Modern Slavery and Human Trafficking Statement 2021







The information in this statement, which is signed by Jon Lewis our Chief Executive Officer, 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 companies¹ and is Capita's Modern Slavery Statement for the financial year ended 31 December 2020, required under the provisions of the Modern Slavery Act 2015 (the "Act").

Highlights of the year

The events of 2020 dramatically changed society and its relationship with business. While Covid-19 impacted every aspect of our lives, the world also experienced intensified political divisions and increasing inequality, and the climate crisis continued unabated. However, the economic and social upheaval that we all experienced during the pandemic provided a unique opportunity to innovate and challenge the status quo of how we live and work. Capita responded by:

Prioritising the welfare and safety

of our colleagues, successfully mobilising 85% of our people to work from home to ensure security of continued employment and income. At the same time, we've continued to deliver for our clients, working with them to support frontline services.

Acknowledging the mental strain and vulnerability that Covid-19 placed on

our colleagues by providing a wide range of resources for employees to support their mental, physical and financial wellbeing, and to help limit the likelihood of exploitation during a period of unprecedented uncertainty and stress. This included access to the Capita Wellbeing Hub, Employee Assistance Programmes and, where needed, access to counselling on the phone or face to face.

Supporting our employees financially by enhancing our family leave policy

in the UK to help safeguard their financial wellbeing and security. This involved giving all primary caregivers 15 weeks' full pay for maternity, adoption and shared parental leave. We also increased paternity pay to two weeks' full pay.

Setting the Real Living Wage as a minimum for all UK employees,

a voluntary rate of pay set by the Living Wage Foundation that is higher than the government minimum and based on the costs of living to mitigate against the risk of labour exploitation among low income workers and households. In our international operating locations, our employees' pay is not 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 paying a living wage where that has been defined and to set equal pay rates for roles regardless of gender, race or other characteristics.



Partnering with Microsoft and Google to support the Department for Education's Platform Provisioning Programme to

fund and deploy digital learning platforms to every school that needed this support. The programme was vital to disadvantaged families as it enabled young people from those families to continue their education despite the restrictions imposed during the pandemic. Our teams helped schools access the right digital education platform so that teachers could communicate directly with pupils, set individual tasks, allow pupils to work together and easily communicate, and give and receive personalised feedback.

Developing an end-to-end youth programme with our partners The Youth Group and Teach First in response to the UK Government's Plan for Jobs, to tackle

the growing youth financial and unemployment crisis. A key element of the programme involved the creation of our first ever Youth Council. The Council, which we launched in December 2020, provides a platform for the voice of the future workforce to be heard within Capita, ensuring that we create an inclusive organisation that attracts young people, including from vulnerable or disadvantaged backgrounds, and that we develop products and services which meet the needs of our future service users and consumers. Remaining close to our charity partners, Teach First and Young Enterprise, to help

them adapt to these unprecedented challenges, and to play our part in equipping young people with the skills they need to succeed in the workplace and avoid exploitation. In 2020, we empowered over 22,000 young people with essential skills needed for the world of work through our charitable and client partnerships.

Strengthening our approach to doing

business in the right way, publishing our Code of Conduct, and refreshed Supplier Charter and Speak Up Policy. We also launched our new Global Anti-racism, Discrimination, Harassment and Bullying Policy and procedure alongside supporting training.

To read more about our activities over the past year, please visit our **Annual Report** and **Responsible Business Report**

The impact of Covid-19 on our operations

Our people

Our priority throughout Covid-19 has been to protect the **welfare and safety** of our colleagues

21,500

average visits per month to the **Wellbeing Hub** since its launch in April

85%

of people **working from home** at the height of the pandemic

+7 pts

movement in **employee net promoter score** (eNPS)

6%

of colleagues **furloughed** at peak



Our commitment

Slavery is illegal everywhere in the world, but despite that, there are currently an estimated 40.3 million people in modern slavery or victims of human trafficking across the globe. Out of the millions of people trapped in modern slavery, 16 million people are exploited by the private sector, so it is paramount that businesses take action to end these abhorrent practices.

At Capita, we are committed to playing our role by ensuring that through our management and operations 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 are taking the appropriate steps to ensure that everyone who works for Capita benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

² https://www.fastinitiative.org/wp-content/uploads/ BlueprintExecutive-DIGITAL-1.pdf

Our business and structure

Capita is a consulting, transformation and digital services business, with annual turnover of £3.3 billion. We deliver innovative solutions to simplify the links between businesses and customers, governments and citizens, partnering with our clients to transform their businesses and services.

We do complex and difficult things — so clients don't have to. We are part of the fabric of society, helping millions of people every day. We work across a range of sectors, providing the insight, innovative solutions and cutting-edge technologies that give time back, allowing our clients to focus on what they do best and making people's lives easier and simpler.



