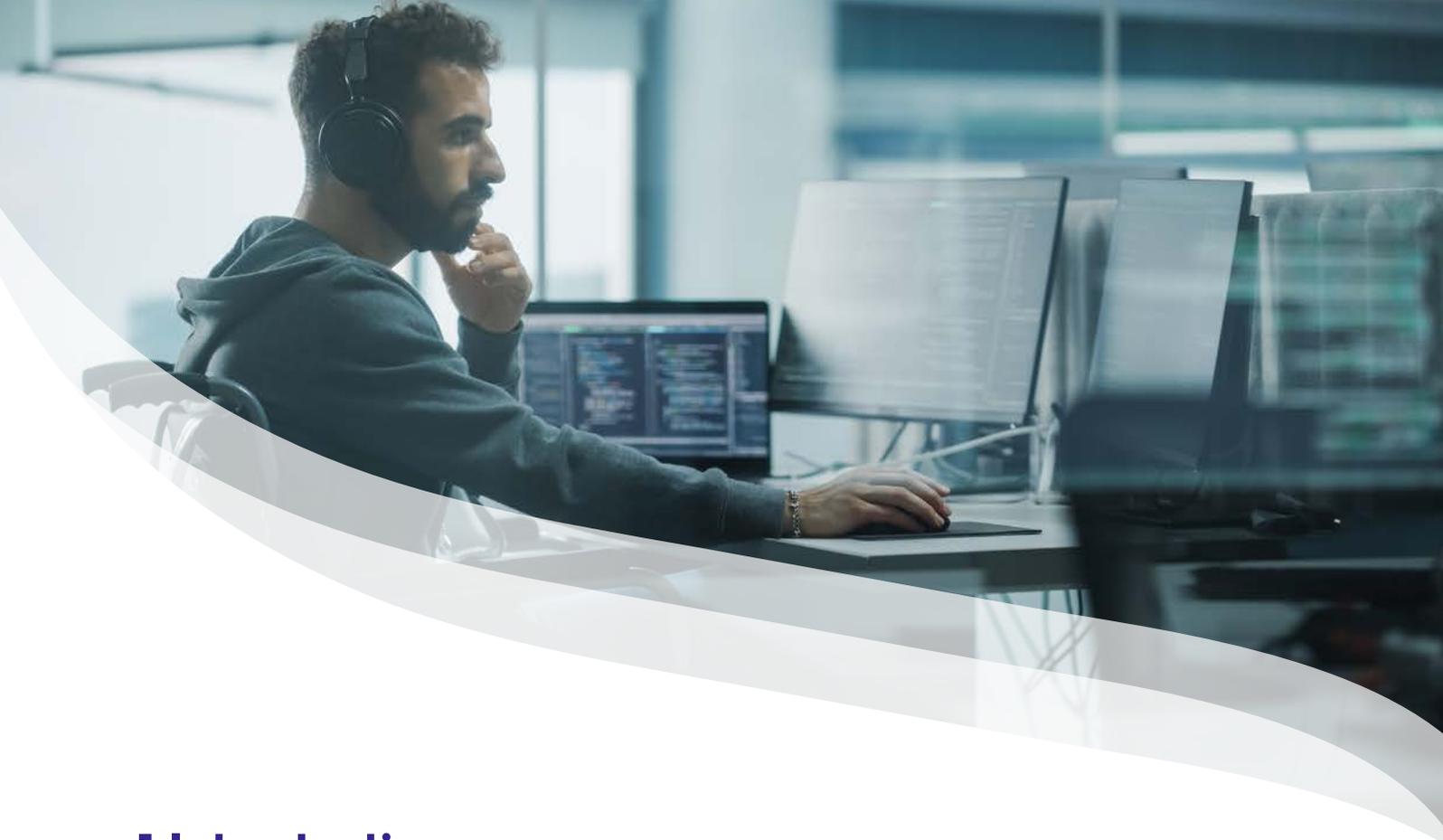




# Modern Slavery Statement

2022 - 2023



## 1 Introduction

Modern slavery remains prevalent across the world and given the hidden nature of the crime it is almost impossible to understand the full scope and scale of the issue.

At Shared Services Connected Ltd (SSCL) we have a responsibility to ensure that there is no modern slavery or human trafficking in our own business and our supply chain. This statement outlines the policies and processes and sets out the actions we have taken to understand potential risks to our business from modern slavery. The statement relates to the financial year ending 31 December 2022, and is in accordance with national laws.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities and in our supply chain.

## 2 Organisational Structure and Supply Chains

SSCL was founded in 2013 to provide business support services for Government, Defence and Police clients in the UK public sector.

Sopra Steria is a European leader in consulting, digital services, and software development, and helps clients drive their digital transformation to obtain tangible and sustainable benefits.

