

Modern Slavery and Human Trafficking Statement 2025





The information in this statement, signed by our Chief Executive Officer, Adolfo Hernandez, details the policies, processes and actions Capita has taken to mitigate the risk of modern slavery and human trafficking in our supply chains and any part of our own business.

It covers the activities of all businesses in all jurisdictions within the Capita plc group of companies ("Capita") and is Capita's Modern Slavery Statement for the financial year ended 31 December 2024, required under the provisions of the Modern Slavery Act 2015 (the "Act").

Our commitment

Modern slavery is hidden in plain sight and is deeply intertwined with life in every corner of the world. Each day, people are coerced or forced into exploitative situations that they cannot refuse or leave. Each day, we buy the products or use the services they have been forced to make or offer without realising the hidden human cost.

An estimated 50 million people were living in modern slavery on any given day in 2021, an increase of 10 million people since 2016*. We are committed to playing our role by ensuring, through our management and operations that we have the systems, policies and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We apply all the necessary steps to ensure that everyone who works for Capita has a working environment in which their human rights are respected and anyone that we do business with also upholds these principles.

[Visit our Annual Report and Accounts 2024 for more information.](#)

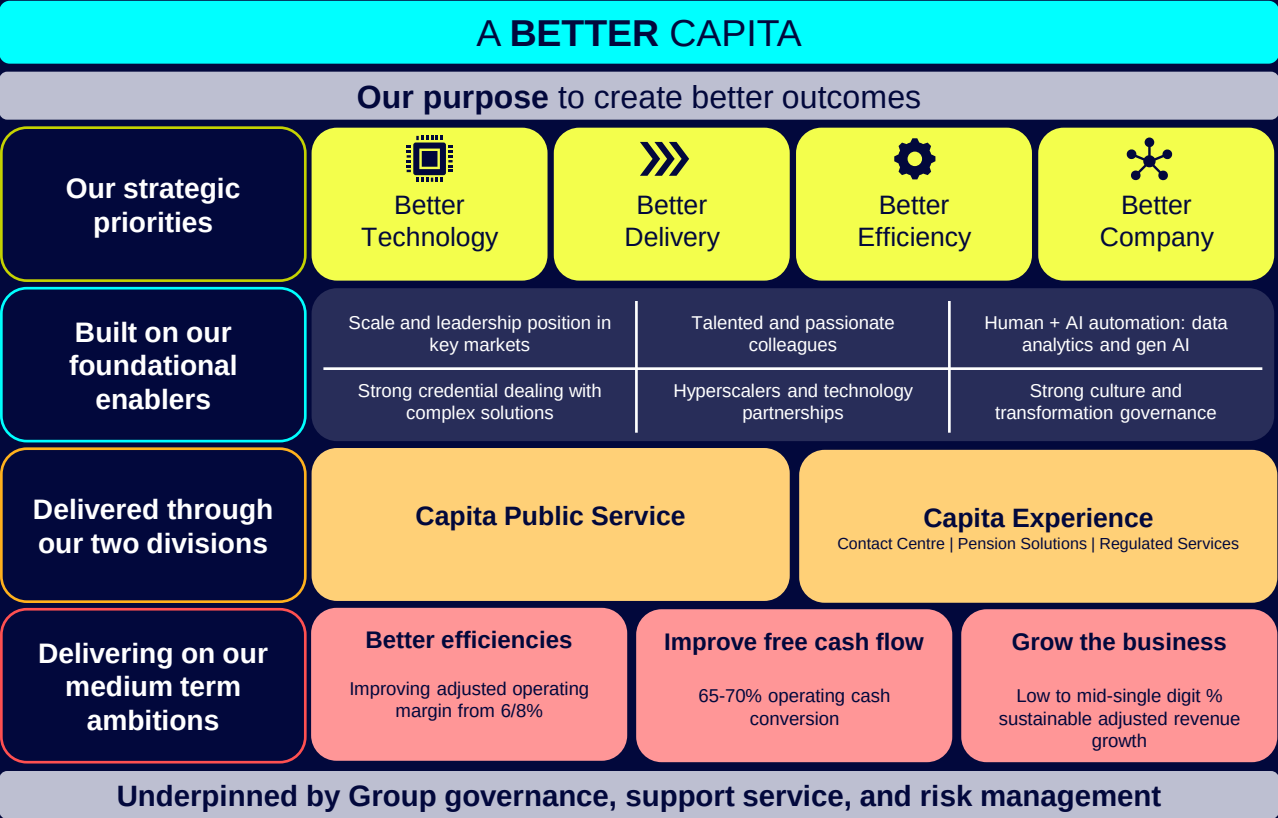
*www.walkfree.org



Our business and structure

Capita is a leading provider of business process services, driven by data, technology and people. Every day our colleagues help millions of people, by delivering innovative, digitally enabled solutions to transform and simplify the connections between government and citizens, businesses and customers.