Our divisions

Capita has six operating divisions. Five — Software, People Solutions, Customer Management, Government Services, and Technology Solutions — are focused on key growth markets; and the sixth, Specialist Services, contains standalone businesses that are managed on a portfolio basis to maximise value. The six divisions are supported by a common set of company-wide capabilities and functions.







Our purpose and values

Our purpose at Capita is to create better outcomes for all our stakeholders through living our values, which involve all employees being open, ingenious, collaborative and effective. We bring these values to life through our day-to-day behaviour and by aspiring to put our purpose at the center of everything we do.





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Our stakeholders

Capita is a purpose-led organisation that exists to create better outcomes for all our stakeholders.

This includes our people, clients, customers, suppliers and partners, as well as investors, civil society organisations.



Stakeholder	What matters to them	How we engage
Our people	 Flexible working Learning and development opportunities leading to career progression Fair pay and benefits as a reward for performance Two-way communication and feedback 	 People survey Regular all-employee communications Employee director participation in Board discussions Employee focus groups and network groups
Clients and customers	 High-quality service delivery Delivery of transformation projects within agreed timeframes Rapid response to support pandemic planning 	 Client meetings and surveys Regular meetings with government and annual review with Cabinet Office Created a senior client partner programme giving an experienced, single point of contact for key clients and customers
Suppliers and partners	 Payments made within agreed payment terms Clear and fair procurement process Building lasting commercial relationships Working inclusively with all types of business 	 Supplier meetings throughout source to procure process Regular reviews with suppliers Supplier questionaires
Investors	 Financial reporting Access to the Board and senior managment Regular communication 	 Financial and other reports and trading updates Regular investor programme and feedback throughout the year Government roundtable for shareholders Remuneration consultation
Society	 Social mobility, youth skills and jobs Digital inclusion Diversity and inclusion Climate change Business ethics 	 Memberships of non-governmental organisations Charitiable and community partnerships



We also recognise that there are risks in relation to modern slavery and human trafficking outside of our core stakeholder groups. That is why we work closely with other partners such as recruitment agencies and trade unions to mitigate those risks:

Recruitment agencies

In 2020 we recruited, or supported internal movement for, more than 8,000 people through our internal resourcing team and via external recruitment agencies. We work with 175 agencies who must comply with our Supplier Charter and undergo our rigorous due diligence assessment to ensure that they are recruiting in line with our policies and values, and that they apply inclusive and value-based recruitment practices.

Trade unions

Capita takes a partnership approach to union relations as we believe it adds value to all the stakeholders and relationships concerned.

We also believe it provides our employees and our recognised unions with genuine opportunities to contribute to the future success of our organisation.

Many of our contracts are unionised environments, and an essential part of our approach is to maintain proactive and constructive relationships with those groups. To achieve this, we meet with recognised trade unions in line with the collective agreements in place, for example Unison, Communications Workers Union (CWU) and Unite, as determined, on a regular basis. Matters for discussion can include business performance, working conditions, strategy and resolving local issues raised.

Our people

Capita has a workforce of more than 55,000 people employed in 10 countries.

We have around 7,000 colleagues in India, 3,900 in South Africa, and others in Germany, Ireland, Poland, Switzerland, the United Arab Emirates and the United States. Having a professional, engaged, well-managed and supported workforce is critical to our ability to successfully create better outcomes for all our stakeholders. Most of our employees are office-based and our operations do not require seasonal workers.

	People Employed	
Country HC per worker type	Actual	%
Germany	4,721	8%
India	6,918	12%
Ireland	1,260	2%
Isle of Man	58	0%
Poland	482	1%
South Africa	3,882	7%
Switerzland	1,110	2%
United Arab Emirates	83	<1%
United Kingdom	37,018	67%
United States of America	11	<1%
Total	55,543	100%

Our clients and sectors

Private sector: | Financial Services | Pensions | Retail | Telecoms and Media | Transport | Energy and Utilities

Public sector: | Central Government | Local Government | Education | Defence and Security | Health and Welfare | Justice and Emergency Service



Our supply chain

With over 24,000 suppliers, we recognise that Capita's supply chain is critical to our success and is also 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 safeguard employees and workers, especially those most at risk to labour exploitation, and vulnerable or disadvantaged families who face barriers to sustainable employment and income. In 2020, we spent £2bn with more than 24,000 direct suppliers in 87 countries. Our suppliers originate from 88 countries, and 81% of them are based in the United Kingdom. 3.1% of our suppliers originate in eight countries with a high risk of modern slavery, with 2.99% from India. Less than 1% of our suppliers originate from the remaining high-risk countries as defined by the **Global Slavery Index**.



