

Statement

# **Modern Slavery Act Statement**

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## Modern Slavery Act Statement

Foundever has developed this statement in compliance with the UK Modern Slavery Act 2015. 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 organisation or supply chains and the progress we have made. This statement reflects the 2024 financial year from January 1, 2024 to December 31, 2024.

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 prioritise 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 140,000 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 relates to Foundever GB Holdings Limited and its subsidiaries, part 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 organisation 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 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.

**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:** Recognises 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 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.

**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.

**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.

**Global 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.

**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 recognised business ethics.

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

**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](https://foundever.com).

### 3. Risk management

It is important to understand the nature of our ESG impacts, risks and opportunities, to identify them, quantify them, and thereafter manage and mitigate them. This begins with establishing a comprehensive understanding of all the ways these factors apply to our business.

Foundever recognise 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, from a significant proportion of our associates having a remote work modality, and from the pace of change and growth inherent to our industry.

### 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.

### **New suppliers**

All potential new suppliers are required to complete our vendor due diligence questionnaire incorporating a range of ethical business topics and where this is not returned or quality criteria are not met the vendor will be disqualified from the tender process.

During onboarding Founder Terms of Business are accepted and form an agreement to work to Foundever expectations.

All suppliers are bound by confidentiality obligations.

### **Existing suppliers**

Reverification is carried out at contract renewal and/or upon an escalation.

### **Remediation actions and/or escalations**

Foundever will promptly and thoroughly investigate any claim or indication that a supplier is engaging in activities of modern slavery. If a supplier to Foundever is found in violation of this policy, Foundever will take prompt, remedial measures to address the violation.

Foundever may terminate its relationship with third parties engaged with it if they do not comply with these standards.

## **5. Training and communication**

Foundever continue to raise awareness of slavery and human trafficking issues within our Global Code of Conduct and Ethics. This Global Code of Conduct and Ethics also sets out the responsibility of each associate to report known or suspected human rights violations to the relevant parties within the organisation and the reporting methods available to do so.

Training and communications to raise awareness of human rights related topics and responsibilities have included:

- Provision of the Global Code of Conduct and other policies for review and acknowledgement
- Training on specific ethical business practice topics for indicative 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 implement 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.

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.

## 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 the [Foundever Ethics Hotline](#) via the telephone or online service which is facilitated by an independent company and is available 24 hours a day, every day. This service is communicated regularly to all associates.

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

Our ongoing commitment to responsible business practices is highlighted through our ESG report published annually and can be found at: [foundever.com/about/esg/](https://foundever.com/about/esg/)

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

We expect to take the following actions in 2025 in respect of tackling modern slavery in our operations and supply chain:

- Strengthen the modern slavery risk management programme to identify, assess, mitigate and monitor risks
- Agree key performance indicators (KPIs) based upon the risk management outputs
- Engage in information-sharing and awareness-raising for suppliers on a range of human rights and other sustainability topics as part of our sustainable procurement activity and aligned with our Vendor Code of Conduct