We partner with clients and provide them with insight and technologies that allow them to focus on what they do best and make peoples’ lives easier and simpler.



We operate across two core divisions – Public Service and Experience – in the UK, Europe, India and South Africa. The divisions are supported by a common set of company-wide capabilities and functions.

Our purpose and values

We are driven by our purpose: to 'create better outcomes' – for our colleagues, clients and customers, suppliers and partners, investors, and society. We strive to create better outcomes by living our values:

- Customer First Always
- Fearless Innovation
- Achieve Together
- Everyone is Valued

We bring these values to life through our day-to-day behaviours and by putting our purpose at the centre of everything we do.



Customer first, always

We prioritise our customers in everything we do, working hard to exceed their expectations with exceptional service.



Fearless **innovation**

We love bold ideas and adopt the best solutions to continuously improve, working at pace to serve our customers and communities better.



Achieve together

We believe in the power of collaboration and being open, working together, holding each other to account to reach our shared goals.



Everyone is **valued**

We create a welcoming and inclusive environment where everyone feels valued and empowered to succeed.

We innovate boldly, to grow better together...

Our stakeholders

Capita's stakeholders include: our people, clients, customers, suppliers and partners, investors, civil society organisations, as well as recruitment agencies and trade unions.

Stakeholder	What matters to them	How we engage with them
Our People	- Flexible working - Learning and development opportunities - Fair pay and benefits linked to performance - Two-way communication and feedback	- People surveys - Regular all-employee communication & network groups - Via Nneka Abulokwe, our designated non-executive director for colleague engagement - Workforce engagement on pay at Capita
Clients and Customers	- High-quality service delivery - Delivery of transformation projects within agreed timeframes - Responsible, ethical and sustainable business credentials	- Regular client meetings, business reviews and surveys - Regular meetings with government stakeholders and annual review with the Cabinet Office - Through our customer advisory boards - Through our senior client partner programme - Introductory meetings and correspondence with the new CEO, and ongoing meetings with Divisional CEOs
Suppliers and Partners	- Transparent and fair procurement processes - Collaboration on joint initiatives that drive innovation and foster long-term partnerships - Reliable and timely payment terms - Shared commitment to sustainability, resilience, and compliance with Science Based Targets Initiative - Provision of a safe working environment with high ethical standards - Partnering with diverse suppliers that bring innovation, disruptive technologies and positively impact local communities - Maintaining resilience, integrity, confidentiality of our business relationships	- Strategic collaboration with hyperscalers, including innovation forums: AWS, Microsoft, Salesforce and ServiceNow focused on co-creating solutions for Capita's clients, integrating advanced AI and cloud capabilities into our offerings - Performance reviews and assessments, to ensure value delivery and alignment with Capita's strategic goals - Sustainability partnerships: collaborating with hyperscalers to assess and mitigate the environmental impact of cloud-based operations, driving DEI and local community initiatives - Engagement reviews: regular supplier meetings, ensuring openness throughout the source to procure process complete with in-life feedback questionnaires and risk assessments
Investors	- Reporting on strategic, operational and responsible business factors - Financial performance - Directors' remuneration - Access to the Board and senior management - Regular communication	- Financial, other business reports and trading updates - Capital Markets Day held in June 2024 - Investor meetings with CEO, CFO and Investor Relations - Dedicated webinars for retail shareholders - Regular investor programme with the Board, including meetings with the Chairman and Remuneration Committee and Audit and Risk Committee chairs and feedback throughout the year - At the Company's AGM, discussions around AGM on resolutions and governance topics - Dedicated Investor Relations contacts and email inbox
Society	- Social mobility, youth skills and jobs - Community engagement - Diversity, Equity and Inclusion - Climate change - Business ethics - Accreditations and benchmarking - Cost of living crisis	- Membership of non-governmental organisations - Charitable and community partnerships - External accreditations and benchmarking - Working with clients, suppliers, and the Cabinet Office
Recruitment Agencies	- Volume and continuity of business - Clear, ethical and efficient processes - Candidate experience and retention - Market insight and collaboration - Competitive commercial terms	- Work with a managed service provider in the UK and multiple partners in other locations - We conduct rigorous due diligence assessment to ensure that the recruitment agencies are recruiting in line with our policies and values, and that they apply inclusive and value-based recruitment practices
Trade Unions	- Employment terms and conditions - Consultation and collective bargaining - Health, Safety, and Wellbeing - Diversity, Equity and Inclusion - Organisational change and restructuring - Training and career development - Ethical and Social Responsibility	- We operate many of our contracts in a unionised environment - We meet with recognised trade unions for example Unison, Communications Workers Union (CWU) and Unite in line with the collective agreements in place, as determined, on a regular basis. Matters for discussion can include business performance, strategy and resolving local issues