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 Dow Jones Sustainability Index (DJSI)³ and EcoVadis Corporate Social Responsibility (CSR) assessment⁴. Our ranking in the DJSI improved by nine places and we maintained a silver rating in the EcoVadis assessment. Both DJSI and EcoVadis assess our approach to labour and human rights, which includes our response to modern slavery. In 2021 we will be participating in S&P Global Corporate Sustainability Assessment (CSA).

In February 2020, we became the first business to be accredited by the Good Business Charter, a new initiative developed in partnership with the Confederation of British Industry and Trades Union Congress. The Good Business Charter (GBC) accreditation aims to raise the bar on business practices in several areas, notably employee wellbeing (including modern slavery activities), policies on tax and the environment, and responsibilities towards customers and suppliers.

³ The DJSI tracks the stock performance of the world's leading companies in terms of economic, environmental and social criteria.

⁴ The EcoVadis CSR Assessment is an evaluation of how well a company has integrated the principles of CSR into their business.

The objective is to get a clear picture of your CSR practices (i.e. environment, social, ethics, supply chain).

Governance and policies

Our governance

Our commitment to human rights and the eradication of modern slavery is overseen by our senior leadership team. Capita's Executive Committee consists of functional heads and executive officers who are entirely accountable for their division and function, including Responsible Business, People and Procurement.

Overall accountability is held by the Responsible Business Committee, chaired by the Chief General Counsel, Claire Chapman. Capita's Chief Executive Officer, Jon Lewis, and the Board have final sign-off of the Statement.

Our policies

The following company policies support us in mitigating the risks of modern slavery in our business and supply chain. They apply to all Capita plc Group companies and are available to all employees via our intranet site and website. The policies are managed by relevant functional heads such as People, Procurement, Responsible Business, and are imbedded in our company-wide risk management framework.

Code of Conduct >

Describes what we must do and how we must behave, to ensure we have the trust of all our stakeholders. It details how we will create better outcomes in the right way, not at any cost, in line with our purpose and values. There is a related training module available to all colleagues via the Capita Academy, our learning platform.

Speak Up Policy >

Sets out our commitments to speaking up about serious concerns, detailing how any person working at or with Capita, including those employed in our supply chain, can raise concerns or 'whistle blow' and the channels available to do so confidentially, responsibly and effectively and without fear of repercussions. This policy is supported by a fully anonymized online portal which is accessible to all stakeholders, and 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 regulated areas of Capita.

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 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 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' employees or contractors to report any breaches through their own grievance mechanism, or directly to Capita.

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.

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.

Anti-racism, Discrimination, Harassment and Bullying Policy

Capita has a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment, bullying and all forms of exploitation with a clear 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 employees.

Human Rights Policy >

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 Diversity and Inclusion training module.

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, freedom of association and employee representation, health and safety, resting time, holiday entitlements and benefits. These are applied according to territory-specific statutory requirements.

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 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.

Our Human Resources policies set out our commitments to treating our employees fairly. To uphold our position as a responsible employer, 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
- provide procedures to raise grievances if there is an occasion when an employee does not feel that they have been treated fairly, including involving a local trade union where applicable
- manage the exit of an employee from the business in a fair and consistent manner

Where non-compliance is found then the necessary steps are taken to ensure that this is managed accordingly. Steps range from additional training on specific subjects through to disciplinary measures if the behaviours and actions are deemed to be serious or wilful.

Capita has clear procedures in place for employees to raise concerns or complaints about work issues. Capita's commitment includes the provision of a clear approach to raising a grievance, communicated to all colleagues, and that all issues raised will be dealt fairly and consistently to avoid any claims of discrimination or unfair treatment. Investigations are fully managed, and all hearings held promptly. There is also a fully documented appeal process, with transparent steps in a fully documented Grievance Procedure easily available and accessible to all.

Risk management

All contract risks, including potential human rights, modern slavery and human trafficking risks, are managed and monitored through the contract lifecycle, as per our Corporate Risk Management Framework. This requires rigorous assessment at contract, business unit and divisional level and review at executive level.

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

Our people

In 2020 our Covid-19 response measures resulted in 85% of Capita's workforce having to move to a home-working environment, which could lead to safeguarding and vulnerability issues.

To manage the potential risks relating to employee vulnerability, the wellbeing of all our colleagues (whether working from home, remotely, in the field or in the office) has remained our priority. We established a Pandemic Response Team led by our Chief Transformation Officer, who meet on a weekly basis to continually monitor and manage the impact of Covid-19 on our operations and workforce globally.

We identified a specific modern slavery and exploitation priority risk in relation to the inability to carry out standard 'right to work' in-person identity checks due to the social restrictions imposed during Covid-19. Across our operating geographies this had the potential to increase opportunities for exploitation within our workforce.

