

Modern Slavery Statement

2024-2025



Introduction

Modern slavery is prevalent across the world. Given the hidden nature of the crime, it is almost impossible to understand the full scope and scale of the issue. As a digital services provider, Shared Services Connected Ltd (SSCL) recognises our supply chain poses the greatest risk for modern slavery and human trafficking, which we are committed to preventing in all our corporate activities and throughout our supply chain.

At SSCL we have a responsibility to ensure that there is no modern slavery or human trafficking in our own business and our supply chain. We respect human rights in all of our operations, acknowledging modern slavery is a systemic issue present in virtually every supply chain. We rely on external suppliers such as professional service providers who are not considered to be at high risk of modern slavery. However, we believe no supply chain is free of risk and that greater risk may be present further down the supply chain with indirect suppliers.

This statement relates to the financial year ending 31st December 2024. It is in accordance with the UK Modern Slavery Act 2015 and UK Government Procurement Policy Note 009 – Tackling Modern Slavery in Government supply chains.

This statement outlines the policies, processes and actions, SSCL has taken to understand and tackle the potential risks to our business from modern slavery.



Organisational Structure

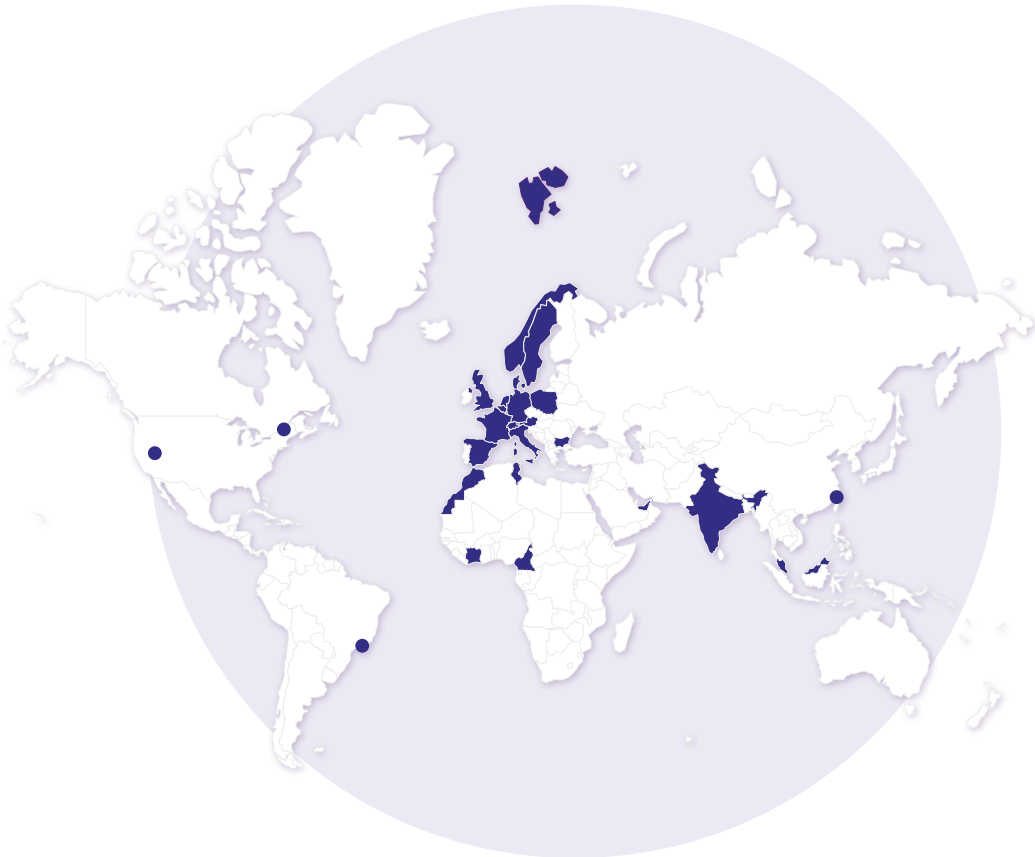
SSCL was founded in 2013 to provide business support services for Government, Defence and Police clients in the UK public sector.

