



Webhelp

Modern Slavery

Statement

2020

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Opening Statement

Webhelp operates with a high level of social responsibility, and our determination to conduct business in an ethical, fair and enlightened way challenges us to be better for our people our clients and the communities that we operate in.

As a responsible employer and in line with our values of commitment and integrity we are committed to complying with the Modern Slavery Act (MSA) 2015 that requires organisations supplying goods or services to prepare and publish an annual “Slavery and Human Trafficking Statement”.

This statement sets out our actions to understand potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in or connected to our business.

This statement relates to actions and activities during the financial year January 2019-December 2019 and has been approved by the Webhelp UK Board



Our Business

At Webhelp we are a global community of passionate game changers who build human experiences and shape business solutions. Webhelp UK is part of the wider Webhelp Group that employs more than 50,000 people in 90 different locations, across 26 countries.

We enrich customer experience and business solutions to create lasting value for the world's most exciting companies from helping our clients to build smarter, better, human customer experiences, to moderating their social media, and providing payment services. Everything we do for our partners (in business); we do with our partners.

In order to provide our clients with customer experience solutions, we work with a range of suppliers. We have a direct relationship with the majority of our suppliers that have a base in the United Kingdom.

Our culture is key in our business, and with our rebrand in 2019, we have refreshed our set of behaviours and mindsets that guides our company culture.



We are
a people-first
company



We are
passionate
game-changers



We put our
client at
the heart



We strive
to enjoy
every day

Our key principles

Our principles guide us to make sure we are operating in an ethical manner and at ensuring that there is no slavery or human trafficking in or connected to our business.



Fair and legal recruitment practices

We ensure that we recruit and select employees in a fair and lawful way, ensuring that candidates have the right to work.



Ability to raise concerns

We ensure that our colleagues can raise serious concerns within Webhelp without fear of retaliation and discrimination.



Adherence to employment laws

The employment models that we use are guided and in line with country specific laws and regulations.



Supplier selection

We take a fair and consistent approach to selecting our suppliers.



Salaries

We ensure we pay our colleagues at least the legal minimum wage in the countries in which we operate.



Supplier due diligence

We ensure the suppliers we work with are conducting their business in an ethical manner.

Our Policies and Procedures

As part of our commitment to combating modern slavery, we have a number of policies which are reviewed annually and support our process to combating modern slavery within our business and our supply chains.



Protecting our People

Global Code of Conduct

Our Global Code of Conduct has been reviewed and refreshed. This applies to all colleagues and it helps us adopt the right behaviours when facing challenges, and is an essential reference in relation to ethics, social and environmental responsibility, and financial and legal compliance.

Recruitment Policy

Makes sure we have an appropriate process in place and that the necessary checks are outlined to be carried out for candidates. Our vetting procedure shows in detail the necessary checks and requirements needed for specific roles.

Vetting Guidelines

Ensures that successful candidates are taken through the correct vetting procedures. Our vetting guidelines set out our internal requirements but also incorporate any client specific requirements and follow the regulations of the FCA where applicable.

Anti-Bribery and Ethics Policy

Ensures that all our employees, temporary workers, consultants, contractors, agents and subsidiaries acting on Webhelp UK maintain the highest standards of business conduct and operate with integrity.

Whistleblowing Policy

Ensures, encourages and enables employees to raise serious concerns within our business. This includes mismanagement, wrongdoing or violations of our Code of Conduct.

Our Policies and Procedures continued...



Ensuring our supply chains are robust

At Webhelp UK, we work with different suppliers to provide customer solutions for our clients. We have a strong framework in place to ensure the suppliers we work with are competitive within their marketplace and conduct their business' in an ethical manner.

Procurement Policy

Webhelp is dedicated to ethical, sustainable and environmentally safe business practices and services. Our procurement policy requires our contracted suppliers at all times to conduct their business in an ethical and socially responsible manner, comply with all applicable laws, regulations and standards, have the rights and best interests of the supplier's employees (including the working conditions), the impact of the supplier's business on the environment and the role in its local community.

New Supplier Process

At Webhelp, we continually monitor and take steps to reduce supply chain risks, where it is a mandatory requirement for all suppliers to either complete the New Supplier Questionnaire or sign our Supplier Declaration.

The business is enabled to undertake some procurement activity directly with support from the procurement department. A supplier justification form is to provide details on why each supplier is selected. Webhelp requires a minimum of 3 quotes are gained where possible to ensure sufficient competition is being consistently introduced to all supply chain choices.

Webhelp's procurement department leads or supports all tenders which ensures robust, fair, consistent and ethical tendering activity. This is achieved through the use of templates and processes which focus on the responses provided by suppliers to develop a recommendation for supplier selection based on key business drivers.

