

Sitel Modern Slavery Act Statement 2018

Sitel has developed this statement to comply with the UK Modern Slavery Act 2015. It outlines our commitment to preventing modern slavery across our company and supply chain.

Sitel strives to ensure that our workplaces and those of our suppliers are free from modern slavery and exploitation. Nevertheless, we have a zero tolerance approach to modern slavery in our business and supply chain, enforced through strict global policies and procedures.

This statement relates to activities during the 2018 financial year.

Our company

Sitel 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 75,000 passionate and talented associates support more than 400 clients in 48 languages from 150 facilities strategically located in 27 countries.

Sitel UK Limited is an indirect wholly owned subsidiary of SITES Worldwide Corporation and a member of the Sitel Group.

Our supply chains

We consider the risk of slavery or human trafficking within our supply chain to be low. In general, our supply chain involves suppliers of facilities management services, interior design and refurbishment, IT and telecoms, temporary staff and professional services. Sitel UK's suppliers are typically based in the UK.

Sitel strives to maintain the highest standards of employee conduct and ethical behaviour. In all of 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.

Our policies

Sitel has adopted the following policies that describe our approach to the identification of modern 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 Sitel 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 Sitel'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 Sitel 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 Sitel policies and make clear to associates the actions and behaviour expected of them when representing Sitel. Sitel 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. Sitel 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 Sitel.
- **Global Corporate Social Responsibility Policy:** As a complement to Sitel'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 Sitel'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. Sitel vendors commit to comply with all requirements passed through by Sitel clients and with any Sitel Corporate Social Responsibility requirements or policies from time to time adopted and communicated to vendors.

Our procedures and due diligence

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

- Sitel'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 Sitel'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.
- Sitel 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. Sitel'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. Sitel 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.
- All matters raised via our ethics hotline or through the auditing processes are diligently investigated and appropriate action is taken in accordance with our compliance standards.
- All Sitel vendors are appropriately vetted to ensure that they are capable of adhering to Sitel'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.
- We regularly conduct internal training on our Code of Conduct and Ethics with our leadership teams.
- Sitel has raised awareness of modern slavery 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 organisation; and what external help is available, for example through the Modern Slavery Helpline.
- 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.

Karl Brough

General Manager UKI