The world is how we shape it. At SSCL, we are harnessing the power of innovation to drive positive change in business and society. Known for our collaborative approach, we provide consulting and digital services, creating innovative solutions at scale, to deliver sustainable growth and services that make life better.

Our work touches many lives in the UK. From helping the Government provide essential public and health services which offer more convenience and choice, to improving financial services to deliver fairer, customer-centric solutions which make a difference for our clients, their customers and our communities. SSCL has approximately 1,500 employees in the UK and is a subsidiary of Sopra Steria Group which has over 51,000 employees in 30 countries.

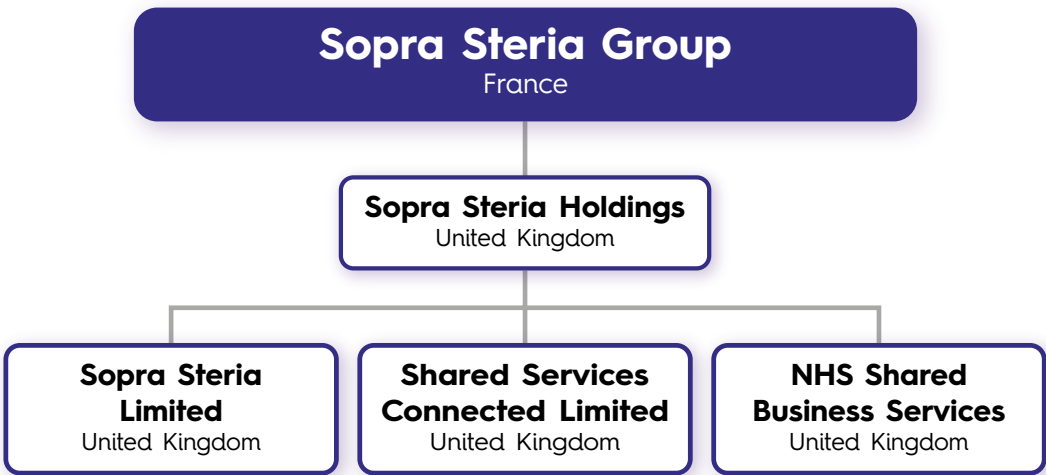
Our locations

- Austria
- Belgium
- Bulgaria
- Denmark
- France
- Germany
- India
- Italy
- Luxembourg
- Netherlands
- Norway
- Poland
- Spain
- Sweden
- Switzerland
- United Kingdom



Together we are proud to be a signatory to United Nations Global Compact including Principle Four: Labour. We also align our company to United Nations Sustainable Development Goals including Goal 8 - Decent work and economic growth. To make sure we are aligned with SSCL's values as an ethical business, we annually assess ourselves using the EcoVadis Corporate Social Responsibility (CSR) assessment. This provides us with an independently verified overview of our environmental, social and governance performance as well benchmarking ourselves against our competitors. For this, we have received EcoVadis' Platinum Award for the sixth year in a row. This ranks us in the top 1% of companies assessed globally against 21 different sustainability criteria which includes our response to modern slavery.

This statement covers the activities of SSCL headquartered in Hemel Hempstead in the United Kingdom. SSCL is part Sopra Steria Holdings which also comprises Sopra Steria Limited and NHS Shared Business Services. Sopra Steria Holdings is part of the Sopra Steria Group based in Paris, France.



Supply Chains

SSCL's supply chain primarily comprises of organisations within UK and Europe, though we recognise our upstream supply chain does include countries with a higher risk of modern slavery and/or human trafficking. We have approximately 260 suppliers in our active supply chain. We use due diligence questionnaires as well as an annual supplier engagement survey to collaborate with suppliers to gather responsible procurement evidence, including where relevant, the supplier's modern slavery statement. Where we believe the statement does not comply with UK Home Office guidelines, we will challenge the supplier to make amendments when and where appropriate. We expect our supply chain partners to uphold international labour standards, human rights and apply a risk-based approach to assessing their own suppliers.

