

Modern Slavery and Human Trafficking Statement 2023





The information in this statement, signed by our Chief Executive Officer, Jon Lewis, details the policies, processes and actions Capita has taken to mitigate the risk of modern slavery and human trafficking in our supply chains and any part of our own business.

It covers the activities of all businesses in all jurisdictions within the Capita plc group of companies¹ (Capita) and is Capita's Modern Slavery Statement for the financial year ended 31 December 2022, required under the provisions of the Modern Slavery Act 2015 (the "Act").

¹The list of all entities is included on page 224 of [Capita's Annual Report](#)

Our commitment

Slavery is illegal everywhere in the world, but despite that, there are currently an estimated 50 million people in modern slavery or victims of human trafficking across the globe². Out of the millions of people trapped in modern slavery, 28 million were in forced labour, so it is paramount that businesses take action to end these abhorrent practices.

We are committed to playing our role by ensuring through our management and operations that we have the systems, policies and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for Capita benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

Visit our Annual Report for more information: [Click here](#).

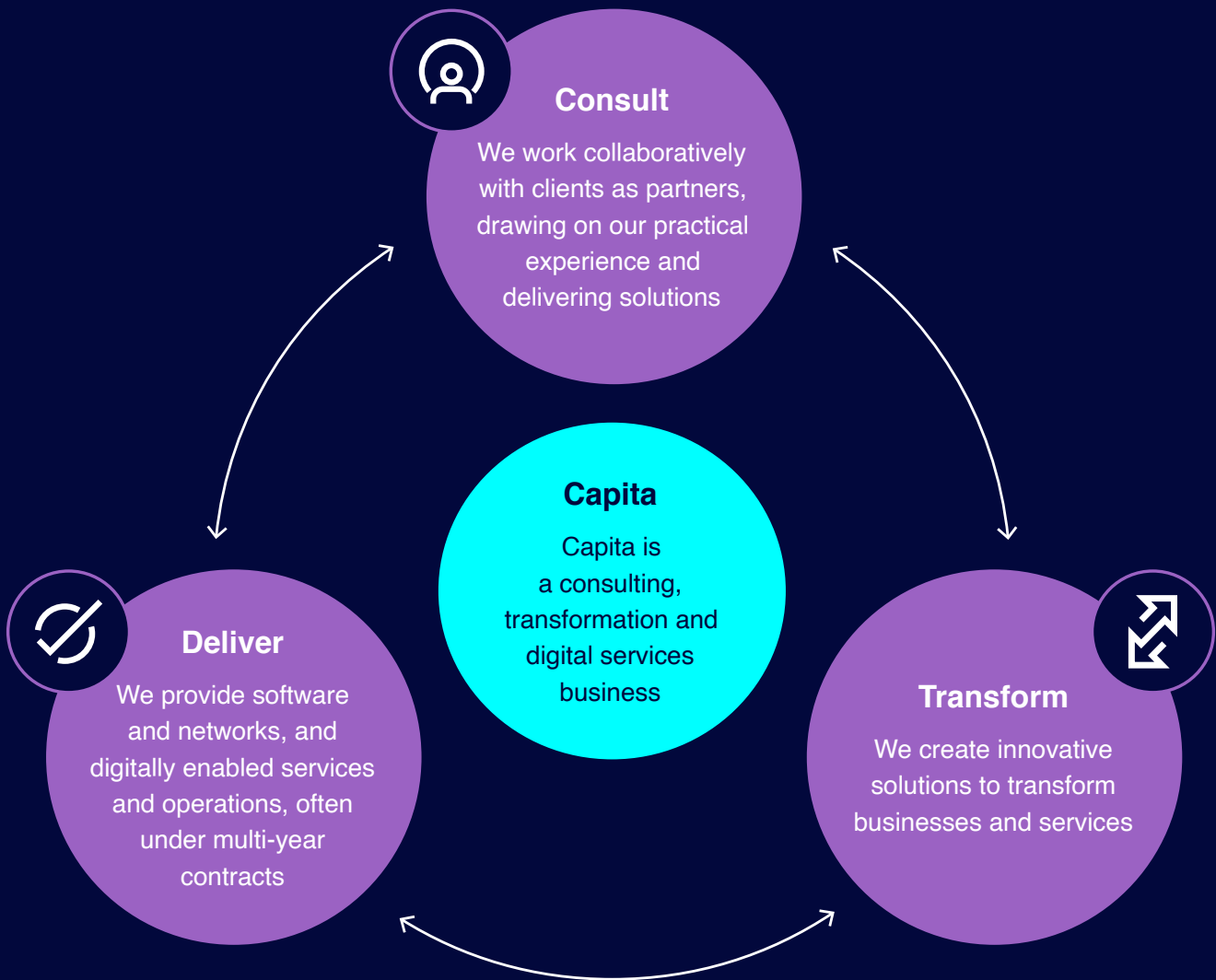


² www.walkfree.org/global-slavery-index/

Our business and structure

Capita is a leading provider of business process services, driven by data, technology and people. We are a purpose-led, responsible organisation. Every day our 50,000 colleagues help millions of people, by delivering innovative, digitally enabled solutions to transform and simplify the connections between government and citizens, businesses and customers.