Visit our Annual Report and Accounts for more information: [Click here](#)

Our people

As of 31 December 2024, we had a workforce of more than 34,580 colleagues employed in 11 countries. Most of our colleagues work a hybrid schedule or are home-based.

Employee Headcount – 31 December 2024

Headcount per country	Total
Germany	2,956
India	4,847
Ireland	988
Isle of Man	1
Poland	654
South Africa	2,506
Switzerland	1,043
United Arab Emirates	1
Bulgaria	220
Luxemburg	1
United Kingdom	21,367
Total	34,584

Our clients and sectors

We work across a range of sectors, partnering with our clients and providing them with the insight and technologies that allow them to focus on what they do best, making peoples’ lives easier and simpler.

Capita Public Service is the number one strategic supplier of Software and IT Services (SITS) and Business Process Services (BPS) to the UK Government:

-  Local Public Service
-  Central Government
-  Defence & National Preparedness (including Learning)

Capita Experience is one of western Europe’s leading customer experience businesses. It is the market leader in the UK and ranks fourth in Germany and Europe:

-  Contact Centre: Financial Services; Telecoms, Media & Technology; Energy & Utilities; Retail (including charities)
-  Pension Solutions
-  Regulated Services

Our supply chain

With approximately 13,700 suppliers, we recognise that Capita's supply chain is critical to our success and is also our primary risk area. We therefore 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 in delivering our purpose to create better outcomes.

We are committed to working with our supply chain to ensure that together we can achieve wider social, economic and environmental benefits, and safeguarding colleagues, especially those most at risk to labour exploitation, and vulnerable or disadvantaged families who face barriers to sustainable employment and income.

We spent more than £1.65bn in 2024 with 13,651 direct suppliers in 42 countries, 78% of them are based in the United Kingdom. We actively monitor our supply chains against the Walk Free Foundation Global Slavery Index (GSI) who provide national prevalence and vulnerability estimates of modern slavery for 160 countries worldwide. In 2024, we worked with 4 suppliers based within 3 countries classified at high risk (Nigeria, Kuwait and United Arab Emirates).

Annually, we benchmark ourselves against external indices to ensure our approach to responsible business is appropriate for our organisation and in line with industry best practice.

We actively participate in the S&P Global Corporate Sustainability Assessment (CSA), Sustainalytics and EcoVadis. In 2024 our ranking in the CSA increased by 8 points, we scored 53 out of 100 (90th percentile); our scores in the Sustainalytics assessment improved, with our risk rating score decreasing from 18.9 in 2023 to 15.5 in 2024 and we achieved a score of 64 out of 100 in our EcoVadis assessment, earning a good status, which is equivalent to a Bronze Medal.

In 2024, Capita was included in the FTSE4Good Index Series. The Series, by global index and data provider FTSE Russell, is designed to measure the performance of companies demonstrating strong environmental, social and governance (ESG) practices. All indices assess our approach to labour and human rights, which includes our response to modern slavery.

We also partner with organisations which share our values and support responsible business practice, including modern slavery activities. Our memberships include Business in the Community, Purple Space, and the Employers Network for Equality and Inclusion (ENEI). We also support charitable causes such as UnSeen through our partnership with Hands On Payroll Giving.



£1.65bn

Capita spent with suppliers



78%

Of our suppliers based in the UK



13,700

direct suppliers in 42 countries



Governance and policies

Our governance

Our commitment to human rights and the eradication of modern slavery is overseen by our senior leadership team. Overall accountability is held by Capita's Executive Team, which consists of functional chiefs and executive officers who are entirely accountable for their division and function, including Responsible Business, Human Resources and Procurement.

