

Statement

Foundever UK Modern Slavery and Human Trafficking Statement

Reporting period: 1 January 2025 to
31 December 2025

Issue date: 18 May 2026

Table of Contents

1.	Our company.....	4
2.	Policies.....	4
3.	Risk management	5
4.	Supply chains	6
5.	Training and communication	6
6.	Recruitment	7
7.	Reporting mechanisms.....	7
8.	Making progress	8
9.	Priorities for 2026	8
10.	Key Performance Indicators (KPIs)	8

Modern Slavery Act 2015 Statement (UK)

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps Foundever has taken during the financial year 1 January 2025 to 31 December 2025 to help prevent modern slavery and human trafficking in our business and supply chains.

Modern slavery can take many forms, including slavery, servitude, forced or compulsory labour, bonded labour, human trafficking and related forms of exploitation such as domestic servitude and criminal exploitation. Foundever is committed to respecting human rights and maintains a zero-tolerance approach to modern slavery. We expect the same standards from our suppliers and business partners and work with them to promote ethical and responsible practices.

Our approach includes risk assessment, proportionate due diligence, and controls designed to identify and address potential modern slavery risks. Where concerns are identified, we aim to respond promptly, including by taking remedial action and working with relevant parties to support effective outcomes. We also seek to be transparent about our progress and to strengthen respect for human rights across our operations and wider value chain.

Signed:

Signed by:

90CF63625901485...

David Grimes
SVP, Global General Counsel
For and on behalf of Foundever GB Holdings Limited
Date: 18 May 2026

A link to this statement is available at: <https://foundever.com/about/esg/>

1. Our company

Foundever® is a global leader in the customer experience (CX) industry. With 130,000 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.

This statement is published on behalf of Foundever GB Holdings Limited and its UK subsidiary undertakings (together, "Foundever UK"), which form part of Foundever Group SA. We are committed to conducting business ethically and to complying with applicable laws and standards intended to prevent modern slavery and human trafficking within our operations and supply chains.

2. Policies

Foundever maintains a framework of global policies and standards that support ethical conduct and help prevent modern slavery and human trafficking, including:

Human Rights Statement*: Summarises Foundever's commitment to both upholding internationally recognised 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 minimisation of human rights risks.

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.

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 CSR and compliance with all applicable work and labour legislation in the operation of our business as well as with prevailing international human rights practices.

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.

Vendor 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 Vendor Code of Conduct and Ethics principles and, in turn, to apply those to the supplier's own vendors which deliver goods and services for Foundever.

Procurement Policy: Establishes that Foundever's procurement decisions will consider 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.

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

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

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

Security, Fraud, 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.

3. Risk management

Foundever recognises 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 and supply chains across the world and from the pace of change and growth inherent to our industry.

We take a risk-based approach to modern slavery, which includes:

- identifying and assessing risk areas within our operations and supply chain
- applying proportionate due diligence and controls based on assessed risk
- escalating and investigating concerns through established reporting and incident management processes
- tracking actions and outcomes to support continuous improvement

Our 2025 risk management exercise rated our modern slavery risk in the UK as low.

4. Supply chains

Foundever's suppliers are an important part of our success. We expect our suppliers to conduct their business with the same commitment to ethical business practices as Foundever.

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 in order to recruit and hire workers ethically and lawfully, provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

Due diligence for suppliers

All potential new suppliers are required to complete a vendor due diligence questionnaire that includes ethical business and labour topics. Where responses are incomplete, do not meet our requirements, or indicate elevated risk, suppliers may be excluded from tender processes and/or subject to additional review.

During onboarding, suppliers accept Foundever's Terms of Business and relevant standards, including obligations and expectations aligned to our Vendor Code of Conduct and Ethics. All suppliers are bound by confidentiality obligations.

Ongoing monitoring

Supplier re-verification is carried out at contract renewal and/or where concerns are escalated.

Remediation and escalation

Foundever will investigate allegations or indicators of modern slavery involving suppliers. Where issues are identified, we may require corrective actions and timelines, and we may suspend or terminate the relationship if standards are not met or remediation is not achieved.

5. Training and communication

Foundever continues to raise awareness of modern slavery and human rights responsibilities through our Code of Conduct and related policies. Training and communications during the reporting period included:

- Provision of the Global Code of Conduct and other policies for review and acknowledgement
- Training on specific ethical business practice topics for relevant roles
- Training on policies and effective people management for line managers

- Information and awareness raising communications marking key calendar events for all associates

6. Recruitment

Foundever implements responsible recruiting practices.

The Foundever global operating standard sets out processes and procedures for hiring designed to deliver a positive candidate experience through respectful treatment and transparent recruitment processes, support diverse and inclusive resourcing, and create a successful and sustainable business environment that values and respects all our employees. Performance to the global operating standard requirements is reviewed regularly.

We carry out appropriate pre-employment checks, including verification of identity and right to work, in line with legal requirements. Associates are required to acknowledge the Global Code of Conduct and Ethics at the time of onboarding.

7. Reporting mechanisms

Associates and those covered by our policies 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 labour, 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 may also be reported via **EthicsPoint**, Foundever's confidential third-party reporting service, available 24 hours a day, every day, by telephone or online.

The EthicsPoint process is a global service and accessible in various languages; it is available to suppliers and other external stakeholders via our homepage.

Reports may be submitted anonymously where permitted by law. Foundever prohibits retaliation against anyone who raises a concern in good faith or cooperates in an investigation.

No modern slavery concerns were reported or found in the UK in 2025; this is based on EthicsPoint monitoring, employee questionnaire feedback and supplier review activity undertaken in 2025.

8. Making progress

Foundever's ongoing commitment to responsible business practices is outlined in our annual ESG report: foundever.com/about/esg/.

Progress in 2025

In 2025, Foundever strengthened its modern slavery programme by completing a UK modern slavery risk mapping exercise designed to provide a clear, auditable evidence base for this statement and to inform targeted improvement actions.

The exercise assessed environmental, human rights and health and safety risks across internal and third-party stakeholders, considering likelihood, impact and existing mitigations. The scope included the UK along with the Philippines and South Africa as two important operational locations, and incorporated: (i) an employee questionnaire, (ii) review of EthicsPoint reporting for human rights concerns, and (iii) supplier review activity combining desktop research and an ESG/ethical business questionnaire issued to selected vendors based on spend and commodity category.

The results and recommendations were reviewed with leadership and used to shape our 2026 priorities, action plan and KPIs.

9. Priorities for 2026

In 2026, Foundever will continue to strengthen its approach to preventing modern slavery and human trafficking by focusing on four areas:

- Training and awareness: expand role-appropriate awareness and capability building for relevant teams.
- Reporting and oversight: maintain and promote clear speak-up routes, including EthicsPoint, and periodically review trends to identify opportunities to improve.
- Supplier standards and due diligence: reinforce supplier expectations aligned to our Vendor Code of Conduct and continue to enhance our proportionate due diligence activity, following up where needed.
- Governance and continuous improvement: keep our risk assessment approach under regular review and monitor delivery of improvement actions to support ongoing effectiveness.

10. Key Performance Indicators (KPIs)

To support accountability and ongoing improvement, we will monitor a set of programme indicators, including:

- Training completion for relevant roles
- Speak-up monitoring of human rights/modern slavery-related reports via EthicsPoint
- Supplier due diligence coverage across in-scope suppliers
- Timely completion of agreed improvement actions

Oversight of modern slavery risk management is led by the country general manager and maintained through cross-functional leadership engagement, with periodic review of risk mapping outputs, supplier due diligence activity, reporting data and progress against the action plan and KPIs.

