

Konecta Group UK Ltd

Modern Slavery Statement 2024

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Distribution List
Website
All Konecta UK Ltd employees
All Konecta UK Ltd temporary workers including sub-contractors
All Konecta UK Ltd third party suppliers and vendors

Signatures

Name	Position	Date
Tim Whitfield	UK Quality & Compliance Manager	[29.10.24]
Dan West	UK Operations Director	[29.10.24]

Rationale

Konecta Group are an international company that provides customer experience services worldwide. With more than 200 sites in 24 countries on 3 continents, and with around 130,000 people speaking more than 30 languages, we adapt to each country, culture, and time zone.

In the UK, Konecta UK Ltd operate from 2 sites within scope – London and Ringwood, Hampshire

Konecta UK Ltd recognises its responsibility to socially and ethically sound governance and seeks to strengthen its performance within a CSR compliance programme that is aimed at achieving its strategic goals as a company through four main action areas that cut across all areas of the business. These key action areas are identified as;

- Corporate Governance
- Human Capital
- Social Action
- Commitment to the Environment

Konecta UK Ltd has aligned its business goals and human capital management strategies to ensure the sustained growth of the business, alongside the professional development of its employees and the wellbeing and progress of wider society.

Scope

This statement (also known as the policy) is applicable to all functions and activities undertaken by all personnel at all Konecta UK Ltd sites, and all third party suppliers and sub-contractors – including temporary workers.

Roles and Responsibilities

It is the overall responsibility of the UK Senior Management Team to document a Modern Slavery Policy that details the organisation's commitment to developing, implementing, maintaining and continually improving socially and ethically responsible processes and business practices aligned with the UK Modern Slavery Act (2015).

It is the responsibility of the UK Senior Management Team to review this Modern Slavery Policy at least once per year, in conjunction with the UK Quality and Compliance Manager, and to determine the most applicable targets and objectives that meet the aims of the Policy Statement in line with the strategic direction of the organisation, applicable regulation and legislation, and client requirements.

It is the responsibility of the UK Quality and Compliance Manager, in conjunction with the UK Senior Management Team, to review this Policy Statement at least once per year and to ensure that any amendments or changes required are actioned, and that it remains suitable, adequate and effective for the purposes for which it is documented.

It is the responsibility of the UK Quality and Compliance Manager, the UK Senior Management Team, and all Heads of Department along with Senior Managers to effectively communicate the content and importance of this Policy Statement and current targets and objectives to all personnel across the organisation, and to ensure their understanding is maintained.

It is the responsibility of all Konecta UK Ltd employees to read and understand this documented Policy Statement, and current targets and objectives, and their importance in delivering the aims, targets and objectives of the policy.

Konecta UK Ltd Modern Slavery Policy 2024

Modern Slavery Act (2015)

This statement is made pursuant to S54 of the Modern Slavery Act 2015 and sets out the steps that Konecta UK Ltd has taken, and continues to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Konecta UK Ltd has a zero tolerance approach to any form of modern slavery. The organisation is committed to acting ethically and with integrity and transparency in all business dealings to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the organisation or its supply chain.

Konecta UK Ltd is aware of its responsibilities towards clients, suppliers, employees and other stakeholders, as well as the wider community and expects all suppliers to adhere to the same ethical principles. The organisation is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Internal policies replicate the commitment to acting ethically and with integrity in all business relationships.

Our Supply Chains

Our supply chain includes software vendors, facilities management services, professional service firms, and recruitment agencies. Our major supplier is domestic UK recruitment firms. Konecta UK Ltd only sources within the UK and does not source from overseas regions where the risk of labour exploitation is considered higher.

However, we acknowledge that our suppliers have suppliers and we acknowledge that the complexity of international supply chains can pose challenges in identifying unethical practices. As such, we are committed to improving visibility and transparency within our supply chain to better assess and manage the risks of modern slavery and human trafficking.

We take specific actions to make sure that modern slavery or human trafficking is not taking place within our business or supply chain. We will continue to review and update these actions:

- All are introducing terms to our contracts so that suppliers sign up to Konecta UK Ltd terms and conditions of contract which contains a provision specifically including each supplier's commitment to anti-slavery and human trafficking in their own business and within their supply chains; and that they conduct their business in a manner that is consistent with the Modern Slavery Act 2015 and Konecta UK Ltd's anti-slavery policy.
- Konecta also has supplier audit rights to confirm such compliance.
- We undertake due diligence as outlined below in "Due Diligence"
- In addition, we will be asking our suppliers to make progress towards implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high risk sectors and product categories.

