

Modern Slavery Statement

2020 - 2021

SSCL



1.0 Introduction

At Shared Services Connected Limited (SSCL) we recognise our responsibility to ensure that there is no slavery or human trafficking in our own business and across our supply chains.

This statement sets out the actions Shared Services Connected Limited (SSCL) has taken to understand the potential risks to its business from modern slavery and to ensure that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to the financial year ending 31 December 2020.

SSCL is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

2.0 Organisational Structure and Supply Chains

SSCL is a joint venture between the UK Cabinet Office and Sopra Steria Ltd, founded in 2013, and our aim is to deliver £1 billion of savings for government, police and defence clients by 2025.

We have already delivered savings of around £385 million, providing more funds for front line public services.

SSCL provides Finance & Accounting, HR & Payroll, Procurement and Resourcing services as well as specialist client-specific services. Our objective is to redesign and modernise systems and processes in the back office to transform the way these services are delivered - providing better value for our public sector clients and better value for the UK taxpayer.

Sopra Steria is a European leader in digital transformation, providing Consulting, Systems Integration, Software Development and Business Process Services. With 42,000 professionals in over 20 countries Sopra Steria is trusted by leading private and public organisations to deliver successful transformation programmes that address their most complex and critical business challenges.

SSCL's supply chains primarily comprise organisations within the UK or Europe and we do not normally operate outside these countries. SSCL avoids contracting with suppliers or sub-contractors located in geographies where there is a higher risk of slavery and human trafficking than there is in the UK or Europe. However, we recognise that our upstream supply chain may include countries with a higher risk of Modern Slavery or Human Trafficking, and we expect our suppliers to prevent and avoid slavery and human trafficking in their supply chains in higher risk countries. We also recognise that slavery and human trafficking does occur in the UK and Europe.

SSCL is proud to be a signatory to the United Nations Global Compact, including Principle Four: Labour, and it aligns our company to 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, and in 2020 we received a Platinum award, ranking us in the top 1% of companies assessed against the 21 different sustainability criteria, including our response to Modern Slavery.

3.0 SSCL's Approach to Preventing Slavery and Human Trafficking

3.1 Relevant Policies

SSCL is aligned to the following Sopra Steria policies and we will look to put in place SSCL specific policies where appropriate.

The following policies define the steps we have taken to prevent slavery and human trafficking in our operations and supply chain. In the last reporting year, we amended our Sustainability Procurement Policy, and improved our Diversity and Inclusion Policy.



Code of Ethics

Applicable to all SSCL employees. The Code of Ethics describes our commitment to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour.



Sustainable Procurement Policy

SSCL follows the Sopra Steria Sustainable Procurement Policy. Amended in 2020, 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 suppliers to uphold human and labour rights and (in the UK) to prevent slavery and human trafficking in their own operations and their supply chains.



Business Integrity Policy

It is important to SSCL that any fraud, misconduct or wrongdoing by workers or officers of the Company that would threaten the integrity of the business, is reported and properly dealt with. This includes any actions that might raise the risk of slavery or human trafficking. SSCL encourages all employees to raise any concerns that they may have about the conduct of others in their business dealings. This could be on behalf of the Company or about the way in which the business is conducted, using the procedures outlined in this policy.



Sustainability Policy

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



Policy for Recruitment and Selection

SSCL uses only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. In the UK, a requirement to comply with the Modern Slavery Act 2015 is contained in our supplier contracts and existing suppliers will be required to comply on renewal.



Equal Opportunities and Diversity Policy

SSCL's 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

Adherence to relevant employment legislation promotes human rights and largely prevents modern slavery.

SSCL has a responsibility to ensure that workers are not being exploited, that they are safe at work and that relevant employment, health and safety and human rights laws are adhered to. A suspected case of slavery or human trafficking within the Company's own operations should be raised using the procedures outlined in the Business Integrity Policy

SSCL has several policies and processes in place to ensure that SSCL employees are not being exploited and that they have a safe and supportive working environment.

Due Diligence: SSCL takes the following steps to ensure that there is no slavery or human trafficking within our own operations:

- 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.
- SSCL carries out verification of an employee's identity and ongoing right to work in the UK.
- SSCL does not withhold any employee's identity documents or passport during their employment.
- SSCL complies with or provides enhanced versions of 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.
- SSCL respects 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.
- SSCL has introduced a communication and training campaign around Modern Slavery, to make employees aware of their rights and how to spot and report signs of modern slavery.