We partner with clients and provide them with the insight and technologies that allow them to focus on what they do best and make peoples' lives easier and simpler.



Our divisions

We operate across two core divisions – Public Service and Experience – in the UK, Europe, India and South Africa; a third division, Portfolio, comprises our remaining non-core businesses being prepared for disposal. The divisions are supported by a common set of company-wide capabilities and functions.

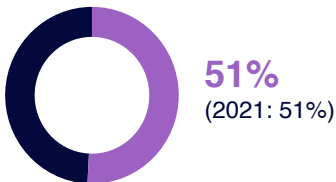
Capita Public Service

The number one⁴ strategic supplier of business process services (BPS) and technology services to the UK Government.

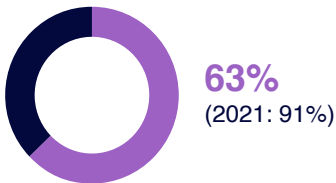
Main verticals:

Education & Learning; Local Public Services; Health & Welfare; Defence, Fire & Security; and Justice, Central Government & Transport.

Adjusted revenue³ contribution



Adjusted divisional operating profit³ contribution



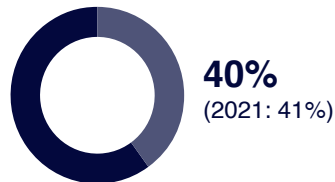
Capita Experience

Experience is one of western Europe's leading customer experience businesses. It is the market leader in the UK⁵ and ranks fifth in Germany⁵ and Europe⁵.

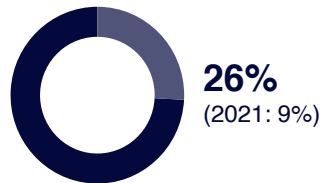
Main verticals:

Telecoms, Media & Technology; Multi-industry; and Financial Services.

Adjusted revenue³ contribution



Adjusted divisional operating profit³ contribution



Capita Portfolio

Remaining portfolio of valuable but non-core businesses, targeting sale by half year 2023, depending on market conditions.

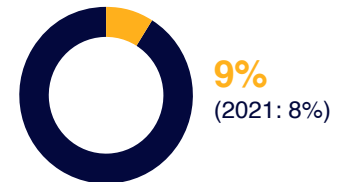
Pillars:

People; Software; Business Solutions; Travel; and Fera.

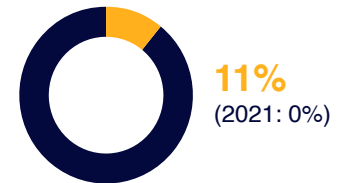
Sold during 2022:

Technology, Property.