Modern Slavery and Human Trafficking Policies

Konecta UK Ltd has developed a robust policy framework made up of a number of internal policies to ensure that it conducts business in an ethical and transparent manner in support of our commitment to eliminate modern slavery. These include:

This **Modern Slavery Statement & Policy**

Group Human Rights Policy - designed to guarantee respect for human rights in all cases, and under any premise. This includes Preventing discriminatory practices, Rejecting Forced and Child Labour, Offering decent employment, Protecting human health, Facilitating collective negotiation and freedom of association, Promoting a culture of respect for human rights and creating awareness on this subject among employees, and Protecting the privacy of personal data

Recruitment Policy – a robust recruitment policy, including conducting an eligibility to work in the UK check for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will

Equal Opportunities Policy – a range of controls to protect staff from poor treatment and / or exploitation, to comply with all applicable laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities

Whistleblowing Policy – so employees know that they can raise concerns about how colleagues or people receiving Konecta UK Ltd services are being treated, or about practices within the business or supply chain, without fear of reprisals

Standards of Business Conduct – this code explains the manner in which Konecta UK Ltd behave as a corporate entity and how employees are expected to act

Group Supplier Standards of Business Conduct – this code explains the manner in which our Suppliers and Sub contractors must behave as a corporate entity and how their employees are expected to act

Group Corporate Responsibility and Sustainability Policy - this policy incorporates the Konecta UK Ltd principles of action that set the standards of behaviour related to 4 main action areas: Corporate Governance, Human Capital, Social Action and Commitment to the Environment

Commitment to Universal Declaration of Human Rights and the guiding principles of the UN Global Compact, to which Konecta UK Ltd has adhered since 2004.

Due Diligence Processes

Konecta UK Ltd uses a number of approaches to identify modern slavery risks :

- **Risk-Based Supplier Assessments** – We assess suppliers based on a number of risk factors
- **Pre-Engagement Questionnaires** – Suppliers are required to complete due diligence questionnaires that assess their labour practices, compliance measures, and internal policies.
- **Third-Party Audits and Site Visits** – Where appropriate, we will conduct audits or request third-party verifications to ensure supplier practices align with our standards.
- **Contractual approaches** as described above

Risk Assessment and Management

We conduct annual risk reviews to assess modern slavery risks across our operations and supply chain. Additionally, risk assessments are triggered if/when:

- Konecta UK Ltd onboards new suppliers
- If Konecta UK Ltd entered new markets or regions;
- If Konecta UK Ltd launched new products or services with outsourced components.

If any risk indicators are identified, we work collaboratively with the supplier or partner to implement corrective actions. Where issues remain unresolved or where compliance is not possible, we reserve the right to terminate the relationship.

We also monitor sector-specific risks and emerging trends through external guidance and industry collaboration.

Training

Konecta UK Ltd understands that awareness and education are vital to the effectiveness of our approach. We ensure that relevant personnel receive training that is proportionate to their roles and responsibilities. This includes:

- **Mandatory induction training** for all new employees on ethical business practices and human rights awareness.
- **Annual refresher training** for employees in procurement, legal, HR, and compliance functions, with a focus on identifying signs of modern slavery and acting on concerns.
- **Access to external guidance and e-learning modules**, including updates from NGOs, industry bodies, and government sources.

We continue to review training needs across the business and seek to build internal capacity to manage human rights risks effectively.

Social Action

Konecta UK Ltd promotes in-house and external programmes aimed at achieving the socio-professional integration of people at risk of exclusion, on equal terms.

Establishing strategic alliances with companies, institutions and organisations in the public and private sectors to generate a multiplier effect of their initiatives and capitalise on available business resources

Promoting corporate volunteering initiatives, enabling those working in the organisation to support social causes by giving their time and professional expertise

Effectiveness and Performance Monitoring

Konecta UK Ltd measures the effectiveness of our modern slavery policy through a range of performance indicators and review mechanisms, including:

- **Completion rates of training programmes** and awareness sessions across key functions;
- **Number and outcomes of supplier audits and assessments**, including corrective actions taken;
- **Volume and nature of whistleblowing reports** and the speed of resolution;
- **Policy and process reviews**, conducted at least annually or as legislative changes occur.

The Senior Management Team – Konecta UK Ltd
UK Quality and Compliance Manager – Konecta UK Ltd

October 2024