Both Capita's Chief Executive Officer, Adolfo Hernandez, and the Responsible Business Committee have had final sign-off on this Statement.

Our policies

The following company policies support us in mitigating the risks of modern slavery in our business and supply chain. They are available to all colleagues via our colleague hub and website. The policies are managed by relevant functional heads such as People, Procurement and Responsible Business, and are embedded in our company-wide risk management framework.

Code of Conduct >

(the Code) describes what we must do and how we must behave to ensure we have the trust of all our stakeholders. The Code applies to everyone who works at, or with, Capita. It summarises in one place elements of our key policies, and the standards and procedures which support them. All colleagues are required to complete mandatory Code of Conduct training annually.

Human Rights Policy >

Sets out our commitments and ensures appropriate procedures are in place to mitigate the risk of potential breaches of international human rights standards, including the United Nations' Universal Declaration of Human Rights (UDHR), the International Labour Organisation (ILO) core conventions on Labour Rights, and the Modern Slavery Act. The Human Rights policy is referenced within our mandatory Code of Conduct, Diversity and Inclusion, as well as Safeguarding training module.

Diversity and Inclusion Policy >

Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated. Our policy is supported by a mandatory Diversity and Inclusion training module for all colleagues that needs to be taken annually.

Risk Management Policy >

Sets out our commitment to risk management and what we expect from our employees to ensure compliance with the Group Risk Management Standard. Capita applies a risk-based approach to internal controls. This risk-based approach applies to the overall design of the Capita Internal Control Framework and all of its components. It requires Divisions and Functions to understand the relations between the business environment, objectives, risk and performance, and to establish appropriate risk responses to deal with both routine risks and monitor the effectiveness of risk strategies and controls.

Speak Up Policy >

Outlines our commitment to speaking up about serious concerns, explaining how anyone, whether working at or with us (including those employed in our supply chain) or a member of the public, can raise concerns or 'whistle blow' through confidential, responsible, and effective channels, without fear of repercussions. This policy is supported by our Speak Up Standard and a fully anonymised online portal which is promoted and accessible to all, on our website. The portal includes geographically appropriate telephone numbers, run by an independent third party on behalf of Capita. We also run a related 'Disclosure and Whistleblowing' compliance training programme for identified colleagues operating in our regulated areas.

Supplier Charter >

Sets out the principles of how we will conduct business in an open, honest and transparent manner, and the behaviours and practices we expect of all our suppliers and partners. This includes specific reference to our expectations for our suppliers to never use or support practices that inhibit the development of children, not hold an individual nor group in slavery or servitude, not use any form of involuntary labour, nor traffic individuals or groups for the purpose of labour exploitation in line with the Modern Slavery Act. We expect all our suppliers to adhere to our Supplier Charter and to report any issues of compliance with our charter to us within five working days, or any shorter period required by regulation. We expect all our suppliers' colleagues or contractors to report any breaches through their own grievance mechanism, or directly to us.

Anti-racism, Discrimination, Harassment and Bullying Policy >

We have a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment, bullying and all forms of exploitation with a clear reporting and grievance procedure to follow for any reported acts or behaviour that goes against our commitments. Referenced in our Diversity and Inclusion mandatory training module, there is also a mandatory compliance Anti-Racism training module for all UK and Ireland colleagues.

HSE Policy >

Sets out our statement and commitment to health, safety and environment (HSE) and the way we aim to keep our employees safe and well as well as protect the environment. This is supported by the HSE Standard, which captures the roles and responsibilities of everyone across Capita, including arrangements for monitoring HSE. The HSE Management System, documents all the HSE procedures and guidance related to the work that we undertake.

Safeguarding Policy >

Sets out our commitment to safeguarding our colleagues, any other adults at risk or children who come into contact with us, during work related activities. Safeguarding relates to promoting the welfare of adults at risk or children and protecting them from harm. We are committed to providing the necessary training to all colleagues, fulfilling our legal and regulatory requirements, and providing a safe, efficient and confidential process for reporting and managing any safeguarding concerns or issues.

Procurement Policy >

Sets out what our suppliers should expect from us when we buy goods and services and the requirements that must be met by every one of our businesses, in every country where we operate, when doing so. This includes operating responsible business procurement practices with clear and fair procurement processes and paying promptly in accordance with payment terms, monitoring our supply base in accordance with our Supplier Charter and providing a framework for ongoing assurance of business resilience activities with our suppliers.