Adjusted revenue³ contribution



Adjusted divisional operating profit³ contribution



³ Refer to APMs on pages 229 to 231 in our [Annual Report](#).

⁴ TechMarketView.

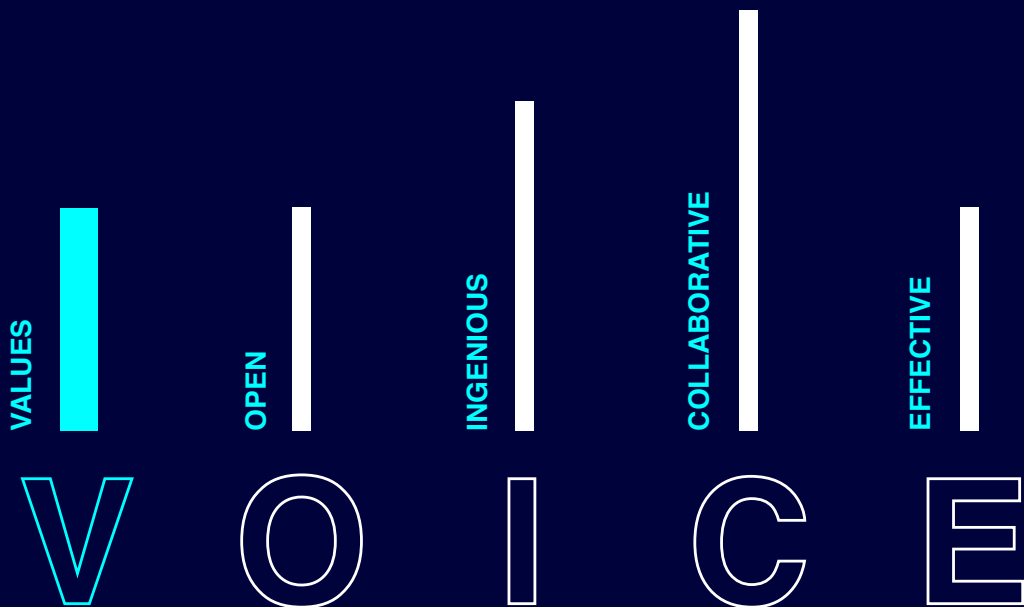
⁵ NelsonHall.



Our purpose and values

We are driven by our purpose: to ‘create better outcomes’ – for our colleagues, clients and customers, suppliers and partners, investors, and society. We are committed to being a responsible business – in how we operate, serve society, respect our people and the environment, and deliver improving returns to our investors. Everyone at Capita strives to create better outcomes for all our stakeholders by living our values of being open, ingenious, collaborative and effective. We bring these values to life through our day-to-day behaviours and by putting our purpose at the centre of everything we do.

Our values and behaviours remain more relevant than ever.



Our values define who we are as an organisation

We are honest transparent and respectful

We think about what's possible

We achieve more when we work together

We care about doing the best job we can



Our stakeholders

Capita is a purpose-led organisation that exists to create better outcomes for all our stakeholders. This includes our people, clients, customers, suppliers and partners, as well as investors and civil society organisations.

