

# Anti-Slavery and Human Trafficking Statement

## 1: Opening statement from senior management

Webhelp UK 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 UK 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").

Our values are embedded in all of our Webhelp UK processes, engagements with our clients and suppliers. We trust these values to be the building blocks of treating all our people, clients and suppliers fairly, 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 2016 – December 2016.

## 2: Structure of the organisation

Webhelp UK is a customer experience outsourcing company in the Business Process Outsourcing sector. It is part of the wider Webhelp Group, which employs more than 35,000 people in 90 different locations across 26 countries. To find out more about the nature of our business, please click [Webhelp](#).

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 who are largely based in the United Kingdom.

## 3: Policies

As part of our commitment to combating modern slavery, we have implemented the following policies:

- Anti-Slavery and Human Trafficking Policy
- Code of Conduct and Business Ethics
- Anti-Bribery and Ethics Policy
- Webhelp UK Supply Chain Management 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 2017 and beyond. It has been identified that the majority of our suppliers supply services rather than goods to our business. Coupled with the extensive legislative framework in place in the United Kingdom and noting this is where the majority of our suppliers are based, we consider the risk of infringement of the Act to be low. Continuing to manage and develop our procurement process is key to ensuring 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
- Vetting of candidates joining the business
- Supplier contracted vetting

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chain
- monitor potential risk areas in our business and supply chain
- reduce the risk of slavery and human trafficking occurring in our business and supply chain
- provide adequate protection for whistleblowers

## 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 UK follows many processes to ensure adherence to the Act. Webhelp UK is ISO certified and as such independent checks and audits are completed by an external body. These audits cover supplier management and internal recruitment.

## 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 key 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. Relevant 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

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our business and supply chains, in order to promote the correct workplace culture across all of our employees in the workplace.

## 8: Further actions and sign-off

Following the review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to help tackle slavery and human trafficking, featuring the subject of slavery and human trafficking in a proportionate and measured way:

- Awareness communications
- Sharing information on our global information sharing system known as Wise
- Communications plan making use of several platforms (email, TV screens, posters, our global intranet, WISE, face to face briefings)
- Policy and knowledge workbook to be completed by all relevant employees
- Annual refreshers on our policy and knowledge workbook
- Training during induction and onboarding for relevant employees
- HRIS houses all the documentation and creates tasks which requires employees to complete for compliance purposes
- Appropriate warranties from suppliers embedded in our commercial contracts with suppliers
- Continued compliance training for those involved in commercial arrangements with suppliers and who can ensure our risk in our supply chain is minimized.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Webhelp UK's slavery and human trafficking statement for the financial year commencing January 2016 and ending December 2016.

Signature:



Chief Executive

Webhelp UK

Date: 14<sup>th</sup> July 2017

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