Furthermore, in the reporting year we have also taken the following steps:

- SSCL has worked with Industry bodies to develop on best practice policies around Modern Slavery, and then we have embedded these into our own policies and activities.
- SSCL has provided free support guidance to SMEs (Small and Medium Enterprises) on how to improve their Modern Slavery statements through consultancy days.
- SSCL is Living Wage accredited, and we voluntarily pay all SSCL employees (including all third-party contractors) at least the Living Wage Foundation wage as a minimum.

A suspected case of Slavery or Human Trafficking would be raised by an employee, using the procedures outlined in the Business Integrity Policy. To date SSCL has not had any instances of an employee reporting a suspected case of modern slavery within our company.





3.2.2 Within our supply chain

SSCL recognises that our supply chain contributes the greatest risks for Slavery and Human Trafficking and as such, our relationship with the supply base is a critical part of our commitment to eliminating modern slavery.

SSCL annually procures around £60m of goods and services through its supply chain, of which 96% is with organisations in the UK, 3% with companies within the European Union and North America and 1% from the rest of the world.

SSCL ensures that during all stages of the procurement life cycle, it considers modern slavery risks. If there is a suspected case of Modern Slavery, SSCL will ensure that the correct procedures are taken, and the victims are supported. SSCL will work with suppliers through its policies and service-level agreements, and deal with any issues on a case-to-case basis.

Key categories of spend comprise:

- IT and Telecom equipment.
- Consultancy and Contractors.

SSCL undertakes robust due diligence when taking on all new suppliers, and we regularly review our existing supply chain.

SSCL's 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 its 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, and the provision of evidence of their sustainability processes and policies.
- 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.
- Invoking sanctions – SSCL has made improvements to its process for sanctions, meaning that no standard process is followed if there is a suspected case of Modern Slavery in its supply chain. We will work with our suppliers to investigate and allow the correct procedures to be followed within a given time. If these standards are not met then, SSCL will then investigate the termination of business relationships or contracts against suppliers that fail to improve their performance in line with an action plan or seriously violate its Terms and Conditions.
- Reviewing modern slavery during all stages of the procurement process including tender evaluation, contract award and in-life contract management.
- Being 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. SSCL has increased its commitment to fulfilling the prompt payment code. We currently pay 97% suppliers in accordance with its principles.
- Implementing clauses around debt bondage (the most common form of modern slavery), into our supplier code of conduct. These clauses prevent forced work to pay off debts.

In the reporting year SSCL has:

- Offered electronic invoicing to all suppliers. This will help to improve the payment process and help us achieve its goal to pay all suppliers to terms.
- Improved access to our Modern Slavery Policy by publishing it on our external website.

SSCL uses a Sustainability Risk Matrix, which covers more than a dozen key sustainability risk areas and determines levels of risk by supply category. Using the Sustainability Risk Matrix, we broadly map the supply chain to assess products or geographical risks of modern slavery and human trafficking. We identify suppliers in categories. Suppliers with higher levels of risk, and those that we maintain spend above a certain threshold. They then participate in our supplier enhanced engagement process, which includes a more thorough assessment of their sustainability management processes, including those for the prevention of slavery and human trafficking.

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 roles dealing 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 suppliers reviews and assessments.
- In 2020 we introduced a Modern Slavery training module which is compulsory for all employees, and all new starters to the company will be asked to complete this as part of their induction process. This training includes Indicators of Forced Labour.

4.0 Performance Indicators

SSCL has introduced the following key performance indicators (KPIs) in response to the introduction of the Modern Slavery Act 2015.

The 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 new suppliers have undergone a sustainability assessment during the on boarding process.

Modern Slavery Training:

- Ensure that 100% of all existing and new SSCL employees, agency workers and contractors complete the compulsory Modern Slavery training.
- Ensure that 100% of SSCL 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.



5.0 Responsibility

Responsibility for SSCL's initiatives addressing Modern Slavery and Human Trafficking are as follows.

5.1. Policies:

Responsibility for policies:

- Human Resources – Director of Human Resources, Shared Services Connected Ltd, for policies related to the prevention of 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 and for the Sustainability Risk Matrix.

5.2. Due Diligence:

In our own operation, 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 slavery and human trafficking, they take input from other parts of the business, including Legal, HR and Sustainability.

6.0 Board Approval

SSCL Board of Directors has approved this statement for the Financial Year ending on 31 March 2021.

Director's signature:

Director's name: **David Morris**

Date: **21 June 2021**

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