Stakeholder	What matters to them	How we engage with them
Our people	<ul style="list-style-type: none"> • Flexible working • Learning and development opportunities leading to career progression • Fair pay and benefits as a reward for performance • Two-way communication and feedback 	<ul style="list-style-type: none"> • People surveys • Regular all-employee communications • Employee director on the Capita plc Board • Employee focus groups and network groups • Workforce engagement on remuneration • Leadership Council • Regular 'breakfast' sessions with the Executive Committee for our colleagues
Clients and customers	<ul style="list-style-type: none"> • High-quality service delivery • Delivery of transformation projects within agreed timeframes • Responsible and sustainable business credentials 	<ul style="list-style-type: none"> • Client meetings and surveys • Regular meetings with government stakeholders and annual review with the Cabinet Office • Creation of Customer Advisory Boards • Created a senior client partner programme giving an experienced single point of contact for key clients and customers
Suppliers and partners	<ul style="list-style-type: none"> • Payments made within agreed payment terms • Clear and fair procurement process • Building lasting commercial relationships • Working inclusively with all types of business 	<ul style="list-style-type: none"> • Supplier meetings throughout source to procure process • Regular reviews with suppliers • Supplier questionnaires and risk assessments
Investors	<ul style="list-style-type: none"> • Reporting on strategic, operational and ESG factors • Financial performance • Directors' remuneration, access to the Board and senior management • Regular communication 	<ul style="list-style-type: none"> • Financial and other reports and trading updates • Regular investor programme with the Board, including meetings with the Chairman and Remuneration Committee chair and feedback throughout the year • Discussions around AGM on resolutions and governance topics • Dedicated investor relations contacts and email inbox • Regular Board reports from investor relations function and external advisers
Society	<ul style="list-style-type: none"> • Social mobility • Youth skills and jobs • Digital inclusion • Diversity and inclusion • Climate change • Business ethics • Accreditations and benchmarking • Cost of living crisis 	<ul style="list-style-type: none"> • Membership of non-governmental organisations • Charitable and community partnerships • External accreditations and benchmarking • Working with clients, suppliers and the Cabinet Office



We recognise that there are risks in relation to modern slavery and human trafficking outside of our core stakeholder groups. That is why we work closely with other partners such as recruitment agencies and trade unions to mitigate those risks:

Recruitment agencies

In 2022 we recruited, or supported internal movement for, more than 27,600 people through our internal resourcing team and via external recruitment partners. We work with a managed service provider in the UK and multiple partners in other locations who undergo our rigorous due diligence assessment to ensure that they are recruiting in line with our policies and values, and that they apply inclusive and value-based recruitment practices.

Trade unions

Capita takes a partnership approach to union relations as we believe it adds value to all the stakeholders and relationships concerned. We also believe it provides our colleagues and our recognised unions with genuine opportunities to contribute to the future success of our organisation.

We operate many of our contracts in unionised environments and an essential part of our approach is to maintain proactive and constructive relationships with those groups. To achieve this, we meet with recognised trade unions for example Unison, Communications Workers Union (CWU) and Unite, in line with the collective agreements in place, as determined, on a regular basis. Matters for discussion can include business performance, strategy and resolving local issues.

Our people

Capita has a workforce of more than 50,000 people employed in 11 countries. Having a professional, engaged, inspirationally led and supported workforce is critical to our ability to successfully create better outcomes for all our stakeholders. Most of our employees work a hybrid schedule or are home-based and our operations do not require seasonal workers.

Employee headcount - 2022:

Headcount per country	Total
Germany	3,933
India	6,419
Ireland	1,203
Isle of Man	58
Poland	643
South Africa	4,887
Switzerland	1,116
United Arab Emirates	104
United Kingdom	31,625
Bulgaria	49
United States of America	10
Total	50,047

Our clients and sectors

We work across a range of sectors, partnering with our clients and providing them with the insight and cutting-edge technologies that allow them to focus on what they do best, making peoples' lives easier and simpler.

Capita Public Service is the number one strategic supplier of Software and IT Services (SITS) and Business Process Services (BPS) to the UK Government:

-  Education & Learning
-  Local Public Services
-  Health & Welfare
-  Defence, Fire & Security
-  Justice, Central Government & Transport

Capita Experience is one of western Europe's leading customer experience businesses. It is the market leader in the UK and ranks fifth in Germany and Europe:

-  Telecoms, Media & Technology
-  Financial Services
-  Energy & Utilities
-  Retail

Our supply chain

With 19,000 suppliers, we recognise that Capita's supply chain is critical to our success and is also primary risk area. We therefore seek to build lasting relationships, treating our suppliers fairly and paying promptly. We want to work with suppliers who share our values and support us in delivering our purpose to create better outcomes.