Together, we are proud to be a signatory to the United Nations Global Compact, including Principle Four: Labour, and we align with the UN Sustainable Development Goals, including Goal 8 - Decent work and economic growth.

To ensure that we are aligned with the company's values for an ethical business, we annually assess ourselves using the EcoVadis Corporate Social Responsibility (CSR) assessment. This allows us to benchmark ourselves against

our competitors. We have received a Platinum award, for the third year in a row, progressing from an "Advanced" score to "Outstanding", ranking us in the top 1% of companies assessed against the 21 different sustainability criteria, including our response to modern slavery.

This statement covers the activities of SSCL whose registered office is Three Cherry Trees Lane, Hemel Hempstead, Hertfordshire HP2 7AH in the UK. SSCL employee 3,000 people at six Centres of Excellence located across the UK, plus several smaller offices also in the UK. Our supply chain primarily comprises of organisations within the UK and Europe.

# 3 SSCL's Approach to Preventing Slavery and Human Trafficking

## 3.1 Relevant Policies

SSCL is aligned to the following Sopra Steria policies, and we apply SSCL-specific policies where appropriate. These policies define the steps we have taken to prevent modern slavery and human trafficking in our operations and supply chain. In the last financial year we updated our Sustainable Procurement Policy and our Diversity and Inclusion Policy.



### Code of Ethics

Underpins our approach to transparency fairness and loyalty towards our customers, employees, suppliers, and others in wider society. The Code of Ethics is aligned to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour. Sopra Steria provides all employees with access to a whistleblowing process enabling them to report concerns that are contrary to this code including breaches of human rights and human trafficking.



### Sustainable Procurement Policy

This policy applies to all procurement activities in the UK and requires we adhere to social and ethical standards, and human and labour standards in the procurement of goods and services. Our standard terms and conditions for our suppliers also requires them to uphold human and labour rights and (in the UK) to prevent slavery and human trafficking in their own operations and their supply chains.



### Sustainability Policy

Applicable to all employees, this policy explicitly commits us to preventing slavery. It also requires us to uphold human and labour rights.



### Policy for Recruitment and Selection

We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency and all candidates must go through a verified right to work check. In the UK, a requirement to comply with the Modern Slavery Act 2015 is contained in our supplier contracts.



### Equal Opportunities and Diversity Policy

Our commitment to establishing and maintaining a working environment which is free from discrimination, and which values all employees as individuals.

## 3.2 Due Diligence: Processes and Practices

### 3.2.1 Within our own operations

SSCL is committed to preventing modern slavery and human trafficking and has policies and processes in place to ensure that our employees are not being exploited and that they have a safe and supportive working environment.

To support this, we have taken the following steps:

- All employees have a contract of employment that sets out the rights and obligations arising from their employment, including the notice period needed for them to terminate the contract and leave our employment. Employees are free to serve notice at any time.
- We carry out verification of an employee's identity and ongoing right to work in the UK.
- We do not withhold any employee's identity documents or passport during their employment.
- We comply with and exceed all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks and periods.
- We respect the right of individual employees to join a trade union and, where groups of employees elect to be represented by a trade union, we are committed to engaging with trade unions in pursuit of harmonious industrial relations.
- We have communications campaigns and modern slavery training to ensure employees are aware of their rights and how to spot and report signs of modern slavery.

In addition to the above, we have also taken the following steps:

- We have worked with (through Sopra Steria) both Tech UK and the BSA where they are engaged with the Home Office to obtain input into potential changes to Modern Slavery legislation as well as peer to peer reviews on participants' Modern Slavery Statements. We also attend Cabinet Office workshops to discuss how we might better engage suppliers on preventing Modern Slavery.
- We are a real Living Wage accredited organisation and pay all employees the Real Living Wage, including those employed by our Property and Facilities providers. We also encourage our third-party suppliers to be Living Wage employers.
- Any suspected cases of modern slavery or human trafficking can be raised by an employee, using the procedures outlined above. To date we have not had any instances of an employee reporting a suspected case of modern slavery within our company.



## 3.2.2 Within our supply chain

We recognise that our supply chain contributes the greatest risks for modern slavery and human trafficking and our relationship with the supply base is a critical part of our commitment to eliminating modern slavery.

We annually procure more than £98m of goods and services through our supply chain, of which 98% is with organisations in the UK, 1% with companies within the European Union and North America and less than 1% from the Rest of the World.

We ensure that during all stages of the procurement life cycle we consider modern slavery risks. If there is a suspected case of modern slavery, we will ensure that the correct procedures are taken, and the victims are supported. We will work with suppliers through our policies and contracts, and deal with any issues on a case-by-case basis.

Key categories of spend comprise:

- IT and Telecom equipment.
- Consultancy and Contractors.

We undertake robust due diligence when taking on all new suppliers, and regularly review our existing supply chain.

