

Statement

# Modern Slavery Act Statement

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This document is specific to Foundever’s response under the mandate by the UK Modern Slavery Act 2015. This document allows pages 3-8 to be shared publicly and can be found on our [website](#).

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## Modern Slavery Statement

Foundever has developed this statement to comply with the UK Modern Slavery Act 2015 section 54, Part 6. Offences under the Modern Slavery Act (2015) include slavery, bonded, forced or compulsory labour, human trafficking, criminal exploitation, sexual exploitation, and domestic servitude. 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 2022 financial year from January 1, 2022 to December 31, 2022.

### **Michael Welsh**

*Human Resources Director UK&I*

## 1. Our company

Foundever is one of the world's leading outsourcing providers of customer experience management. We collaborate with some of the best-known global brands to harness the industry's transformation and help consistently deliver outstanding customer experiences. With over 30 years of industry-leading experience, our 80,000 passionate and talented associates support more than 400 clients in 48 languages from 150 facilities strategically located in 27 countries. Foundever UK Limited is an indirect wholly owned subsidiary of Foundever Worldwide Corporation and a member of Foundever.

As we continue our commitment to promote 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. 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 reached at all times. We have adopted policies to address workplace issues such as working hours, child labour, forced labour, non-discrimination, freedom of association, health and safety and the environment. 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 where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

## 3. Policies

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

**Global Anti-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 for ourselves. Foundever expects suppliers to comply with

our Supplier Code of Conduct principles and to in turn apply those to 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 to document our commitment to best practices in the area of CSR and compliance with all applicable work and labour legislation in the operation of our business as well as with prevailing human rights international practices.

**Global Procurement and Vendor Management 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 from time to time adopted and communicated to vendors.

## 4. Procedures and Due Diligence

Our processes include actions to safeguard against human rights abuses in our supply chain, including:

- Foundever's global procurement process requires suppliers to acknowledge compliance with our Supplier Code of Conduct and Ethics, which outlines suppliers' obligations on child labour avoidance, freely chosen employment, fair and dignified treatment of employees and a healthy and safe work environment. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.
- Our standard procurement process is supplemented by our policies, which expand on our expectations and suppliers' obligations on specific topics such as Foundever's Supplier Code of Conduct and Ethics that outlines our prohibition of child labour, harassment, inhumane treatment and any infraction of the law, and our support to voluntary and freely chosen employment.
- All Foundever vendors are appropriately vetted to ensure that they are capable of adhering to Foundever's internal standards. Any security, ethical or suspicious circumstance identified during our vendor assessment processes will be reported by the Vendor Managers and properly investigated.
- Standard supplier contract clauses are included in our supplier agreements requiring compliance with the Act and in pertinent cases, requires more vigilant monitoring of high-risk suppliers.

## 5. Training and communication

Foundever has raised awareness of slavery and human trafficking issues in regular staff communications. These communications explain to staff: the basic principles of the Modern Slavery Act 2015; how employers can identify and prevent slavery and human trafficking; what associates can do to flag up potential slavery or human trafficking issues to the relevant parties within the organization.

All Foundever Associates are required to complete Global Security Awareness Training on an annual basis. For Associates in high-risk roles, we require internal training on our Code of Conduct as an additional measure of prevention related to unethical behaviours.

## 6. Recruitment

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

Foundever strives to support and maintain a healthy and safe workplace. Issues regarding labour can be reported through the EthicsPoint Helpline by calling the number or visiting their website at [www.ethicspoint.com](http://www.ethicspoint.com). The service is available 24 hours a day, seven days a week and allows anonymous reporting. Foundever's confidential reporting procedure includes an ethics hotline, which is answered by an independent company and reports may be submitted anonymously to ensure individuals are comfortable disclosing concerns without fear of reprisal. Foundever strictly prohibits and expects its suppliers to strictly prohibit retaliation against any person for making a report in good faith or cooperating in an investigation.

Foundever encourages all our associates, clients, and other business partners to report any concerns related to the direct activities or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

### **Michael Welsh**

*Human Resources Director UK&I*

