

Anti-Slavery and Human Trafficking Statement

1: Opening statement from senior management

Webhelp is committed to preventing acts of modern slavery and human trafficking from occurring within its business, and imposes the same high standards on its suppliers.

Webhelp has a zero tolerance stance on violations of anti-slavery and anti-human trafficking laws. Together with our business stakeholders we are committed to complying with the Modern Slavery Act (2015) ("Act") and The Human Trafficking and Exploitation Act 2015.

Our values are embedded in all of our Webhelp processes and engagements with our people, clients, and suppliers. We trust these values to be the building blocks of treating all our people, clients and suppliers ethically, with integrity and consistency.

This statement sets out our actions to understand potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in or connected to our business.

This statement relates to actions and activities during the financial year January 2018 – December 2018.

2: Structure of the organisation

Webhelp is a customer experience outsourcing company in the Business Process Outsourcing sector. It is part of the wider Webhelp Group, which employs more than 50,000 people in 90 different locations across 26 countries. To find out more about the nature of our business, please click <u>Webhelp</u>.

In order to provide our clients with customer experience solutions, we work with a range of suppliers. We have a direct relationship with the majority of our suppliers that have a base in the United Kingdom.

3: Policies

As part of our commitment to combating modern slavery, we have implemented the following policies which are review annually and confirm alignment to regulation in the statement period:

- Anti-Slavery and Human Trafficking Policy
- Code of Conduct and Business Ethics
- Anti-Bribery and Ethics Policy
- Supply Chain Management Policy UK
- New Supplier Process
- Whistleblowing Policy

We also aim to make sure our suppliers are aware of our policies, and adhere to the same high standards.

This policy is non-contractual and may be varied, altered or replaced from time to time and the company reserves the right not to apply certain aspects of the policy if it is appropriate to do so.

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4: Due diligence

We have been monitoring and reducing the risk of slavery and human trafficking occurring within our supply chain and will continue to do so in 2019 with the mandatory requirement for all suppliers to complete the New Supplier Questionnaire. We are aware of the nature of the Modern Slavery Risk associated with our industry and we continue to manage and develop our procurement process to ensure we have the correct level of due diligence taking place throughout our supply chain.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures and checks:

- Clear, open and transparent recruitment policy and processes
- Eligibility to work in the country checks
- Vetting of candidates joining the business
- Supplier contracted vetting
- Supplier due diligence checks
- Requirement for supplier to have a modern slavery statement or sign a modern slavery & human trafficking declaration

Our procedures are designed to:

- Identify, assess and monitor areas of potential risk in our business and supply chain
- Reduce the risk of slavery and human trafficking occurring in our business and supply chain
- Provide adequate reporting capability and protection for whistleblowers
- Provide a robust process to take appropriate action

5: Risk

Where we identify a potential risk, it is assessed and managed in line with our established risk framework ensuring that effective controls are in place to mitigate the risk identified.

6: Effectiveness and KPIs

Webhelp follows many processes to ensure adherence to the aforementioned Acts. Webhelp is ISO certified and as such independent checks and audits are completed by an external body. These audits include supplier management and recruitment policies and processes.

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7: Training

We are committed to educating and raising awareness with our employees, of the risks of modern slavery and human trafficking in our business and supply chains. Through our training and awareness activities with employees coupled with our accessible policies, employees are encouraged to identify and report any potential breaches of the organisation's anti-slavery and human trafficking policy. Employees are educated on the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

8: Further actions and sign-off

Following the review of our actions this financial year to prevent slavery and human trafficking from occurring in our business or supply chains, we have taken the following steps to help tackle slavery and human trafficking:

- Awareness communications making use of several platforms (email, TV screens, posters, our global intranet, WISE, face to face briefings)
- Sharing information on our global information sharing system known as Wise
- Policy and knowledge workbook enhanced with annual refresher sessions progressed by all employees
- Whistleblowing Policy reviewed and updated with increased focus on Modern Slavery and reporting of any concerns of risks identified
- Appoint of Procurement Management with higher focus on modern slavery risks in supply chain
- New supplier onboarding process with enhanced due diligence checks
- Ensuring salary payments are paid to appropriate named accounts
- Training during induction and onboarding for all employees
- HRIS houses all the documentation and creates tasks which requires employees to complete for compliance purposes
- Appropriate warranties embedded in our commercial contracts with suppliers

This statement is made in accordance with the Modern Slavery Act 2015 and Human Trafficking and Exploitation Act 2015.

Signed:

People Director

G Carpbell.

Webhelp UK Region

20th March 2019

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