



### Introduction

Modern slavery as defined in the United Kingdom’s (U.K.) Modern Slavery Act 2015 can take many different forms, such as human trafficking, labour, criminal and sexual exploitation, and domestic servitude<sup>1</sup>.

TransPerfect acknowledges that even today millions of people fall victim to modern slavery worldwide in a wide range of industries either in a company’s own operations or its supply chains<sup>2</sup> and that the COVID-19 pandemic has increased the vulnerability of at-risk individuals to exploitative labour around the world<sup>3</sup>.

TransPerfect has a zero tolerance approach to any form of modern slavery both within its own operations as well as in TransPerfect’s supply chains. TransPerfect employees have a duty to be alert and to raise any concerns to management or the Human Resources department. All reported incidents will be investigated to ensure compliance with local legislation and TransPerfect’s internal policies.

This statement provides an overview of TransPerfect and its supply chains, policies and practices related to modern slavery, training initiatives and key performance indicators for the financial year from 1 April, 2022 to 31 March, 2023.

### Our Business and Supply Chains

TransPerfect is the world’s largest privately held language services and technology solutions provider with more than 7,500 employees in over 120 cities worldwide. The majority of TransPerfect’s offices are located on the European and North American continents as shown below.



<sup>1</sup> [U.K. Government Home Office, 2021.](#)

<sup>2</sup> [International Labour Organisation, 2017.](#)

<sup>3</sup> [U.K. Government Home Office, 2021.](#)



## Modern Slavery Statement 2022 – 2023

TRANSPERFECT

In line with TransPerfect's core values, the relationship with all our suppliers is built on integrity and mutual respect. The selection process of independent contractors includes due diligence with respect to right to work confirmation. Similarly, when selecting corporate suppliers, their reputation and compliance with legislation are taken into account.

TransPerfect is not aware of any allegations of modern slavery against any of its current suppliers. If allegations arose, TransPerfect would take immediate action and report the suspected incident to the relevant authorities.

### **Policies and Practices**

TransPerfect maintains the below policies which help to prevent modern slavery:

- Two of TransPerfect's core values: respect and integrity – at TransPerfect we are committed to treating everyone with whom we interact, from our clients to our co-workers, vendors and business partners with the ultimate level of respect. Moreover, TransPerfect strongly commits to ethical and honest conduct at all times and to always doing the right thing. As a result, we cannot tolerate any form of modern slavery.
- Standards of Business Conduct and Statement of Respect – TransPerfect's standards of business conduct and statement of respect encourage employees to treat fellow employees, clients and vendors with courtesy and to resolve any differences in a professional, non-abusive and non-threatening manner. Employees are expected to maintain the highest ethical standards in the conduct of Company affairs and in their relationship with customers, suppliers, employees, advisors and the communities in which our operations are located.
- Recruitment Policy on Employee References – reference and background checks on candidates are conducted globally in accordance with all applicable laws. This includes eligibility to work checks in order to safeguard against human trafficking.
- Workplace Violence Policy – this policy helps to maintain a safe and healthy work environment free from intimidation, threats or violent acts. This encompasses behaviour towards employees, visitors, clients and other individuals with whom TransPerfect conducts business. All TransPerfect employees have a duty to warn supervisors or the Human Resources department of any incidents. TransPerfect will investigate all reported issues promptly and thoroughly and will notify police or other law enforcement personnel where necessary.
- Open Door Policy – TransPerfect management and the Human Resources department maintain an open door policy. Employees are encouraged to bring forward concerns without fear of retaliation.
- Eligibility to Work Confirmation of Independent Contractors – All independent contractors confirm their eligibility to work as part of the standard independent contractor agreement in order to safeguard against human trafficking.
- Supplier Due Diligence (SSD) - A Supplier due diligence process is being implemented to identify and assess potential impacts and risks relating to modern slavery across our supply chain and will be put into practice before the end of 2023.



### Training

All new hires in TransPerfect's global workforce complete a mandatory training module on modern slavery as part of their initial training. This training module raises awareness of modern slavery amongst TransPerfect's workforce, reconfirms TransPerfect's zero tolerance approach to modern slavery, sensitises employees to the signs of modern slavery and provides guidance on how to respond in case of suspected modern slavery. Moreover, an Annual Refresher Training is mandatory for TransPerfect's employees, which reinforces general topics including modern slavery.

### Key Performance Indicators

TransPerfect has defined the following key performance indicators in order to measure the Company's success in reducing the risks of modern slavery.

- Number of reports made by employees, the public or law enforcement agencies regarding suspected risks of modern slavery
- Number of employees sensitised to modern slavery
- Number of instances of suspected modern slavery with regard to TransPerfect's suppliers
- Investigations undertaken into reports of modern slavery and the actions taken

This statement was approved by Stacey Watanabe, Global Compliance and Privacy Officer at TransPerfect.

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Stacey Watanabe

Global Compliance and Privacy Officer