

# CAPITA

## CAPITA PLC POLICY

### PREVENTION OF MODERN SLAVERY

<b>Classification</b>	<b>PUBLIC</b>
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# 1 POLICY

## 1.1 PURPOSE

1.1.1 The purpose of this Policy is to specify details of Capita's approach to fulfilling its commitment to support the elimination of Modern Slavery and fully meet its obligations under the Modern Slavery Act 2015.

1.1.2 The Policy aims to ensure all Capita businesses take appropriate steps to confirm their and their suppliers to confirm their commitment as we do to the requirements of the Act.

## 1.2 SCOPE

1.2.1 This Policy applies to all businesses in all jurisdictions within the Capita plc group of companies.

1.2.2 The policy applies to [third party suppliers](#) with access to Capita or client property, systems or data, and any other parties working on behalf of Capita.

## 1.3 POLICY STATEMENT

1.3.1 Capita plc is committed to supporting the elimination of acts of Modern Slavery and accordingly we acknowledge The Modern Slavery Act 2015. Within our remit, we encourage others to support the following international standards and as such ask our suppliers to confirm their commitment as we do to the:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Core Conventions of the International Labour Organisation

1.3.2 The Board of Capita plc considers that the adherence with this Act is in line with the Corporate Values and Ethical Code which it promotes to all of the businesses within the Group.

## 1.4 POLICY REQUIREMENT

1.4.1 As stated in our Human Rights Policy, which applies to all the Group's businesses, employees, contractors, and sub-contractors, forced or compulsory labour is prohibited.

1.4.2 Employees should not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited.

1.4.3 The employment models deployed across our Group will be in line with territory specific law and practices.

1.4.4 Capita plc is a FTSE listed company and consists of a number of limited company subsidiaries. We provide Business Process Outsourcing services to a mixture of private and public clients. Our supply chain is made up of circa 35,000 suppliers, the majority of which are Small and Medium sized Enterprises (SMEs). Our Group Procurement team will have implemented by the end of March 2016 the CSR Auditing tool Ecovadis to all key suppliers,

which includes The Modern Slavery Act in its annual audits. To enable continued diversity and the presence of SMEs in our supply chain Ecovadis will be rolled out to suppliers who trade over £1M with Capita or are deemed a material risk in the supply chain of products or services, regardless of size. These suppliers are sourced via a robust due diligence process and audited on an ongoing basis by our Group Internal Audit function, incorporated at each stage is a review of the controls undertaken by the supplier.

1.4.5 From 2016 a declaration to confirm support of the Modern Slavery Act 2015 will be contained in our updated supplier contracts and existing suppliers will be required to complete this declaration on renewal.

1.4.6 A robust communications programme will be launched in 2016 to ensure all employees and particularly those with procurement responsibility are aware of their responsibilities.

## **1.5 POLICY EXCEPTION**

1.5.1 This Policy applies across all workers within Capita's businesses. There is no Exception process for this Policy.

## **1.6 RESPONSIBILITIES**

1.6.1 The Group Finance Director is the main board director with primary responsibility for implementing this policy within our wider framework for managing corporate responsibility and for reporting annually to the Group Board. Pursuant to the Modern Slavery Act 2015 we will update and issue this policy (which for the purposes of the Act should be seen as our Statement) annually to confirm the actions taken to ensure that slavery and human trafficking is not taking place in our supply chain or own businesses.

1.6.2 Capita businesses will be required to self-attest on an annual basis their adherence to this Policy and this will be subject to audit and review by Group control functions and/or external auditors.

## **1.7 REPORTING**

1.7.1 Subject to the attestation process described above, compliance with this Act will be reported to the Group Risk & Audit Committee annually.

1.7.2 Formal reporting disclosures required by the Act must be included in the Capita plc Annual Report for the financial year that the report covers.

1.7.3 There may be ad-hoc reporting required for UK Government, Corporate Social Responsibility or other agencies and this will be co-ordinated by the policy owners.

- 1.7.4 Group Procurement will also report non compliance via the Ecovadis platform and take corrective action with relevant suppliers and internal stakeholders.

## 2 DOCUMENT CONTROL

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