Relevant Policies

SSCL is aligned to Sopra Steria policies, and we apply SSCL-specific policies where appropriate. The following policies outline the steps SSCL have taken to prevent modern slavery and human trafficking in our own operations and supply chain.

All policies are communicated to employees as part of the induction programme and any updates or new policies are included within our Business Management System which is accessible and promoted to all employees.

- **Code of Ethics** – This underpins our approach to transparency, fairness and loyalty towards our customers, employees, suppliers and others in wider society. The Code of Ethics is aligned to 10 principles of United Nations Global Compact. This includes fighting against child labour and exploitation, forced labour or any other form of compulsory labour.

- **Responsible Procurement Policy** – This policy applies to all procurement activities in the UK and requires we adhere to social, ethical, human and labour standards in the procurement of goods and services. Similarly, this is also reflected within our standard supplier terms and conditions as well as our Supplier Code of Conduct. These both require suppliers to uphold human and labour rights and legislation to prevent modern slavery and human trafficking in their own operations and supply chains.
- **Sustainability Policy** – our Sustainability Policy, in conjunction with its Sustainability Framework, allows us to be part of a more sustainable economy and community, have more engaged employees and forge better relationships with our stakeholders. This is achieved by aligning our strategy, objectives, policies

and practices with the highest standards of environmental and social sustainability. This includes championing the human and labour rights of our employees and fighting modern slavery.

- **Policy for Recruitment and Selection** – We only use specified, reputable employment agencies to source labour. We always confirm the recruitment practices of any new agency before accepting workers from them. All candidates must go through a verified right to work check. In the UK, a requirement to comply with Modern Slavery Act 2015 is contained in our supplier contracts and is revisited in regular supplier review meetings.
- **Equal Opportunities and Diversity Policy** – This defines our commitment to establishing and maintaining a working environment which is free from discrimination, and which values all employees as individuals.



EcoVadis: Platinum

In 2024 Sopra Steria Group achieved Platinum status again. We are now recognised in top 1% of organisations assessed globally, 5th year in a row.



Living Wage Accredited: Employer

SSCL have been Living Wage accredited for the past four years.



International Labour Organization

At SSCL, we ask our Supply chain partners to make sure neither they nor their suppliers use child labour and that their employment of young workers adheres to the International Labour Organisation's standards and local regulations.

Due Diligence:

Within our own Operations

SSCL is committed to preventing modern slavery and human trafficking and has policies and processes in place to ensure that our employees are not being exploited and that they have a safe and supportive working environment.

To support this, we have taken the following steps:

- All employees have a contract of employment. It sets out rights and obligations arising from their employment including the notice period needed for them to terminate the contract and leave our employment.
- Employees are free to serve notice to SSCL at any time.
- We conduct pre-employment checks including verification of an employee's identity and ongoing right to work in the UK.

- We do not withhold any employee's identity documents including their passport during their employment.
- We comply with/provide enhanced versions of all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness, maternity/paternity leave, minimum rest breaks and periods. These policies are communicated to all new employees during their induction process.
- Any updates or new policies are communicated to all employees through Group wide communications raising awareness of their employment rights.
- We respect the right of individual employees to join a trade union. Where groups of employees elect to be represented by a trade union, we are committed to engaging with trade unions in pursuit of harmonious industrial relations.
- SSCL provides all employees with access to a whistleblowing process, allowing them to report any concerns including breaches of human rights and human trafficking. To date, we have not had any instances of an employee reporting a suspected case within our company. No cases of modern slavery have been reported despite efforts to identify potential cases.
- SSCL have been Living Wage accredited for the past four years. We voluntarily pay all our employees the Real Living Wage including those employed by our property and facilities providers. We have also set an expectation in our Supplier Code of Conduct for our suppliers to pay the Living Wage or to work towards achieving Living Wage accreditation.