Our supply chain engagement programme for all suppliers on modern slavery includes:

- A sustainability assessment for every new supplier during the on-boarding process which includes acceptance of our Supplier Code of Conduct. This prohibits slavery and human trafficking and requires them to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains, as well requesting the provision of evidence of their sustainability processes and policies that support this goal.
- Working with suppliers, informing them of best practice, providing advice and guidance on their approach and working with them on implementing action plans for improvements. We also provide additional guidance for SMEs to support the development of their own modern slavery statements.
- Invoking sanctions. No standard process is followed if there is a suspected case of modern slavery in our supply chain. We will work with our suppliers to investigate and ensure the correct procedures to be followed within a given time. If these standards are not met, we will then investigate the termination of business relationships or contracts with suppliers that fail to improve their performance in line with an action plan or where our agreed terms of trading have been breached.

- Reviewing the risks of modern slavery during all stages of the procurement process including tender evaluation, contract award and in-life contract management.
- Becoming a signatory of the Prompt Payment Code which sets standards for payment best practice and reduces the risk of late and extended payments, in turn reducing the pressures on suppliers that could lead to modern slavery. We currently pay 98% suppliers in accordance with its principles.
- Continually monitoring our Supplier Code of Conduct to ensure that it is relevant and contains clear obligations for our suppliers concerning prevention of modern slavery and reporting compliance to the code back to our parent Group monthly.

In this financial year we have:

- Implemented electronic invoicing to all suppliers. This will help to improve the payment process and help us achieve our goal to pay all suppliers to terms.
- Added our Statement to the Government Modern Slavery Statement Registry to ensure complete transparency of our operations.
- Joined the Sopra Steria Social Value Steering Board which has executive management sponsorship and comprises senior representatives from across the business focusing on creating a lasting benefit to for our colleagues, clients, our supply chain, and communities in which we operate.
- Engaged with STOP THE TRAFFIK to discuss training needs and plan for training later in 2023. They have carried out an assessment of the inherent modern slavery risk of a targeted list of our suppliers to help us to identify increased risk of slavery and human trafficking. A number of recommendations have come out of this assessment which will be addressed during the next financial year.
- Increased corporate communications for employees, with specific guidance on handling suspected case of modern slavery.
- Increased roll out of employee training across the organisation.

We are continually making improvements to our ongoing monitoring and assessments of suppliers and work closely with key suppliers to share best practice and provide opportunities to build open discussions and improve existing safeguards.



### 3.3 Training and Awareness Building

We know how vital it is that our employees understand the issue of modern slavery and can recognise the signs and report potential instances in our supply chain.

- Role specific training sessions for employees who have engagement with suppliers such as the Procurement and Facilities Teams, to help them understand the risks of human trafficking and how to spot potential dangers through both the initial supplier on boarding process and subsequent supplier reviews and assessments.
- We have a mandatory modern slavery training module in place which is compulsory for all employees and new starters. We also have refresher training in place to ensure focus and awareness.
- We will be engaging STOP THE TRAFFIK later in 2023 to deliver modern slavery training to specific employee groups across SSCL.

## 4 Performance Targets

We have in place the following key performance indicators (KPIs) and these indicators and activities are reviewed at least annually.

#### Supplier engagement:

- 100% of our suppliers to have agreed to the Supplier Code of Conduct.
- 100% of annually targeted suppliers have completed the EcoVadis sustainability assessment.

#### Modern Slavery Training:

- Ensure that 100% of all existing and new employees, and contractors complete the compulsory modern slavery training.
- Ensure that 100% of employees who have roles dealing with suppliers, such as the Procurement Team receive ongoing updates and notifications regarding business & human rights, and specifically modern slavery.



## 5 Responsibility

Responsibility for activities related to modern slavery and human trafficking are as follows.

### 5.1 Policies:

Responsibility for policies:

- Human Resources – Director of Human Resources, Sopra Steria Limited, for policies related to the prevention of modern slavery and human trafficking in our own operations.
- Chairman Sopra Steria Group SA (France), for the Sopra Steria Group Code of Ethics.
- Procurement – Head of Procurement, Sopra Steria Limited, for policies related to the prevention of slavery and human trafficking in our supply chain.

### 5.2 Due Diligence:

In SSCL the Human Resources team are responsible for ensuring that all due diligence checks are undertaken during all the stages of employment, from initial recruitment onward.

In our Procurement and Supply Chain management activities, our Procurement Management team are responsible for undertaking due diligence activities, and for such activities related to modern slavery and human trafficking they receive input from other parts of the business, including Legal, HR and Sustainability.

## 6 Board Approval

SSCL's Board of Directors has approved this statement for the Financial Year ending on 31 December 2022.

Director's signature:

Director's name: **David Morris**

Date: **June 2023**

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