

## Dassault Systèmes

### Modern Slavery Transparency Statement

#### For financial year ending 31 December 2025

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015. It sets out the steps that Dassault Systèmes S.E. and its subsidiaries (**Dassault Systèmes**, the **Company**, **we**, **us**, **our**) have taken, and continue to take, to prevent Modern Slavery and human trafficking in our business and supply chains.

As stated in our Code of Business Conduct, we are committed to acting ethically and with integrity in all our business relationships. This includes taking steps to help eliminate slavery and human trafficking from our business and supply chains. We are a *Societas Europaea* (European Company) operating mainly across three geographic regions – Europe, the Americas and Asia – through locally established entities. In the United Kingdom, our main subsidiary is Dassault Systemes UK Limited. We are aware that Modern Slavery exists, including in the UK, and recognise that we cannot be complacent in seeking to prevent it.

Dassault Systèmes is also committed to transparency in its own business and in its approach to tackling Modern Slavery in its supply chains, in line with its disclosure obligations under the UK Modern Slavery Act 2015.

#### I. Our business

**Dassault Systèmes' purpose is to provide businesses and people with 3DEXPERIENCE universes that enable them to imagine sustainable innovations capable of harmonizing product, nature, and life.** This purpose reflects the Company's commitment to societal and environmental progress.

Dassault Systèmes' entrepreneurial and long-term vision drives its 25,000 employees across 188 sites and is reflected in the trust placed in the Company by its customers.

In 2024, the Company unveiled its new 2040 strategic vision – and its aim of catalyzing a generative economy by learning from nature's generative processes to build a sustainable world for consumers, patients, citizens and students.

In 2025, to ignite the generative economy, Dassault Systèmes launched its 3D UNIV+RSES – combinations of AI-powered virtual twins that virtualize entire product lifecycles.

#### **A Strategy Built on Three Concepts: Human, Industry, Experiences.**

“Human” places people at the center of Dassault Systèmes' concerns, leveraging imagination, knowledge, and expertise to contribute sustainably to the well-being of all. “Industry” means delivering what is most valuable to customers, giving them a sustainable competitive edge. “Experiences” reflects the ambition to help every business and individual project themselves into, build, and inhabit this “new new world” – a blend of real and virtual – that is now ours.

## **Customers as Catalysts and Partners in Industry Transformation**

Dassault Systèmes' strategy is dedicated to driving the transformation of three key sectors: Manufacturing Industries, Life Sciences and Healthcare, and Infrastructure and Cities.

Dassault Systèmes has built an ecosystem of unparalleled scale, bringing together a community of over 390,000 customers, 45 million users, and 12 million students – as well as a highly dynamic network of 20,000 partners, 25,000 startups, and 120,000 makers. For these stakeholders, Dassault Systèmes develops 3D UNIV+RSES, pushing the boundaries of innovation, learning, and production. These interconnected virtual twins, embedded in a secure digital environment, accelerate the development of innovative products and services while enhancing efficiency and sustainability.

## **A Unique Approach to AI for Industry**

Dassault Systèmes uses AI to augment its virtual twins and 3D UNIV+RSES. The Company doesn't just add AI features to existing systems – it creates science-based 3D UNIV+RSES that can thoroughly reshape industrial processes. The Company aims to make AI a trusted, sovereign, and powerful technological tool, driving transformation and enabling organizations to explore new frontiers.

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Achievement of our purpose – “harmonizing product, nature and life” – is built on integrity, collaboration and mutual respect. For Dassault Systèmes, pursuing ethical and sustainable growth is a fundamental value and one of the pillars of our Corporate Principles of Social Responsibility. A deep-rooted culture of ethics and compliance informs all aspects of Company management and the decisions made by our workforce each day.

## **II. Our Suppliers**

As a software company, we purchase indirect goods and services. Our main procurement categories are:

- Facilities and Real Estate;
- Human resources-related services;
- Marketing, Communication and Events;
- Professional Services;
- Software, Hardware, Network, Telecommunications and Video;
- Contractors;
- Travel.

Dassault Systèmes has implemented procurement policies and seeks to engage its suppliers on corporate social responsibility issues.

## **III. Risk Assessment**

### **A. Supplier Risk Assessment**

Dassault Systèmes has established a supplier risk management system aimed at ensuring

appropriate oversight of critical suppliers.