Risk management

Our principal risks are defined as those risks that we determine to be the most material, which can affect the performance, reputation and operational resilience of our business. We recognise that it is good practice to review our principal risk profile regularly to ensure it remains relevant and in line with our strategic objectives. In 2023, a review of our principal risk profile resulted in the inclusion of a new principal risk regarding Environment, Social and Governance (ESG) matters. A member of the Executive Team was appointed risk owner who has accountability for ensuring that the risk is effectively managed. Supply chain management and due diligence processes are recognised as controls for the assessment and future mitigation of this ESG risk, which continues to be reviewed, updated and reported via Capita's risk governance arrangements.

All contract level risks, including potential human rights, modern slavery and human trafficking risks, follow our Group Risk Management Framework (GRMF). The GRMF is defined at Group level and mandated throughout the company.

Visit our Annual Report and Accounts 2024, pages: 68-74 for more information about our risk's governance and oversight: [Click here](#)

We identified two areas of priority risks in relation to modern slavery and human trafficking, one in relation to our colleagues, and another in relation to our suppliers.

Colleagues

We have a virtual-first working approach and offer flexible and remote work wherever client and business needs allow. We are aware that this virtual-first approach could have safeguarding implications for vulnerable colleagues.

To manage the potential risks, the wellbeing of all our colleagues, whether working from home, remotely, in the field or in the office has remained our priority.

Our approach to wellbeing is to prioritise and create working environments that protect, support, and promote the wellbeing of all our colleagues, managing any factors that may cause negative emotional, psychological, physical, or social impacts. We expect everyone to utilize the tools and resources available to them to help look after their own wellbeing and support the wellbeing of colleagues. Wellbeing is referenced in our Health, Safety and Environment annual training.

All colleagues are encouraged to ask for help when needed, and we have a range of support options available. We have established a Wellbeing Hub to bring all our resources supporting physical, mental, social and financial wellbeing together in one convenient and accessible place. We have Employee Assistance Programs or similar support services available to all colleagues globally which provide

access to counselling and online resources. In addition, colleagues can raise a request for reasonable adjustments if required.

We regularly engage with our people to promote wellbeing events and initiatives, driving a proactive approach to awareness and prevention. We continue to develop our culture, so wellbeing becomes an intrinsic part of everything we do, encouraging managers to have wellbeing conversations with their people as part of their regular check-ins.

Our Safeguarding Policy and Standard set out our approach to protecting our teams, service-users and any member of the public who we have contact with. All colleagues complete mandatory safeguarding training and regular assurance activities are carried out to ensure that the standard is being complied to across Capita.

In addition, we provide a SafetyNet service - expert independent support and advice to HR partners and people managers across Capita. SafetyNet is a senior multidisciplinary group, was launched in 2021 to help manage complex HR situations that relate to the health, safety, wellbeing of team members, for example, those who have attempted suicide. SafetyNet also provide support for concerns relating to modern slavery.



Suppliers

We have a Supplier Risk Framework for assessing and managing our supply chain risk and have introduced controls to ensure compliance to our Policies and Supplier Charter. This Risk Framework covers the full supplier lifecycle and defines the organisational responsibilities for supplier management.

As part of the implementation of the framework and assessment, we annually review our strategic and high-risk suppliers against our responsible business commitments and credit risk.

As part of the Supplier Risk Framework, we undertake rigorous due diligence on all our suppliers and partner with EcoVadis, an independent ratings body, who can assess companies against four themes:

- environment
- ethics
- sustainable procurement
- labour and human rights

We consider the labour and human rights theme as a priority risk area in relation to modern slavery, and as such suppliers are assessed against all aspects of their treatment of their people, including a requirement to provide evidence of how they guard against modern slavery. In 2024:

- Our suppliers with valid EcoVadis scorecards on average scored 57 out of 100 against the EcoVadis benchmark and 58 on their labour and human rights assessment, earning a good status
- 7.3% of our spend was with suppliers in high-risk countries

The combined effect of our supplier onboarding, due diligence checks, EcoVadis third party audits and our Supplier Risk Management Framework, resulted in zero material breaches occurring.



Due Diligence

We work with partners through direct and indirect recruitment channels who must comply with our Supplier Charter and undergo our rigorous due diligence assessment, to ensure they are recruiting in line with our policies, values and focus on driving inclusive resourcing practices.

