies. We will continue to identify and make appropriate plans and implement measures to enhance our due diligence processes for current and future suppliers to lower the risks of such practices, and to ensure our ongoing compliance with the Act.

**Signed on behalf of Thoughtworks Holdings Limited and Thoughtworks, Ltd.**

DocuSigned by:  
  
0EEA63FA9E604C9...

Name:

Title:

Date: