



# Human Rights & Modern Slavery Policy

At Capita we align our approach to the human rights standards set out in the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on the Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights. We believe in creating better outcomes, and that every individual should have the freedom to lead a dignified life, free from fear or want, and free to express independent beliefs. We are committed to preventing modern slavery in all its forms and take a zero-tolerance approach to any form of exploitation within our operations and supply chains.

## We are committed to

- Operating our business in line with all internationally recognised human rights standards and will not take part in, or benefit from, any activity that breaks any law relating to human rights.
- Respecting human rights principles and preventing modern slavery in all aspects of our organisation globally and in our interactions with each other, our clients, suppliers, and customers.
- Providing fair working conditions for all colleagues including terms and conditions of employment, remuneration and benefits, working hours, freedom of association and colleague representation, health and safety, resting time, paid holiday entitlements and benefits. These are applied according to territory-specific statutory requirements.
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

- Embedding our commitment to human rights (including labour and workplace rights) and modern slavery prevention, into our core policies and ways of working. In line with our:
  - Modern Slavery Statement
  - Diversity, Equity and Inclusion Policy
  - Anti-Racism, Discrimination, Bullying and Harassment Policy
  - Code of Conduct
  - Speak Up Policy
  - Procurement Policy and Supplier Charter
  - Financial Crime Policy
  - Anti-Bribery & Corruption Standard
  - Health, Safety and Environmental Policy
  - People policies, standards and procedures

## What you should expect from us

- Modern slavery is a grave violation of human rights. We take a zero-tolerance approach to any form of exploitation within our operations and supply chains, this includes human trafficking and slavery, servitude and forced or compulsory labour.
- We will not use forced, bonded or compulsory labour (including slavery and servitude). Workers

are not required to lodge 'deposits' or identity papers with us and can leave after giving reasonable notice, with all wages owed to be paid. Colleagues will not be forced into involuntary labour and coercion at work is not acceptable.

- We will not use child labour and will comply with all relevant laws in this regard. Workplace apprenticeships, internships and other similar programmes that might engage a person under 18 will comply fully with the applicable laws and regulations.
- We require our suppliers and partners to adhere to our ethical standards, including our Supplier Charter, and 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 UK's Modern Slavery Act 2015 or equivalent legislation globally.
- You can find out more about our commitment to eradicating modern slavery in our Modern Slavery Statement available on our [website](#).

#### *Preventing bribery and corruption*

- In line with our Anti-Bribery & Corruption Standard we will not pay bribes and will ensure that the Company's services are not used to abuse human rights.

#### *A safe and healthy workplace*

- We promote and foster a safe and healthy workplace environment, in line with the requirements in our Health, Safety and Environmental Policy, Wellbeing Policy and associated standards and procedures.

#### *Freedom of association, employee representation and social dialogue*

- We respect our colleagues' right to freedom of association and employee representation, including the right to join or not to join a trade union, in line with local legislation. Where local rights to collective bargaining exist, it will be supported.
- We engage in structured social dialogue with recognised employee representatives and support collective bargaining where applicable.

We aim to provide reasonable advance notice to employees and their representatives ahead of significant operational changes that may substantially affect them in accordance with applicable laws, regulations and/or collective agreements.

#### *Working Conditions*

- We will ensure that all working conditions are reasonable and comply with the local legislation and industry standards in the jurisdictions we operate.
- Hours of work will be in line with local law or, in the absence of a law, the norm within that industry, and will not be excessive. Colleagues will not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis and paid additionally, as required. Extra and atypical hours will be compensated in accordance with applicable laws, regulations and procedures.
- 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.
- We will provide written and clear contracts of employment which detail pay and the terms and conditions of employment.
- We respect and uphold the principle that acceptable living conditions are essential to human dignity. While Capita does not directly provide housing or subsistence, we ensure our own employment practices meet high standards of fairness and safety. Across our supply chain, we expect partners to uphold responsible human rights standards, including payment of minimum living wages, adherence to maximum working hours, and provision of acceptable living conditions where relevant, to support the wellbeing of all individuals involved in delivering our services.
- We ensure that all employees receive paid annual leave in accordance with statutory and contractual entitlements. Annual leave is credited every year and is monitored to support work-life balance. Employees are encouraged to take

their leave regularly. Our approach reflects our commitment to fair working conditions and respect for employee wellbeing across all jurisdictions.

