

## Annex 1

### **MODERN SLAVERY ACT – Luxoft Group**

#### **COMPANY OVERVIEW AND SERVICES**

Luxoft Holding Inc. (NYSE:LXFT) together with its subsidiaries form the "Luxoft Group".

Luxoft Group is a global consulting partner that offers end-to-end digital solutions to solve clients' business challenges. With our headquarters in Zug, Switzerland and 42 global locations (<https://www.luxoft.com/contact-form/>), we operate in 21 countries across five continents, providing global delivery platforms. We commit to acting ethically and with integrity in all our business dealings and relationships. We recognise that modern slavery is a crime and a violation of fundamental human rights. We maintain the same due diligence procedure for work carried out overseas and ensure all supply chains used outside are also monitored to the same standards.

#### **POLICIES AND PRACTICES**

Our "Corporate Code of Conduct" and "Code of Ethics" documents, which are publically available and globally applicable to all staff and suppliers, set out our commitment to uphold human right in all global relationships, as well as our zero tolerance policy in relation to modern slavery and human trafficking. We also have in place our publically available, globally applicable, "Partner Code of Conduct" with which all suppliers also are required to comply.

Suspected violations of any of these policies/standards can be reported as per our "Whistleblower Policy" which is publically available and globally applicable to all staff and suppliers. Any such reports are investigated at a senior level and taken seriously within the business.

#### **TRAINING**

As part of our induction process, all new employees and contractors are required to undergo a mandatory training session in relation to Luxoft's Code of Ethics and Corporate Code of Conduct. Reminders of the codes and training sessions are arranged annually.

#### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we have the following in place as part of our due diligence:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers.

We recognise that some of our contractors may come from countries that are high on the global slavery index. In order to ensure that our contractors have not been forced into work we conduct effective due diligence as part of our on boarding process.

We regularly conduct appropriate due diligence assessments to review our employment practices and workplace environments around the world, and are committed to take the appropriate action if we identify concerns.

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We ensure all those in our supply chain and contractors comply with our values and ethics. This includes ensuring that companies are registered with the correct authorities and that they abide by all applicable laws.

### **LOOKING AHEAD**

Luxoft Group continues to review our human rights efforts, as well as best practices in the marketplace, to understand how we can further strengthen our commitment to ensure slavery and human trafficking are not taking place within our organisation or our supply chains. Our next steps may include: further education of our employees on the issues of modern slavery, and the continued enhancement of our supplier and vendor due diligence processes.

This Statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ('Act') and sets out the steps that Luxoft has taken during the previous financial year to ensure that slavery and human trafficking is not operating within either its own business or its supply chains.

This Statement has been approved by the Board of Directors for Luxoft Holding, Inc

SIGNATURE:



NAME: Dmitry Loschinin

POSITION: CEO

DATE:

*8 April 2019*