A supplier risk mapping exercise was carried out in 2018 by the Procurement Department with the support of an external firm. It was subsequently reviewed internally in 2022 and again in 2024 as part of the double materiality assessment. This exercise confirmed the limited nature of the risks of serious harm relating to Modern Slavery and human trafficking.

An updated mapping of environmental, social and ethical risks is currently being finalised. It is based on a combination of external data provided by our partner EcoVadis (including industry- and country-specific risks across our supplier base) and Dassault Systèmes' own criteria (such as criticality and spend levels).

This initiative will enable a more granular identification of material environmental, social, and governance risks and support targeted, effective action plans. In line with the commitments of the Responsible Supplier Relations and Purchasing label (RFAR) – awarded to Dassault Systèmes in 2024 and aligned with ISO 20400 – Dassault Systèmes' ambition is to foster a supply chain that is both sustainable and resilient, combining high standards with supplier engagement and support.

## **B. Duty of Vigilance Risk Assessment**

Pursuant to the 2017 French Law on the Duty of Vigilance, and as set out in our Vigilance Plan, we have continued, as in prior years, to implement measures to mitigate risks in three areas: Human Rights and Fundamental Freedoms, including risks related to Modern Slavery, the environment and the health & safety of individuals. The effectiveness of these measures is assessed annually through our Vigilance Plan.

The Duty of Vigilance risk assessment, conducted at the global level and reviewed in 2025 by the Duty of Vigilance Steering Committee, identified the main risks that could arise from the Company's activities, its business model, or those of its suppliers and subcontractors. As a software publisher, Dassault Systèmes has limited exposure to severe risks relating to Modern Slavery. Unlike certain other industries, the intangible nature of its activities significantly reduces such risk, particularly risks associated with complex supply chains.

Nevertheless, the Company acknowledges that such risks may arise in connection with certain third parties, particularly in the procurement of IT equipment or technology infrastructure. Dassault Systèmes therefore maintains a robust Duty of Vigilance framework to prevent and manage those risks.

For additional information, please refer to our Vigilance Plan, as published in the 2025 Annual Report (Universal Registration Document), available on our website at <https://investor.3ds.com/>, in particular section 2.4, "Maintain a Vigilance Plan".

## **IV. Risk Management**

### **A. Our Policies & Procedures**

Our business ethics are based on international standards relating to human and social rights, as set out in the International Bill of Human Rights, the United Nations Convention on the Rights of the Child, the OECD Guidelines for Multinational Enterprises and the Fundamental

Conventions of the International Labour Organization.

Furthermore, Dassault Systèmes is a member of the United Nations Global Compact.

We therefore rely on a number of internal and external policies and procedures to ensure that we conduct business in an ethical and transparent manner. These include:

- **Code of Business Conduct** (see <https://www.3ds.com/sites/default/files/2021-11/code-of-business-conduct-english.pdf>): the Code was reviewed in 2024. It applies to all Dassault Systèmes employees and:
  - includes our ethics and compliance principles and expresses our corporate commitment to ensuring that business is conducted in accordance with high ethical standards;
  - confirms that our business practices are carried out in accordance with the local and national employment laws applicable in the jurisdictions in which we operate;
  - requires our employees to comply with international standards, such as the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization, which prohibit forced or compulsory labour, servitude, slavery and human trafficking;
  - forms the basis of the annual mandatory online ethics and compliance training provided to all employees.
- **Corporate Principles of Social Responsibility** (available on the following webpage <https://www.3ds.com/sites/default/files/2021-11/csr-principles-en-27-11-2018.pdf>): this policy sets out the minimum international standards on Human Rights and environmental protection we expect all our partners and suppliers to adhere to (the “**CSR Principles**”). These CSR Principles include the elimination of forced labour and other forms of Modern Slavery.
- **Sustainable Charter with Suppliers** (available on the following webpage [https://www.3ds.com/assets/invest/2024-12/2024\\_12\\_06\\_en\\_supplier-sustainable-charter.pdf](https://www.3ds.com/assets/invest/2024-12/2024_12_06_en_supplier-sustainable-charter.pdf)): as part of our continuous improvement approach, this document sets out our expectations for suppliers and our reciprocal commitments in relation to sustainability matters, including Human Rights and Modern Slavery:
  - prohibition of child and forced labour;
  - respect for the right to freedom of association and collective bargaining;
  - prohibition of all forms of discrimination;
  - ensuring a safe and healthy working environment and appropriate working conditions;
  - prevention of illegal labour and unlawful subcontracting.