#### *Equal opportunity and non-discriminatory treatment*

- We respect all workers right to equal opportunity and non-discriminatory treatment and take a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment and bullying.
- We set out our commitment and expectations in our Diversity, Equity and Inclusion Policy, Anti-Racism, Discrimination, Bullying and Harassment Policy and Code of Conduct on our [website](#).
- We have clear grievance procedures in place which are available and accessible to all colleagues enabling them to raise concerns or complaints. All issues are investigated and managed fairly and consistently.

#### *Remuneration*

- We will remunerate our workers with wages and benefits that meet the jurisdictional standards that apply.
- Our colleagues' 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.
- We are committed to equal pay and benefits, we also take action to address pay gaps. You can find out more in our Gender and Ethnicity Pay Gap Report available on our [website](#).

#### *Working with suppliers*

- We expect our suppliers to operate in accordance with this policy upholding the principles of human rights and actively preventing modern slavery in their operations and supply chains.
- We expect all our suppliers to adhere to our Supplier Charter and to report any incidents of non-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.

- We provide mandatory annual Ethical Procurement training offered by Chartered Institute of Procurement and Supply (CIPS) to all Senior Procurement buyers to recognise and prevent modern slavery.

#### **What we expect from our colleagues**

- To treat everyone fairly, respecting their right to work in an environment free from fear or want, and where there is freedom to express their independent beliefs.
- To stay informed and vigilant about human rights and modern slavery, complete our Code of Conduct training annually any other required training in order to recognise and respond to potential breaches.
- To speak up, if you face a situation, or circumstances where you are uncertain or not sure what to do with by letting your manager know in the first instance.
- If you have a concern that human rights are not being respected, for example, you believe someone has been unfairly discriminated against, bullied, harassed or treated unfairly, or that something is illegal or unethical or does not comply with our Code of Conduct then speak up.
- Our [Speak Up Policy](#) and Grievance Procedures set out the channels available to you to do so and no action will be taken against you if you report a genuine concern. Whether any concerns are proven or not.

#### **What we expect from our leaders and managers**

- To take responsibility for ensuring our business is conducted in a way that is consistent with human rights (including labour and workplace rights) and the prevention of modern slavery as set out in this policy.
- To consider risks to our people as risks to our business and manage these in line with the commitments of this policy and our company risk management approach.
- To take responsibility for the prevention, detection and reporting of human rights violations or modern slavery in any part of our business or supply chains.

- To make colleagues aware of and provide guidance in relation to the policies, standards, procedures and training relevant to their role.

### How we achieve this

#### Our Employees

- Our employment approach, people policies, practices and appropriate training maintain our focus on human rights and modern slavery prevention and set out our commitment to treating our colleagues fairly. This ensures we:
  - Recruit and select colleagues in a fair, lawful and professional manner, both for internal and external candidates.
  - Treat all colleagues fairly throughout their employment.
  - Provide procedures to raise grievances and speak up if there is an occasion when a colleague does not feel that they have been treated fairly.
  - Manage the exit of a colleague from the business in a fair and consistent manner.
- We ensure the principles of this policy are reflected in our employment practices and standard terms and conditions of employment and that these are reviewed and updated regularly.
- We take non-compliance very seriously and if found then the necessary steps are taken to ensure that it is addressed. This includes additional training, corrective and disciplinary measures if the behaviours and actions are deemed to be serious or wilful.

#### Our Suppliers

- Whilst working with our suppliers 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 and Modern Slavery Policy. Our standard Supplier Terms and Conditions, Procurement Policy and Supplier Charter set out these requirements.
- We actively monitor our suppliers based on geographic and industry-type risk against the

Walk Free Foundation Global Slavery Index (GSI) who provide national prevalence and vulnerability estimates of modern slavery for 160 countries worldwide. We also monitor strategic suppliers using EcoVadis, an independent ratings body, who evaluate suppliers on a range of ESG metrics including Labour and Human Rights.

- All suppliers are mandated to adhere to the Capita Supplier Charter and continued monitoring is carried out via an annual risk questionnaire for strategic and high-risk suppliers.



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