SSCL is aligned with United Nations Sustainable Development Goals which includes Goal 8 - Decent work and economic growth.

“Unseen is proud to have partnered with SSCL in the creation of their new mandatory e-learning module and on the development of their organisation’s Modern Slavery Statement. Understanding modern slavery is the first step toward tackling it. By working with anti-slavery experts Unseen, SSCL is demonstrating its commitment to tackling exploitation. Together, we can drive meaningful change and create a future free from modern slavery.”

Annie Evans, Business Engagement Manager, Unseen



Within our supply chain

At SSCL, we recognise our supply chain contributes the greatest risks for modern slavery and human trafficking. As a result of this, our relationship with the supply base is a critical part of our commitment to eliminating modern slavery and creating a healthy and diverse supply chain.

Annually SSCL procure more than £117m of goods and services, of which 98% is with organisations based in the UK, 1% with companies based within European Union and North America and less than 1% from the rest of the world.

The following table contains information regarding instances of modern slavery in countries where SSCL operates or has suppliers.

Country	Number of people per 1000 estimated to be in Slavery.	Number of people estimated to be in Slavery.
United Kingdom	1.8 in every 1000	122,000
USA	3.3 in every 100	1.1 million
France	2.1 in every 100	135,000
Germany	0.6 in every 100	47,000
Ireland	1.1 in every 100	5,000
India	8.0 in every 100	11 million
Romania	7.5 in every 100	145,000

Source: Unseen, 2025.

SSCL’s key categories of spend are:

- IT Services
- Consultancy and Contractors.
- IT equipment

SSCL recognises IT equipment has a higher level of modern slavery risk based on products raw materials’ country of origin and industry type. It would therefore require higher levels of modern slavery due diligence. We are looking to address this risk in 2025.

Supplier Engagement

Our modern slavery supplier engagement programme for all suppliers includes:

- An assessment of every new supplier during the onboarding process which includes acceptance of our Supplier Code of Conduct and our standard Terms and Conditions.
- Our Supplier Code of Conduct mandates our Suppliers comply with a set of obligations which include,
 - Making sure neither they nor their suppliers use child labour and that their employment of young workers adheres to International Labour Organisation’s standards and local regulations.
 - Confirming neither they nor their suppliers use debt bonded labour in their operations.

- The Supplier Code of Conduct is reviewed annually and on an ad hoc basis to make sure it is relevant and contains clear obligations for our supply chain partners.
- Using EcoVadis to assess and monitor our key suppliers against 21 different areas related to social, environmental and ethical responsibility in the supply chain. We gather data on our suppliers’ labour standards and fair business practices within their own organisations and supply chain. This assessment allows us to identify areas of concern and provides our supply chain partners with a corrective action plan, allowing us to collaborate with openness and transparency.
- Working closely with suppliers. If SSCL were to identify a suspected case of modern slavery, we

would investigate and make sure appropriate procedures are followed within a given timeframe. If we are not satisfied with the result, we will consider the termination of business relationships or contracts with suppliers who fail to act on our recommendations.

- Being a signatory to the Prompt Payment Code which set out standards for payment best practice and reduces the risk of late and extended payments to suppliers. We are applying to be a signatory to the new 2025 Fair Payment Code which now includes additional controls related to fair and transparent financial practices in supply chains. Our standard payment terms continue to be net 30 days which reduces pressure on suppliers that could increase the risk of creating modern slavery scenarios.

Training and Awareness-Building

At SSCL, we know how vital it is that our employees understand the issue of modern slavery, can recognise the signs and report potential instances in our operations and supply chain. We have undertaken the following training and awareness building activities to address this.

