

# Modern Slavery Statement 2020

## Introduction

Modern slavery in all its forms of slavery and servitude, forced or compulsory labour and human trafficking is a heinous crime and will not be tolerated within our operations or supply chain. We will take appropriate steps to ensure everyone who works for Right Digital Solutions has their fundamental human rights respected and anyone we do business with upholds these principles. This statement details policies, processes and actions we have taken to ensure that slavery and human trafficking do not take place in our supply chains or our business.

## Our business

We strive to be a truly responsible business and create better outcomes for:

- Our people – by providing an environment in which they can thrive and develop.
- Our clients and customers – by being focused on delighting them, both now and in the future.
- Our suppliers and partners – by treating them fairly and encouraging them to deliver.
- Our investors – by delivering against targeted returns.
- Society – by acting as a responsible business for the communities we serve.

To deliver our purpose successfully, we strive to be transparent, innovative, collaborative and dependable. We believe all associated behaviours must guide all our decisions and actions, each and every day.

**THIS MODERN SLAVERY STATEMENT COVERS THE ACTIVITIES OF ALL BUSINESSES IN ALL JURISDICTIONS WITHIN RIGHT DIGITAL SOLUTIONS FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2019, REQUIRED UNDER THE PROVISIONS OF THE MODERN SLAVERY ACT 2015 (THE “ACT”).**

## Our policies in relation to modern slavery

The following policies help us ensure modern slavery is not taking place in our supply chains or business:

- **Human Rights Policy:** ensures appropriate procedures are in place to prevent breaches to international human rights standards, in line with the UN Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) core conventions on Labour Rights, and the Act.
- **Diversity and Inclusion Policy:** ensures we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated.
- **Procurement Policy:** sets out our strategic approach and the key principles and priorities that apply to our procurement activity to ensure we have control over our external expenditure and effectively manage our supply chain risks. The policy is complemented by our Procurement Standard and Supplier Requirements Standard.
- **Supplier Requirements Standard:** sets out our expectations of suppliers in terms of ethical procurement, financial soundness, information technology and data security and governance. It details the due diligence and risk assessment we conduct on all suppliers to ensure compliance to relevant legislation.

All suppliers are expected to comply with our Supplier Requirements Standard. We reserve the right to terminate a relationship with a supplier or third party that cannot demonstrate

compliance or progress towards the eradication of modern slavery within its organisation and supply chain.

Code of Conduct: Our new Code of Conduct will build on, and replace, our Ethical Code, to set out what is expected from every person working for, and with our businesses, anywhere in the world.

These policies are available to all employees via our intranet site and website and managed by relevant senior leaders. Our company-wide risk management framework and reporting processes are being designed to support the escalation and management of any identified issues.

### **Tackling modern slavery – our people**

To ensure we recruit and treat employees fairly, our human resources (HR) policies set out our procedures on how we:

- Recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates.
- Treat all employees fairly during their employment and have in place procedures to raise a grievance or a involve local trade union, where they exist, or where this is a legal requirement to do so, if an employee feels they have been treated unfairly.
- Manage the exit of an employee in a fair and consistent manner.

Our Human Rights Policy details our commitments to labour and workplace rights. We provide fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits.

These are applied according to territory-specific statutory requirements.

The key principles are that:

- Our employees' pay will not be lower than that required by local law or, in the absence of a law, the level paid generally within that industry.
- Hours of work will be in line with local law or, in the absence of a law, the norm within that industry, and shall not be excessive.
- Employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis. Forced or compulsory labour is prohibited.
- Employees will not be forced into involuntary labour and coercion at work is not acceptable.
- Financial penalty as a disciplinary sanction is prohibited.
- The employment models deployed will be in line with territory-specific law and practices. Under these practices there will not be excessive use of alternative models, such as subcontracting or labour-only contracting.

All employees can raise concerns ('blow the whistle') through our Speak Up Policy, including Concerns about slavery and human trafficking. This Speak Up Policy sets out the channels available to any person who works for, or with, us and employees can raise these concerns openly and at any time in confidence.

We also seek feedback from employees through regular surveys where we gauge how our people feel about working at Right Digital Solutions. This helps leaders and HR teams identify potential issues around culture that could lead to a failure of ethics, controls or governance before they occur. Slavery and human trafficking would be picked up as a potential issue through this assessment.

### **Tackling modern slavery – our supply chain**

We value our business relationships and seek to build lasting relationships, treating our suppliers fairly and paying promptly. We want to work with suppliers who share our values and support us to create better outcomes. We are working with our supply chain to ensure that together we can achieve wider social, economic and environmental benefits.

As a minimum, we expect both ourselves and our suppliers to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and being environmentally responsible where practicable.

Over the past year, we enhanced the questions we ask of all suppliers, in relation to human trafficking and slavery, health and safety, the environment, data protection, information security and bribery to ensure we only partner with suppliers who uphold the same ethical principles as us. Our Supplier Requirements Standard is a key element of our standard terms and conditions and outlines our expectations.

In addition to our supplier due diligence questions we assess our supply chain on sustainability risk (including modern slavery). This year, we partnered with an independent body to analyse our supply chain. We applied a sustainability risk rating based on country of origin and annual expenditure with all suppliers.

Those based in countries with a high risk of modern slavery as defined by The Global Slavery Index and with whom we spend more than £1m annually with were classed as high sustainability risk suppliers.

### **Training and communication**

To make employees aware of the Act and the drivers of modern slavery, as well as the possible indicators, this statement has been shared with all employees through our internal communication channels. It is also available on our website ([www.capita.com](http://www.capita.com)). We are also training our procurement teams in associated due diligence processes.

### **Plans for the next year**

We will continue to strengthen our approach to managing the risk of modern-day slavery within our business and supply chains and:

- Continue to roll out training to procurement teams.
- Increase audits of our high sustainability risk suppliers.
- Work with our high sustainability risk suppliers who have a low audit score to support them to improve their operational performance.
- Launch a Supplier Charter to replace our Supplier Requirements Standard that sets out the open, honest and transparent manner we will conduct business and the behaviours and practices we expect of our suppliers.
- Maintain effective and continued focus on employee awareness of how we expect employees to conduct business responsibly, focusing on treating people fairly and equally, acting lawfully and the process involved to raise ethical concerns.

### **Approvals**

This statement is made pursuant to section 54(1) of the Act, has been approved by the Directors of Right Digital Solutions, and will be updated annually in line with the Modern Slavery Act's reporting requirements.