

Property of Foundever™

Statement

Modern Slavery Act Statement

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Modern Slavery Act Statement

Foundever has developed this statement in compliance with the U.K. Modern Slavery Act 2015, Australian Commonwealth Modern Slavery Act 2018, the French Corporate Duty of Vigilance Act and the German Supply Chain Act. Offences under these acts include slavery, bonded, forced or compulsory labour, human trafficking, criminal exploitation, sexual exploitation, and domestic servitude as well as discrimination. This Statement outlines our commitment to preventing slavery across our company and throughout our supply chain. Foundever strives to ensure that our workplace and those of our suppliers are free from slavery and exploitation. Nevertheless, we have a zero-tolerance approach to slavery in our business and supply chain, enforced through strict global policies and procedures.

This statement discusses the steps we have taken to prevent slavery or human trafficking within our organization or supply chains and the progress we have made. This statement reflects the 2023 financial year from January 1, 2023 to December 31, 2023.

Our commitment to embed and advance respect for human rights covers activities under our full, direct control within our entities, supply chain and affiliates. We are also committed to undertaking ongoing assessment of potential risks arising from such activities to identify, address and resolve adverse impacts, to prioritize our most significant human rights issues and to be transparent in this regard. Furthermore, we are committed to engaging with key stakeholders and to working proactively, both within and outside our industry, to collectively focus on human rights issues and make every effort to progress respect for human rights throughout our industry and beyond.



Karl Brough

General Manager UKI & South Africa, **Foundever**

1. Our company

Foundever® is a global leader in the customer experience (CX) industry. With 150,000 associates across the globe, we are the team behind the best experiences for +750 of the world's leading and digital-first brands. Our innovative CX solutions, technology and expertise are designed to support operational needs for our clients and deliver a seamless experience to customers in the moments that matter.

Supporting +9 million customer conversations every day in +60 languages across 45 countries, Foundever combines global strength and scale with the agile, entrepreneurial approach of our founder-led culture, enabling companies of all sizes and industries to transform their CX.

Foundever Europe Limited, Foundever GB Holdings Limited, Foundever GB Limited, Foundever Operating Corporation Limited, Sitel Solutions UK Limited, Sitel UK Finance, Foundever Global Services Limited (fks Sykes Global Services Limited), Foundever Australia Pty Limited, Foundever Financial Services Pty Limited and Foundever Sydney Pty Limited are indirect wholly-owned subsidiaries of Foundever Worldwide Corporation and members of Foundever Group SA.

As we continue our commitment to promoting ethical business practices, we will ensure our policies and procedures adhere to industry standards and laws enforcing the prevention of slavery and human trafficking throughout our organization and supply chain.

2. Policies

Foundever has adopted the following policies that describe our approach to the identification of human rights and slavery risks and the steps to be taken to prevent slavery and human trafficking in our operations:

Human Rights and Modern Slavery Statement*: Summarises Foundever's commitment to both upholding internationally recognized human rights and progressing respect for human rights throughout our industry and more widely.

Human Rights Policy: Outlines Foundever's responsibilities in support of its commitments to human rights, which include compliance with applicable regulations, advancement of human rights awareness and minimization of human rights risks.

Global Modern Slavery and Child Labour Policy: Contains guidelines, standards, and procedures intended to ensure that Foundever and those acting on our behalf understand and abide by the applicable anti-child labour, anti-human trafficking and anti-modern-day slavery laws, rules, and regulations.

Global Corporate Social Responsibility Statement: Recognizes Foundever's commitment to act responsibly, ethically and with integrity in our interactions with all stakeholders be they our associates, clients, suppliers, or the communities and environment in which Foundever operates.

Global Code of Conduct and Ethics*: Outlines the principles that guide our business dealings, communications and conduct. These principles are incorporated into or referenced in many Foundever

policies and make clear to associates the actions and behaviour expected of them when representing Foundever. Foundever conducts business with integrity, in accordance with the highest ethical standards, in compliance with all applicable laws and regulations, and respects accepted international standard for human rights.

Supplier Code of Conduct and Ethics*: Suppliers are an integral part of our success, and we expect the same commitment from suppliers as we do from ourselves. Foundever expects suppliers to comply with our Supplier Code of Conduct principles and, in turn, to apply those to the supplier's own vendors which deliver goods and services for Foundever.

Global Corporate Social Responsibility Policy: As a complement to Foundever's Code of Conduct and Ethics, we have adopted a Corporate Social Responsibility policy. This documents our commitment to best practices in the area of CSR and compliance with all applicable work and labor legislation in the operation of our business as well as with prevailing international human rights practices.

Global Procurement Policy: Establishes that Foundever's procurement decisions will take into account not only price, quality and reliability of service, but also how potential suppliers treat the people, communities, and environment in their sphere of influence. Foundever vendors commit to comply with all requirements passed through by Foundever clients and with any Foundever Corporate Social Responsibility requirements or policies as they are adopted and communicated to vendors.

Global Associate Recruitment and Selection Policy: Sets out Foundever's robust recruitment processes which ensure compliance with legal obligations and promote equal opportunity.

