WEST UC LIMITED
Modern Slavery Statement

West UC Limited Statement Regarding Modern Slavery and Human Trafficking Laws.

West UC Limited ("West UC") is a subsidiary of West Corporation ("West") and is a business unit of West's Unified Communication division. West and its subsidiaries (collectively, the "Company") have over approximately 9,000 employees worldwide (as of September 2018) operating globally, servicing Customers with technology-enabled communication and network infrastructure services.

This statement (the "Statement") should be read in conjunction with the Company's Code of Ethical Business Conduct, Employment policies, procedures and its overall compliance programme. The Company is committed to continuously improving its practices and procedures to ensure that its business is conducted in compliance with the applicable laws and regulations globally. To that effect, West's Code of Ethical Business Conduct provides and establishes the guiding principles to all of the business units.

The purpose of this Statement is to ensure that the Company is compliant with the principles of the Modern Slavery Act 2015 (the "Act") including laws against human trafficking in the U.K. and other jurisdictions where the Company operates. This requires the Company to provide a Statement at the end of every financial year setting out its commitment to eradicating any form of modern slavery and human trafficking from its business operations and from any form of its business conduct.

It is the Company's policy to comply fully with the Act. The Company does not tolerate modern slavery and/or human trafficking in any form and any such act is strictly prohibited within Company's business and its applicable supply chain(s).

Company Employees

The Company recognises the importance of the duty to respect human rights for its employees. The Company, strives to be in compliance with and adheres to the internationally recognised principles of human rights and the applicable national labour and employment laws. The Company has a zero tolerance approach to modern slavery and human trafficking. The Company is committed to acting lawfully and in compliance with the principles of International Labor Organization (ILO), rights of individuals as recognised by the International Bill of Human Rights (IBHR), and other recognised international principles prohibiting human trafficking and slavery.

The Company is highly committed to treating all its employees with dignity and respect and explicitly prohibits human trafficking and the use of involuntary labour. In order to meet this commitment, amongst other things, the Company ensures all work is voluntary, never withholds workers' original government-issued ID or travel

documentation and ensures that forced labour conditions are not entertained or supported within its business.

Supply Chain

The Company is committed to ensuring that there is no modern slavery or human trafficking in its supply chain. The Company's Code of Ethical Business Conduct reflects this commitment to act ethically, lawfully and with integrity in all of its business relationships. The Company is committed to the implementation and enforcement of stringent contractual controls to ensure modern slavery and human trafficking is not taking place anywhere within the Company's supply chain.

In addition, the Company expects the same high standards from all its contractors, suppliers and other business partners and as part of its contracting processes. The Company includes specific provisions in its contracts that require compliance with all applicable laws and regulations by its contractors, suppliers and business partners. The Company also expects that its contractors, suppliers and business partners will hold their own contractors, suppliers and business partners to the same high standards as followed by the Company itself to ensure that no form of modern slavery or human trafficking exists within the respective supply chains. The Company believes that with such a progressive and firm approach towards modern slavery and human trafficking, the Company will increase its positive impact in this sphere.

Company Internal Training

The Company appreciates and acknowledges the importance of enabling employees across the organisation to understand and respect the principles, objectives and implications of non-compliance with the Company's Code of Ethical Business Conduct. This commitment is reflected in the internal training programme that every employee mandatorily needs to complete on an annual basis which includes a presentation on the principles of the Act to ensure all employees are fully aware of the compliance requirement with the principles set out therein.

Emmanuelle Argoud (Oct 24, 2018)

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Vice President, Legal EMEA

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