

Modern Slavery Statement

2025

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Our commitment

Bending Spoons¹ is committed to protecting human rights and preventing modern slavery and human trafficking in our business and supply chain. In accordance with the UK Modern Slavery Act 2015, we take responsibility for promoting ethical working conditions across our operations.

Business and supply chain

At Bending Spoons, we develop software products and acquire and transform digital businesses. We don't engage in the manufacturing, distribution, or sale of physical products.

Our supply chain consists primarily of globally distributed suppliers providing cloud-based software, infrastructure, and professional services.

Our actions


We take the following actions to identify and mitigate risks related to modern slavery:

- We perform due diligence on higher-risk suppliers, in line with our procurement policy
- We map risks across our operations to identify potential areas of vulnerability
- We make a whistleblowing channel available on our website for secure and confidential reporting
- We've adopted an organization, management, and control model under Italian Legislative Decree 231/2001, and a code of ethics

¹ Any reference to *Bending Spoons*, *the company*, *we*, or *us* means Bending Spoons Operations S.p.A. and its affiliates.

- We've appointed a supervisory committee under Italian Legislative Decree 231/2001
- We provide training programs for team members designed to build awareness and promote responsible conduct

This statement was approved by the board of directors of Bending Spoons Operations S.p.A. on December 18, 2025.

A handwritten signature in black ink, appearing to read 'Luca Ferrari', written over a horizontal line.

Luca Ferrari
Chief executive officer