- We upskill all employees, including Contractors, on modern slavery and human trafficking, using a mandatory online training module. It raises employees' awareness of their individual rights as well as how to spot and report signs of modern slavery in the organisation and supply chain.
- During 2025, we will be launching a new mandatory modern slavery e-learning module. We have collaborated with Unseen, a specialist Modern Slavery Charity to improve, develop and update our mandatory modern slavery e-learning module, as well as our overall approach to identifying and mitigating the risks of modern slavery within our business.
- We provide additional enhanced training to employees in roles such as Procurement and Facilities Management, who deal with suppliers providing services which we have been identified as being at higher risk of modern slavery.
- As part of our 2024 supplier engagement programme, we upskilled 46 members of the wider procurement team on responsible procurement which included modern slavery.
- As part of a regular fortnightly cross functional meeting, we trained approximately 100 additional colleagues on our modern slavery activities.



Activities undertaken this Financial Year

- We continued to add our Modern Slavery Statement to the UK Government's Modern Slavery Statement Registry to allow complete transparency of our operations. Our statement last year (2023), met all the UK Government's recommended criteria, demonstrating improvement from previous years.
- We completed the UK Government's Modern Slavery Assessment Tool Survey (MSAT) – in which we achieved a 95% result.
- Our dedicated Sustainable Supply Chain specialist:
 - Focuses on all aspects of Responsible Procurement including modern slavery which has resulted in greater modern slavery due diligence overall within our supply chain operations.
- Represents SSCL at the Business Services Association (BSA)'s Modern Slavery Council.
- Is a member of techUK's Responsible Business Conduct Group. As part of this, has contributed to the UK Government's Joint Committee on Human Rights inquiry into Forced Labour in Supply chains.
- Has provided pro-active modern slavery due diligence activities on Client accounts.





Case Study: Facilities Management Tender

At SSCL, we make sure modern slavery risks are considered during all stages of the procurement life cycle, including tender evaluation, contract award and in-life contract management.

As a result of our independent risk assessment with Stop the Traffik in 2023, SSCL’s cross-entity Procurement Working Group recognised Facilities Management as one of the few areas in our direct supply chain where there is a greater inherent risk for modern slavery. With these findings in mind, when undertaking a re-tender of our Facilities Management Service in 2024, it was essential that any supplier was aligned with our commitment to mitigate the risk of modern slavery. We engaged closely with prospective bidders to understand their overall approach to Social Value as well as their modern slavery activities and commitments to ensure that the successful bidder was fully committed and in alignment with us.

Key Performance Indicators

We have in place the following key performance indicators (KPIs). These indicators and activities are reviewed annually.

KPI Categories	KPI 2025
Supplier Engagement	100% of our suppliers to have agreed to our Supplier Code of Conduct.
	100% of annually targeted suppliers to have completed the EcoVadis sustainability assessment.
Modern Slavery Training	100% of all existing employees, new employees and contractors to complete mandatory modern slavery training every two years.
	100% of employees who have roles dealing with suppliers, such as the Procurement Team, to receive ongoing updates regarding human rights and modern slavery.



Responsibility

Responsibility for activities related to modern slavery and human trafficking are as follows

Individual / Department	Title	Responsible for:
Human Resources	Director of Human Resources	Policies related to the prevention of modern slavery and human trafficking in our own operations.
Chairman	Sopra Steria Group SA (France)	Sopra Steria Group Code of Ethics.
Procurement	Procurement Director	Policies related to the prevention of modern slavery and human trafficking in our supply chain.

Leadership and Governance

In our own operations, the Human Resources Team are responsible for ensuring that all due diligence checks are undertaken during all stages of employment from initial recruitment onwards.

In our procurement and supply chain management activities, our Procurement Management team are responsible for undertaking due diligence and activities related to the prevention of modern slavery and human trafficking. In these processes, they incorporate input from other parts of the business including Legal, HR and Environment and Sustainability.

Board Approval

SSCL’s Board of Directors has approved this statement for the Financial Year ending on 31st December 2024.

Director’s signature: 

Director’s name: John Neilson

25 June 2025

Date

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