From 30 March 2020 and up until 20 June 2021, in the UK, we have implemented the Covid-19 adjusted right to work checks and processes stipulated by the UK Government across all operating geographies. This requires receipt of scanned copies of identity documentation, followed by confirmation of identity via video call. We expect this risk to be further mitigated once all social restrictions end. Additionally, when lockdown restrictions were first announced in March 2020, Capita established a Wellbeing Hub with resources to support the physical, mental and social wellbeing of our employees, which includes access to a financial wellbeing portal.

This information was, and still is, promoted via the People Hub and Capita's Employee Network Groups on Yammer. Capita has Employee Assistance Programmes available to all colleagues globally which provide counselling, as well as online resources and support. Managers have also been encouraged to have wellbeing conversations with their people as part of their regular check-ins and a process was established to enable colleagues to request to work from a Capita office (where safe to do so) where mental health or safety concerns about their home environment had been raised.



Our suppliers

We have a Supplier Risk Framework for assessing and managing our supply chain risk and introduce 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 review annually our Tier 1 and high-risk suppliers against our Responsible Business commitments and credit risk. In 2020 this process highlighted a priority risk in relation to the recruitment of employees into suppliers in our high-risk purchase categories.

As part of the Supplier Risk Framework we partner with EcoVadis, an independent ratings body, who 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 2020:

- **755 (3%)** of all our direct suppliers were identified as high-risk and were invited to complete an audit
- 85% of our high-risk suppliers' portfolio were audited, scoring 56 against the EcoVadis benchmark of 45.8 for all labour and modern slavery related KPIs
- 6% of Capita's spend was in eight identified high-risk purchase categories, including building maintenance, catering and food services, cleaning, and temporary recruitment, of which only 0.01% was delivered from high risk countries.

The combined effect of Capita's supplier onboarding, due diligence checks, EcoVadis 3rd party audits and our Supplier Risk Management Framework, resulted in zero material breaches occurring.

Due diligence

We work with partners through both direct and indirect recruitment channels who must comply with our Supplier Charter and undergo our rigorous due diligence assessment, to ensure that 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.

Suppliers' compliance with the Supplier Charter is managed through our rigorous supplier onboarding due diligence process for all new suppliers and an ongoing annual risk questionnaire for Tier 1 and high-risk suppliers. **The questionnaire covers the following areas:**

- · human trafficking and slavery
- · health and safety
- · the environment
- · data protection
- · information security and bribery

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. 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 and 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 employees aware of the Act we share this statement with all employees through our internal communication channels and 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 of our website.

In 2021 we are providing an awareness training to all employees of our commitments to identify the risks of, and remove all instances of, modern slavery, human trafficking and exploitation.

We will also be launching more detailed training for employees that have direct responsibility for upholding our commitment to eradicating modern slavery from our business and supply chain. This will include our procurement and resourcing teams.

Communication

We seek feedback from employees through our annual People Survey, which is open to all Capita employees.

In 2020, 72% of colleagues responded to our People Survey, matching our 2019 participation rate and demonstrating our ability to maintain our overall employee engagement in unprecedented times. The results from the survey help leaders and our People function team identify behaviour and practices that could lead to a failure of ethics, control or governance before they occur. This confidential feedback also allows for potential instances of exploitation in any form to be raised and investigated.

72% of our colleagues completed our annual People Survey in 2020, demonstrating our ability to maintain our overall employee engagement in unprecedented times".

We established seven Employee Network Groups (ENGs) in March 2020. The networks, which are sponsored and championed by Executive Committee members, give further voice to our people through a two-way feedback loop between the networks and their sponsors, encouraging colleagues to share their experiences and ideas on how we can create a more inclusive organisation. Over 10,000 colleagues have joined these networks.

Over 10,000 colleagues have joined our Employee Networks, established in March 2020".

We also communicate with all our employees on a regular basis on number of issues, this includes Group wide communication and campaigns, as well as divisional and local communication.



Key performance indicators

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

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

In 2020 we started to track and monitor KPI's relating to modern slavery in our supply chain, focusing on all Tier 1 and high-risk suppliers. 2021 will see increased coverage across the supply base.

Key Performance Indicators	2020	
Proportion of suppliers assessed using our risk management framework	Tier 1 Suppliers 90% New Suppliers 2020 95%	
Overall number of high-risk suppliers	755	
Proportion of high-risk suppliers who have been assessed as having appropriate policies and procedures in place with respect to modern slavery	85%	
Number of material breaches in the past 12 months	None identified	

Additionally, going forward we will track training and awareness relating to modern slavery in both Capita and our supply chain in terms of attendance and effectiveness.

Board approvals

This statement is made pursuant to section 54(1) of the Act. Capita's Responsible Business Committee approved this statement on behalf of our Executive Committee in May 2021. Capita's Chief Executive Officer, Jon Lewis and Capita Plc Board approved this statement in May 2021.

Jon Lewis Chief Executive Officer May 2021

Capita