The Company may immediately terminate a contract with a supplier in the event of a breach of its commitments under the Sustainable Charter with Suppliers.

The **CSR Principles**, together with the **Code of Business Conduct** and the **Sustainable Charter with Suppliers**, are intended to serve as reference documents for all Dassault Systèmes employees, guiding their behaviour and interactions in their daily activities, and

to support the commitment of our partners and suppliers. They are available on our 3ds.com website at <https://www.3ds.com/about/corporate-responsibility/ethics-compliance>.

- **Dassault Systèmes ethics & compliance governance:** we have established an Ethics Committee and a Business Ethics & Compliance Department responsible for overseeing ethics and compliance across the Group (please see <https://www.3ds.com/about/corporate-responsibility/ethics-compliance> under the heading “Ethics and compliance governance”). Their scope of work covers all relevant ethics and compliance matters, including Human Rights and, consequently, Modern Slavery. The Ethics Committee meets monthly and is tasked with ensuring that employees adhere to the Code of Business Conduct and with investigating any case of alleged breaches brought to its attention, with a view to issuing recommendations or instructions.
- **Whistleblowing procedure:** any case of non-compliance with applicable laws – in particular in relation to Modern Slavery and forced labour – or with our Code of Business Conduct may be reported through the Whistleblowing procedure (available on the following webpage <https://www.3ds.com/about/corporate-responsibility/ethics-compliance/whistleblowing-alert-procedure>).

It encourages stakeholders to raise concerns relating to serious Human Rights infringements - including Modern Slavery - without fear of retaliation, and guarantees the confidentiality of their identity. Reports may be made by email at [People.Ethicscommittee@3ds.com](mailto:People.Ethicscommittee@3ds.com), through an online form (please see <https://www.3ds.com/about/corporate-responsibility/ethics-compliance/whistleblowing-form/>), by leaving a telephone voice message on a dedicated voicemail (the corresponding numbers are available on the following webpage <https://www.3ds.com/about/corporate-responsibility/ethics-compliance/whistleblowing-alert-procedure/how-make-alert-telephone>), or by requesting an in-person meeting with Dassault Systèmes’ Business Ethics & People Ethics managers (collectively, the “Reporting Officers”).

## B. Due Diligence

### i. Business Ethics & Compliance Department

As part of our approach to identifying and mitigating Modern Slavery and Human Rights risks within our operations, Human Rights considerations are embedded in our third-party due diligence processes.

In this context, the Business Ethics & Compliance Department performs integrity and risk assessments, including adverse media screening and analysis using specialized tools, to identify third parties that may present heightened risks related to corruption, Human Rights violations or Modern Slavery.

The outcomes of these assessments are documented in a standard level integrity due diligence analysis report, which incorporates Human Rights risk considerations. Based on these findings, the relevant stakeholders determine whether, and under what conditions, to engage with the third party.

In addition, we conduct ongoing monitoring of third parties through automated screening tools designed to detect integrity, corruption and Human Rights-related risks, and to identify matters requiring further review.

**ii. Procurement & Travel Department**

Our Procurement & Travel Department also contributes to identifying and mitigating Modern Slavery and Human Rights risks by conducting its own due diligence on suppliers. This process helps assess potential Human Rights impacts at the supplier level. The procedures governing these assessments are set out in the Sustainable Procurement Policy, which integrates Human Rights considerations into a range of good-practice requirements.

In addition, the Procurement & Travel Department conducts ongoing monitoring of risks related to Human Rights and fundamental freedoms. It uses a compliance platform to screen sanctions lists and identify adverse media relating to these matters.

**C. Alerts**

As described in Section IV. A, "Our Policies & Procedures", the Whistleblowing procedure enables the reporting of any case of non-compliance relating to Human Rights issues.

Suppliers are also informed of this mechanism through the Sustainable Charter with Suppliers, to which they are required to adhere.

**D. Training**

Ethics and compliance training for all employees has been in place since 2013. It includes aspects required under the 2017 French Law on the Duty of Vigilance, in particular those relating to Human Rights issues.

**Approval for this statement**

The Board of Directors of Dassault Systèmes S.E. approved this statement on 24 March 2026.

**Pascal Daloz**  
**Chief Executive Officer & Chairman**  
**Signature:**



**Date: 15 April 2026**