Risk Mitigation

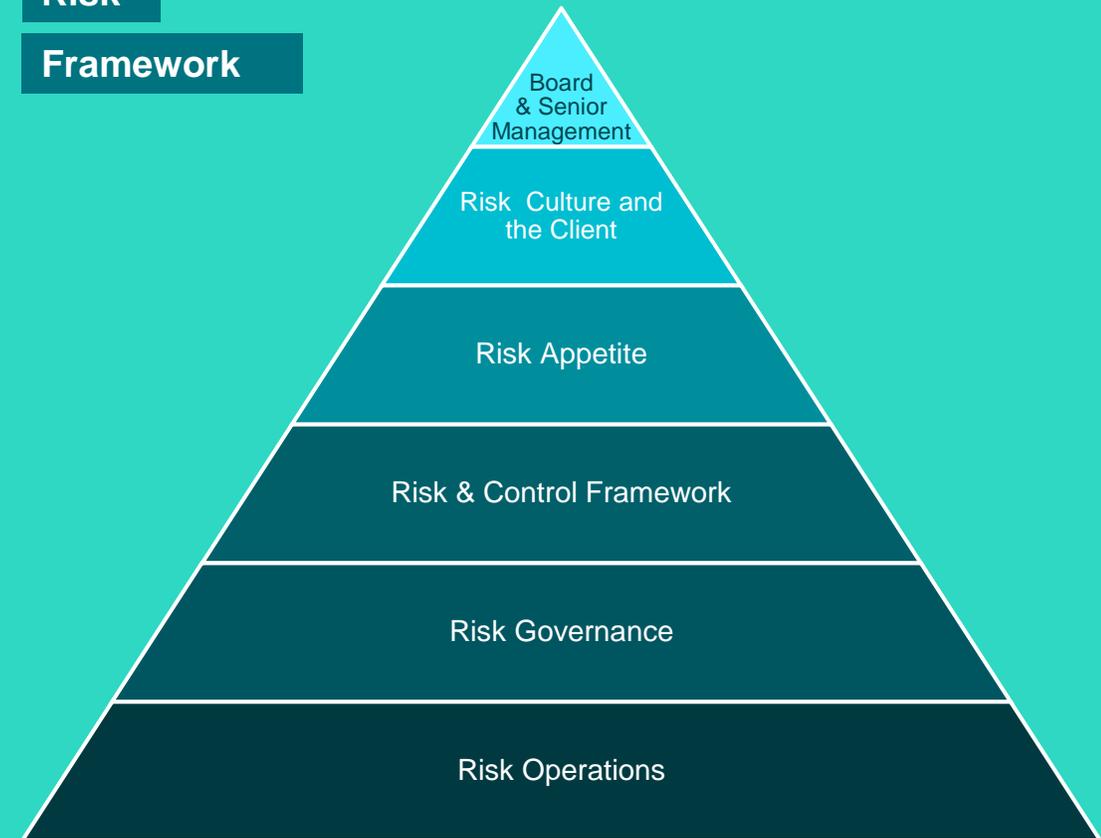
In the past year we have strengthened our risk management framework, guidance and processes. We continually identify, assess and manage risks in line with our new risk framework ensuring that effective controls are in place to mitigate any risks identified across the business. We promote a culture of doing the right thing, from our advisors to our senior leaders where mitigating risk is part of all our day to day roles.

At Webhelp, we create an environment where employees are encouraged and enabled to raise serious concerns, with several ways to report concerns, which is outlined in our Whistleblowing policy.

Internally, we conduct assurance reviews to ensure that we are operating in line with the policies and expectations that are set out.

Webhelp UK is ISO certified, this means that independent checks and audits have been completed by an external body. For ISO27001 & IS9001, these audits include supplier management and recruitment policies and process checks to ensure they are operating as expected.

Risk Framework



Looking ahead

This year, we will continue strengthening our controls to prevent slavery and human trafficking from occurring in our business and our supply chains.

We will continue to:

- Raise awareness through communications to all our colleagues through our global information sharing system (WISE)
- Annual review of all our policies outlined in relation to combatting slavery and human trafficking
- Conduct compliance reviews on recruitment and vetting to ensure processes are being adhered to

In addition, we will be:

- Rolling out all colleague training of 'Doing the right thing' which includes ways in how to escalate concerns
- Update our Global Code of Conduct
- Our Policy and knowledge workbook enhanced with annual refresher sessions progressed by all employees is being redesigned to go live in our new e-learning platform

This statement is made in accordance with the Modern Slavery Act 2015 and Human Trafficking and Exploitation Act 2015 and has been approved by the UK Board.



David Turner

Chief Executive Officer
Webhelp UK Region





Think Human

