

CIVICA

Transforming the way you work



Modern Slavery and Human Trafficking Statement

Civica Group

2017-2019

Introduction

This statement sets out Civica's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Civica Group Limited, including its associated and subsidiary companies, recognises that it has a responsibility under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking and we are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

We are a market leader in software applications, business process outsourcing and technology solutions. We operate across the UK, Ireland, Australia, New Zealand, Singapore, India and the USA, our supply chains are predominantly based within these countries.

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- ▶ **HR Policy** - We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally, and are paid at least the national minimum wage. Our employees won't be forced to work in excess of the number of hours permitted in law, and normal working hours won't exceed 48 hours per week average unless the employee agrees.
- ▶ **Purchasing Policy** - The organisation is committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to Civica's 'Quality Management', 'Environmental', 'Ethical Code of practice', 'Anti-Bribery' and 'Modern Slavery and Human Trafficking' policies which fulfil legal and financial obligations and effectively manages commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity and Corporate Social Responsible (CSR) standards, including but not limited to, compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.
- ▶ **Recruitment Policy** - The organisation uses only specified, reputable employment agencies to source agency workers and always verifies the practices of any new agency it is using before accepting workers from that agency.

- ▶ **Whistleblowing Policy** - We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Civica. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- ▶ **Our values** - Civica's values of Knowledge, Integrity and Action makes clear to our employees the actions and behaviour expected of them when representing Civica. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Due Diligence

We undertake due diligence when considering taking on new suppliers, and review our existing suppliers on a periodic basis. Our due diligence and reviews include:

- ▶ Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- ▶ Evaluating the modern slavery and human trafficking risks of each new supplier.
- ▶ Conducting supplier audits or assessments that have a greater degree of focus on slavery and human trafficking where general risks are identified.
- ▶ Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Awareness-Raising Programme

As well as training employees, the organisation has raised awareness of modern slavery issues by circulating information to employees.

The information explained to relevant employees includes:

- ▶ The basic principles of the Modern Slavery Act 2015;
- ▶ How employers can identify and prevent slavery and human trafficking;
- ▶ What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- ▶ What external help is available, for example through the Modern Slavery Helpline.

March 2018 Update

Since the publication of the initial Modern Slavery Statement in April 2017 relating to the 2016 financial year, we have continued to mitigate the risk of slavery and human trafficking in our supply chain. During the 2017 financial year, we have:

► Raised awareness of employees in Modern Slavery

As well as training relevant employees, we have raised the awareness of modern slavery issues by circulating information to all employees. The information has outlined the basic principles of the Modern Slavery Act 2015 as well as what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and what external help is available, for example through the Modern Slavery Helpline.

► Embedded Modern Slavery due diligence into the supplier set up process

The policy has been embedded into our New Supplier Set up process. All new suppliers are checked for compliance with any issues being explored as part of the set up due diligence.

The due diligence process is undertaken for **each** new supplier being set up as part of the 'new supplier' set up process. We have also undertaken checks across our existing supplier base and will update these checks every 3 years. The due diligence checks include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified, to include but not limited to:
 - Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.
 - Geographical risk (company registered address).

If when following this due diligence process we cannot deem suppliers as low risk, we proceed to establish further detail such as product, manufacturing location and relevant corporate policies (Modern Slavery and Human Trafficking, code of ethics, structure, governance and control, etc.) for further consideration. If the risk remains, findings are then presented to the legislative and regulatory group and CFO for a formal action plan to be agreed.

In addition, we are investigating the development of a reporting capability to the supplier database which will allow us to filter suppliers flagged as high risk, and undertake annual checks in a more efficient manner.

Due to the nature of the business, we have not identified any high-risk Modern Slavery concerns in 2017.



This is the third year of reporting on modern slavery from the Civica Group, and during the 2018 financial year, we have continued to review and increase our depth of work on modern slavery and ensure that we have put in place the most effective responses where risks have been identified. Our commitment to ensuring the prevention of slavery and human trafficking, either within our business or within our supply chain, is very clear. We will always treat people in our business and in our supply chain fairly.

Since the introduction of the modern slavery act, we have continued to review our supplier base, identifying those suppliers who we regard as high risk. The new supplier set-up process outlined in 2018 continues to be applied, and we have extended these arrangements to suppliers whose arrangements transfer to us following acquisitions. Through these processes, we have identified two suppliers in high risk countries and worked to assess the risks of these suppliers. We are pleased to confirm that no risks have been identified following our review.

We continue to ensure that the working conditions for all of our employees continue to exceed the statutory requirements in all of the countries that we operate in, and we conduct regular reviews against market standards. The continued expansion of our Vadodara office has increased our presence within India, and we continue to be an employer of choice within the local region. In addition, we have been identified within the UK as a Top 25 Employer of Choice and a Top 30 Flexible Employer. In Australia, we have also been identified as a Great Place to Work. We continue to apply these standards across the Group, and in 2019 will seek to gain accreditations for our remaining locations, ensuring that our employees are treated fairly and equitably.

We have also continued to review our Group policies and have improved our whistleblowing policy, ensuring that there is an anonymous process for employees, customers and other business partners to report their concerns related to the direct activities, or the supply chains of Civica. Our whistleblowing procedure continues to be designed to make it easy for employees to make disclosures without fear of retaliation.

Due to the nature of the business, we have not identified any high-risk Modern Slavery concerns in 2018.

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As an international business, Civica recognises that modern slavery and human trafficking are significant global issues that present challenges for businesses around the world. In line with our values of Knowledge, Integrity and Action, we are committed to continually improving our practices to combat modern slavery and human trafficking within our supply chains. We have a zero-tolerance approach to these issues and act with integrity in all of our business arrangements.

Wayne Story, CEO

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Board Approval

This statement has been approved by the organisation's board of directors, who will review and update it annually. Our Executive Management Team take responsibility for implementing this statement and its objectives. They will ensure adequate resources and investment to ensure slavery and human trafficking isn't taking place within our organisation or within our supply chains.



Director's signature:

Director's name: Wayne Story

Director's position: CEO