

# T-Systems Limited Slavery and Human Trafficking Statement 2024

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#### Introduction

This document is published in accordance with the Modern Slavery Act 2015, Part 6, Transparency in Supply Chains etc. and constitutes T-Systems Limited's (hereinafter "**T-Systems**") slavery and human trafficking statement for the year ending 31 December 2023

T-Systems in no way accepts modern slavery or human trafficking in our organisation or in our supply chain.

T-Systems' Code of Conduct and Code of Human Rights and Social Principles sets out the standards expected of all staff, and opposes illegal and inhumane behaviour practices, including slavery, servitude, forced or compulsory labour and human trafficking. The Code of Conduct and Code of Human Rights and Social Principles makes clear that we support universal human rights, including equal employment, freedom of speech and of association, and cultural, economic, and social well-being.

T-Systems management openly discusses the topic of Modern Slavery with its employees and emphasises the importance of adherence to the code. It is also ensuring transparency within its Suppliers and ensures that they sign up to relevant contractual clauses and our Code of Conduct. Whilst the reputation of T-Systems and the trust and confidence of our customers and stakeholders is central to the continued success of our business, we are committed to ensuring that the operation of this business is not founded on any elements of Modern Slavery.

Section 54(2) of the Modern Slavery Act 2015 governs the activities of T-Systems.

# **Organisational Structure**

T-Systems Limited, a private limited company incorporated in England and Wales, is a wholly owned subsidiary of T-Systems International GmbH; both are members of the Deutsche Telekom AG ("**DTAG**") Group of companies.

As a subsidiary of DTAG Group, T-Systems is a provider of IT services to customers both in the locally and internationally. The services delivered are provided entirely locally or with the collaboration of other DTAG Group companies and/or with the use of our external partner eco-system.

T-Systems does not participate in the manufacture of any goods.

T-Systems' Board of Directors takes its commitments to preventing modern slavery and protecting human rights very seriously and has responsibility for producing this statement.

Compliance, Finance, HR, Legal, Marketing, and Procurement functions, as well as all senior management, have responsibility for ensuring T-Systems meet these standards, that our workers are protected, and that risks are identified and appropriately mitigated. All staff throughout our organisation have responsibility for adhering to the standards set out in this statement.

# Policies in Relation to Slavery

T-Systems has published a UK Modern Slavery Act policy.

All members of the DTAG Group operate in accordance with the DTAG Code of Conduct, DTAG Code of Human Rights and Social Principles and the DTAG Supplier Code of Conduct. These taken together reflect the groups commitment to behaving ethically and conducting itself with integrity in all our business relationships. We have a zero-tolerance approach to abuse of human rights and to ensuring that measures are in place to recognise and prevent Modern Slavery.

DTAG operate a whistle-blowing policy, "Tell Me", which encourages employees to confidentially report any wrongdoing in relation to Modern Slavery and all reports are fully investigated and appropriate remedial actions taken where necessary.

#### **Due Diligence Processes**

As part of the due diligence processes for on-boarding suppliers, a review of the controls connected to slavery and human trafficking undertaken by the supplier will always be conducted. T-Systems will not support or deal with any business knowingly involved in slavery or human trafficking.

T-Systems' Vendor Service Agreement has a Modern Slavery Act clause which suppliers must agree to when they sign up to T-Systems' contracts. Any supplier who signed a contract has confirmed their acceptance of the clause.

Within the T-Systems' Request for Proposal (RFP), a prospective supplier must confirm that they are acting in accordance with the requirements of the Modern Slavery Act to be able to continue in the tender process.

#### **Ongoing Risk Assessment**

All providers of goods or services to T-Systems are required to provide a copy of their own slavery and human trafficking statement and these are kept on file. During scheduled periodic reviews of supplier performance checks are carried out to ensure the full supply-chain is maintaining compliance with their own policies and current legislation.

T-Systems subscribes to the National Living Wage. T-Systems actively contracts for personnel support on this basis.

# **Training on Slavery and Human Trafficking**

When the Modern Slavery Act 2015 was first implemented all current T-Systems staff and contractors were required to undertake a bespoke slavery and human trafficking training module within the DTAG on-line training facility "HR Suite". The requirements of the Modern Slavery Act and developments thereto were again presented to staff in 2023 at a 'Campfire' communication session. Refresher training, this time in video form, was also made available in 2023 to each member of staff and it is known that 74% of employees have undertaken this training.

#### **Steps to Measure Effectiveness**

Periodic reminders of the Company commitment to Modern Slavery are sent out on e-mail to employees and published on our Intranet.

# **Continuous Diligence**

T-Systems continues to operate a zero-tolerance approach to modern slavery and human trafficking in our organisation and in our supply chain, and commits to:

- 1. Identify, assessing and monitoring potential risk areas in our own business and our supply chains and taking appropriate action.
- 2. Ensure a high level of understanding of the risks of slavery and human trafficking by providing advice and training to our employees.

In 2024, T-Systems plans to rerun its Modern Slavery training with particular reference to the activities to be undertaken by the House of Lords Select Committee, on strengthening the Modern Slavery Act.

# Approval

This statement has been approved by T-Systems Limited Board of Directors on the 6th of June 2024 and signed by all the Officers of the Company.

It is publicly available on our website at: https://www.t-systems.com/gb/en/modern-slavery-act-policy

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Jeevan D'Silva – Company Secretary