

## **Modern Slavery and Child Labour Policy and Statement For the Financial Year 2023**

December 2023

At BETA CAE Systems, human rights, labour rights, and the wellbeing of people, are of paramount importance. We are committed to implementing and improving our policies and practices to combat Modern Slavery, Child Labour, and Human Trafficking. We consider Modern Slavery, constituted of slavery, servitude, forced or compulsory labour, Child Labour, and Human Trafficking, as crimes resulting in an abhorrent abuse of Human Rights. We recognise that Modern Slavery, Child Labour, and Human Trafficking are existing issues in the world, especially in certain high-risk locations and industries. We do not practice, and we do not tolerate, Modern Slavery and Child Labour in our business or supply chain. We are committed to acting ethically and with integrity in all our employment practices, business dealings and relationships, and to implementing and enforcing effective practices to ensure that any form of slavery is not taking place in our own business or suppliers.

### **Our Organisation**

BETA CAE Systems is a private engineering-software development and services company, active in the field of Engineering Simulation and Analysis, for numerous simulation disciplines and industries. BETA has a legacy of more than 30 years of activity in the field of engineering software and services. BETA CAE Systems International AG, based in Switzerland, was established in 2016 as the primary entity of a group that comprises 9 more affiliate companies. BETA CAE Systems International AG employs 20 people in Switzerland, and the whole group of BETA companies employs more than 580 people, in 14 sites in Asia, Europe and North America. This worldwide network is supplemented by 8 independent business partners.

### **Relevant policies**

We effectively implement policies and procedures at our workplace to ensure that we are conducting business in an ethical and transparent manner, and that we respect, protect, and promote moral, humane, and legal employment terms and conditions.

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The framework of our Corporate Social Responsibility comprises, among others:

- Code of Ethics
- Code of Conduct
- Working Environment policy
- Supplier Corporate Responsibility policy

The above are complimented by our:

- Health and Safety policy
- Grievance Procedure

Key relevant issues addressed, and principles statements incorporated in our policies:

- We support and respect the protection of internationally proclaimed human rights.
- We advocate the elimination of all forms of forced and compulsory labour.
- We advocate the abolition of child labour.
- We operate a robust and transparent recruitment policy.
- We actively seek to offer our employees a positive, healthy, and safe working environment, and ensure that they have rewarding careers and job satisfaction.
- We are committed in responsible sourcing of supplies.
- We refrain from exercising discriminating, disciplinary or retaliating practices against protesting, complaining or whistleblowing.

## **Our suppliers**

The software business sector is not considered one most 'at risk'. Our upstream transactions are conducted mainly with independent service providers and goods vendors, on an ad hoc basis. Our upstream B2B transactions are only with suppliers of knowledge-intensive expert services. BETA is not engaged into intricate supply chains, partnerships, or business relationships with vendors and distributors based in high-risk regions, or from high-risk business areas, as far as slavery, child labour, and human trafficking are concerned.

## **Risk assessment and Due diligence**

BETA CAE Systems has high standards of Business Ethics and expects the same from all our suppliers. As part of our initiative to identify and mitigate risk, BETA conducts selective risk assessment for several key service suppliers.

During the 12 months the Risk Assessment process was extended to a larger number of our service and goods suppliers for more accurate risk assessment.

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There were not any findings that would indicate that these suppliers are of high risk to deviate from the principles of respecting human and labour rights, while several of the service and goods suppliers have published satisfactory policies and statements for business ethics, code of conduct, and/or slavery and human trafficking. Therefore, no additional thorough Due Diligence steps considered.

This risk assessment will review this situation on an annual basis.

During the last months BETA CAE Systems reviewed at new its Codes and Policies, to address more specifically the problems of Modern Slavery, Child Labour, and Trafficking.

BETA affirmed that clauses on Working Conditions and Human Rights are in place in the company's "Supplier Corporate Social Responsibility & Sustainability Requirements" policy. No need for significant revisions emerged.

BETA performed at new a thorough review of the Swiss Code of Obligations to assure compliance with any updates introduced to the national legislation of Switzerland. No need for important additional actions emerged in order to comply with the legislation.

This year BETA performed at new a materiality analysis and concluded that Modern Slavery, Child Labour, and Trafficking matters are not considered as factors in the domain of our activity. Moreover, established a dedicated reporting communication channel for compliance matters, including child labor.

BETA may terminate its relationship with a supplier if it is in breach of our policy or may elect to work with the supplier to resolve the issue.

## **Awareness and Training**

BETA makes available to its employees, through the internal corporate network, awareness and self-training material on slavery and human trafficking, along with those for Health and Safety, Business Ethics, and Human Rights and Working Conditions.

## **Reporting**

An employee or supplier must report any incidence or suspicion of Modern Slavery or Human Trafficking at the earliest possible stage. Incidents or suspicion of Modern Slavery, Child Labour, or Human Trafficking can be reported to the company's compliance committee < [compliance@beta-cae.com](mailto:compliance@beta-cae.com) > or to the local authorities.

## **Further actions**

BETA CAE Systems will perform at new a materiality analysis to revise the current findings, in needed. In case of higher risk considerations, the company will extend the Risk Assessment process to a larger number of our service suppliers.

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This statement is made voluntarily pursuant to section 54 of the UK Modern Slavery Act 2015 and the Swiss Federal Act on the Amendment of the Swiss Civil Code - Part Five: The Code of Obligations, (1 January 2022), Article 964j, and constitutes the Modern Slavery and Child Labour Policy and Statement of BETA CAE Systems International AG, on behalf of itself and its affiliates for the financial year 2022.

A management responsibility has been agreed for this policy and statement and unanimous endorsement has been received from the Board of Directors.

The Chairman  
P. Kouvrakis

The previous statements can be accessed online as:

[BETA CAE Systems Modern Slavery Act Policy and Statement 2021](#)

[BETA CAE Systems Modern Slavery Act Policy and Statement 2022](#)

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