



Statement on Modern Slavery

This statement for and on behalf of Thoughtworks Holdings Limited, the holding company, and Thoughtworks, Ltd., the operating company, (together "Thoughtworks") is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") for the Financial Year ending 31 December 2024 and has been adopted by the Boards of both companies by way of Written Resolution dated 22 July 2024. Both of the aforementioned entities are UK registered companies and are part of the wider Thoughtworks group with the ultimate parent company Thoughtworks Holding Inc, a NASDAQ listed company. 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. Given the nature of our business, our supply chain is limited. Goods and services are procured from a limited range of suppliers that are required to operate in a manner aligned to our [Code of Conduct](#) and the [Thoughtworks Anti-Bribery and Anti-Corruption Policy](#). Suppliers must be committed to eliminating modern slavery, forced labour, child labour or human trafficking, in their supply chains and in any of their corporate activities as a requirement to gaining a place on our supplier portal. The goods and services procured predominantly include professional services from preferred recruiters, consultants, advisers and other business partners; IT equipment and related services (including global IT platform providers); and goods and services in the course of our day to day operations (for example cleaning services for our offices) or generic business supplies (stationery and basic kitchen supplies.)

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 labour¹ and human trafficking²

¹ 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/herself voluntarily.

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



and are committed to acting ethically and transparently in our internal business operations and 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. This is supported by the training we require of our employees of our Code of Conduct including identifying modern slavery in the workplace and human trafficking, and various workplace policies such as the Thoughtworks [Code of Conduct](#) and the [Thoughtworks Anti-Bribery and Anti-Corruption Policy](#).

With regard to our internal business operations, we have assessed the likelihood of modern slavery and human trafficking existing within our own organisation 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; the mandatory training provided to employees and our recruitment processes. In order to deliver our Modern Slavery programme key managers and support personnel have received intensive training so that they can identify and manage modern slavery risk. We also have a mandatory firm wide training module that all of our people complete prior to acknowledging the company's code of conduct. This training covers the scale and impacts of modern slavery, our role in combating it, and considerations with respect to our supply chain."

Thoughtworks' risk of modern slavery and human trafficking is assessed and managed continuously. 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 organisation. In addition, due to the nature of 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.

Given our culture of open communication, the risk is further mitigated as 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. 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 its 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 reading and acknowledging the Company's Code of Conduct every year, which has a section on respecting human rights and fair labour practices, including a statement relating to modern slavery, b) the key suppliers who publish a modern slavery statement, c) Confirmation of compliance with the Modern Slavery Act for suppliers onboarded to our invoicing system since 2021. All of these performance indicators are reviewed regularly.

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.

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