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 using environmentally responsible practices where practicable.

We operate a rigorous supplier onboarding due diligence process to ensure all new suppliers can adhere to and understand what we expect from them under our Supplier Charter. Continued monitoring of adherence to the Supplier Charter is carried out via an ongoing annual risk questionnaire for strategic and high-risk suppliers.

The questionnaire covers the following areas:

- human trafficking and slavery
- anti-bribery and corruption
- equal and fair opportunities
- health and safety
- the environment
- data protection
- risk management
- information security and bribery
- sanctions
- safeguarding and wellbeing
- clinical

We prioritise suppliers that can demonstrate commitment to upholding responsible business practices. Our tendering process includes an increased weighting for those suppliers that perform well against our required criteria related to modern slavery, environment, diversity and inclusion as well as gated criteria for supplier charter acceptance, anti-bribery & corruption, and financial crime. This takes the form of a mandatory corporate social responsibility questionnaire, which includes a statement supported by evidence of a supplier's commitment to addressing human rights and modern slavery which is reviewed for completeness and compliance.

Our standard terms and conditions include a clause that all suppliers are required to comply with our Supplier Charter, under which Suppliers are expected to uphold the highest standards of human and labour rights. We have zero tolerance for modern slavery and reserve the right to terminate a relationship with a supplier or third party that cannot demonstrate compliance with our Human Rights Policy and Modern Slavery Statement.

Additionally, we do not supply any goods that have been identified by the [US Department of Labor](#), to be at higher risk of being produced by child or forced labour.

Training and communication

Training

To make colleagues aware of the Modern Slavery Act 2015, we share this statement with all colleagues through our internal communication channels. A copy of this statement is available on the Capita website (www.capita.com).

We also provide training on our policies – please check details in the policy section.

In 2024 we continued to provide awareness training to all colleagues, both inside and outside the workplace, of our commitments to identify the risks of, and remove all instances of, modern slavery, human trafficking and exploitation. This has been implemented through our mandatory pan-Capita Code of Conduct and Safeguarding training.

We have also launched more detailed training for colleagues that have direct responsibility for upholding our commitment to eradicating modern slavery from our business and supply chain. The Chartered Institute of Procurement & Supply (CIPS) Ethical Procurement Training has been completed in 2023, by all senior procurement buyers to uphold our commitment to ethical procurement and supply practices.

Communication

We seek feedback from colleagues through our annual People and Pulse Surveys, which are open to all colleagues.

In 2024, the people survey results showed teams and managers are doing a good job. Trust levels are high within teams, there are regular discussions about performance, and colleagues feel that their managers care about their wellbeing and help them succeed to their full potential.

We also communicate with all our colleagues on a regular basis on number of issues, this includes companywide communication and campaigns, as well as divisional and local communication: all hands calls, listening groups and engagement sessions.





Key performance indicators

Our effectiveness in combatting slavery and human trafficking

Our Supplier Relationship Management Framework enables the close management and monitoring of our supplier compliance to our Policies and applicable legislation and regulation and adherence to our Supplier Charter. We assess our suppliers’ performance across four key Responsible Business themes:

- environment
- ethics
- sustainable procurement
- labour and human rights

Throughout 2024, there has been ongoing tracking and monitoring of KPIs related to modern slavery mitigation. This effort includes a combination of supply chain management and training for all colleagues to raise awareness about modern slavery and human trafficking, as well as our policies, procedures, and reporting mechanisms.

Key Performance Indicators	Target	2024
Proportion of suppliers assessed using our risk management framework covering adherence to our supplier charter (new & reactivated suppliers)	99%	98.9%
Overall number of high-risk suppliers as per Global Slavery Index	N/A*	4
Number of material breaches	None identified	None identified
Code of Conduct training completion rate	95%	97.5%
Modern Slavery Government Assessment tool performance	96%	96%

*Capita seeks to avoid engagement with suppliers operating in regions identified as high risk for modern slavery. Where such engagement is necessary, robust mitigation measures and commercial safeguards are implemented to protect its supply chains.

Board approvals

This statement is made pursuant to section 54(1) of the Act. Capita’s Chief Executive Officer approved this statement on behalf of the Capita Executive Team on 23 June 2025. The Board Responsible Business Committee approved this statement on behalf of the Capita plc Board on 23 June 2025.

Adolfo Hernandez
Chief Executive Officer
June 2025



 **Capita**