Global Anti-Bribery and Corruption Policy*: Provides guidance around ensuring a consistent approach with the highest standards of integrity and internationally recognized business ethics.

Global Background Investigation Policy: Sets out our requirement for identity validation and right to work authorization.

Global Security, Privacy and Ethics Incident Management Policy: Contains our security, privacy and ethics incidents reporting mechanisms, including the confidential third-party reporting service EthicsPoint, and the provision of an option for anonymous reporting (following local legislation and restrictions).

Policies are reviewed regularly and are accessible to all associates via our company intranet. Policies marked with an * are accessible externally via our website foundever.com and by following the above links.

3. Risk Management program

We recognize that across the customer experience (CX) industry and as a global business process outsourcer (BPO), risk regarding modern slavery may arise from the scale and reach of our operations across the world, from a significant proportion of our associates having a remote work modality, and from the pace of change and growth inherent to our industry.

The objective of our risk management program is to identify and analyze the risks that the company faces and set appropriate risk mitigation policies and controls. Program scope includes all products, services, networks, infrastructures, departments, associates, locations and business interests worldwide, and applies to all associates of Foundever and associates of its third parties engaged in supporting the business. We ensure a close alignment of the risk strategy and business strategy by the

fact that business decisions made to achieve our targets are taken within the determined ESG risk appetite and in line with the risk strategy.

4. Supply chains

Foundever strives to maintain the highest standards of employee conduct and ethical behaviour. In all our dealings with suppliers, we strive to ensure that the highest ethical standards are always reached. We have adopted policies to address workplace issues such as unfair working hours, child labour, forced labour, non-discrimination, freedom of association, health and safety and environmental sustainability. These policies apply to our own business, and we encourage businesses throughout our supply chain to adopt and enforce similar policies in their own operations. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labor.

Foundever may terminate its relationship with third parties if they do not comply with this Policy.

New suppliers

Through our onboarding process of new suppliers, suppliers are required to complete Non-Disclosure Agreements (NDA), environmental and social surveys, and risk assessments on topics such as anti-bribery and corruption, human rights, environmental, modern slavery, etc. Based on the completion of the questions and risk assessments, suppliers will be given a rating. This rating will aid in our decisions to work with socially responsible organizations.

Existing suppliers

Risk assessments are to be completed on an annual basis, prioritizing high-risk suppliers such as vendors that deliver specific goods or handle digital data, physical data or access our brick-and-mortar locations.

Remediation actions and/or escalations

Foundever will deploy an escalation plan to address high-risk suppliers identified in the risk assessments.

5. Training and communication

Foundever continues to raise awareness of slavery and human trafficking issues within our Global Code of Conduct and Ethics. This Global Code of Conduct and Ethics explains to staff how employers can identify and prevent slavery and human trafficking; and what associates can do to flag up potential slavery or human trafficking issues to the relevant parties within the organization. All Foundever associates are asked to enrol in the Global Code of Conduct and Ethics each year as an additional measure of prevention related to unethical behaviours.

6. Recruitment

Foundever has implemented responsible recruiting practices. Prior to hire, all applicants are required to provide proof of identity for employment verification and to agree to the Global Code of Conduct and Ethics Policy upon hire.

Our suppliers must protect the human rights of their employees and treat their employees in a fair and equal manner free of discrimination. We work with our suppliers based on a proactive approach to ensure slavery and human trafficking risks are identified and managed. Suppliers are expected to support ethical recruitment, hiring workers lawfully and offering transparency throughout the hiring process.

7. Reporting mechanisms

Associates and those covered by this policy have a responsibility to prevent actions that may damage Foundever's reputation and business and to avoid complicity in any human rights abuses. All concerns about any issue or suspicion of child labor, modern slavery or human trafficking in any part of our business or supply chain must be reported at the earliest possible stage.

Questions should be referred to management, Human Resources, or the Legal Department. Actual or potential violations of this Policy or applicable law or questionable conduct may be reported to the employee's direct supervisor, another member of management, Human Resources, or the Legal Department. Concerns also may be reported via the Foundever Ethics Hotline (+1 800.245.2514 within the United States) or [EthicsPoint](#), which is answered by an independent company and is available 24 hours a day, every day. Local toll-free numbers may be found at [EthicsPoint](#) for calls outside the United States.

Reports may be submitted anonymously where permitted by law.

Foundever strictly prohibits retaliation against any person for making a report in good faith or cooperating in an investigation.

8. Making progress

Foundever is committed to engaging with key stakeholders and to working proactively, both within and outside our industry, to collectively focus on human rights issues.

Key performance indicators

We will devise and monitor key performance indicators (KPIs) to:

- reduce the risk of modern slavery and labor exploitation
- increase awareness to all stakeholders (clients, associates, supply chain, communities and shareholders)
- adopt and continuously improve practices that reduce or prevent violations occurring

We expect to take the following actions:

- Continue to identify and map priority risk activities and locations
- Improve global training module and associated KPI targeting associates in roles which have decision-making authority on procurement and people strategies and processes
- Drive engagement in information-sharing and awareness-raising for suppliers
- Continue monitoring and reporting on forced labor-related reports through our EthicsPoint process