We are committed to working with our supply chain to ensure that together we can achieve wider social, economic and environmental benefits, and safeguarding colleagues especially those most at risk to labour exploitation, and vulnerable or disadvantaged families who face barriers to sustainable employment and income.

We spent more than £1.98bn in 2022 with 19,000 direct suppliers in 69 countries, 83% of them are based in the United Kingdom. 3% of our suppliers originate from twenty two countries with a high risk of modern slavery as per the [Global Slavery Index](#), with 90% of these suppliers originating in India.



£1.98bn

Capita spend with suppliers



83%

of our suppliers based in the UK



19,000

direct suppliers in 69 countries

Annually, we benchmark ourselves against external indices to ensure our approach to responsible business is appropriate for our organisation and in line with industry best practice.

For example, we actively participate in the S&P Global Corporate Sustainability Assessment (CSA) and EcoVadis. In 2022 our ranking in the CSA improved slightly by one point and we maintained a silver rating in the EcoVadis assessment. Both CSA and EcoVadis assess our approach to labour and human rights, which includes our response to modern slavery.

We also partner with organisations which share our values and support responsible business practice, including modern slavery activities. Our memberships include Business in the Community, The Good Business Charter (an initiative developed in partnership with the Confederation of British Industry and Trade Union Congress of which Capita was the first accredited business), and the Employers Network for Equality and Inclusion.



Governance and policies

Our governance

Our commitment to human rights and the eradication of modern slavery is overseen by our senior leadership team. Overall accountability is held by Capita's Executive Committee, which consists of functional heads and executive officers who are entirely accountable for their division and function, including Responsible Business, Human Resources and Procurement.

Both Capita's Chief Executive Officer, Jon Lewis, and the Environmental Social and Governance (ESG) Sub-Committee of the Capita Board have final sign-off of this Statement.

Our policies

The following company policies support us in mitigating the risks of modern slavery in our business and supply chain. They are available to all colleagues via our intranet site and website. The policies are managed by relevant functional heads such as HR, Procurement and Responsible Business, and are embedded in our company-wide risk management framework.

Code of Conduct >

(The Code) describes what we must do and how we must behave to ensure we have the trust of all our stakeholders. It details how we will create better outcomes in the right way, not at any cost, in line with our purpose and values. The Code applies to everyone who works at, or with, Capita. It summarises in one place elements of our key policies, and the standards and procedures which support them. All Capita employees are required to complete mandatory Code of Conduct training annually.

Speak Up Policy >

Sets out our commitments to speaking up about serious concerns, detailing how any person working at or with Capita, including those employed in our supply chain, can raise concerns or 'whistle blow' and the channels available to do so confidentially, responsibly, effectively and without fear of repercussions. This policy is supported by our [Speak Up Standard](#) and a [fully anonymised online portal](#) which is promoted and accessible to all stakeholders. The portal includes geographically appropriate telephone numbers, run by an independent third party on behalf of Capita. We also run a related 'Disclosure and Whistle blowing' compliance training programme for identified colleagues operating in regulated areas of Capita.

Supplier Charter >

Sets out the principles of how we will conduct business in an open, honest and transparent manner, and the behaviours and practices we expect of our suppliers and partners. This includes specific reference to our expectations for our suppliers to never use or support practices that inhibit the development of children, not hold an individual nor group in slavery or servitude, not use any form of involuntary labour, nor traffic individuals or groups for the purpose of labour exploitation in line with the Modern Slavery Act. We expect all our suppliers to report any issues of compliance with our charter to us within five working days, or any shorter period required by regulation. We expect all our suppliers' colleagues or contractors to report any breaches through their own grievance mechanism, or directly to Capita.

Diversity and Inclusion Policy >

Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated. Our policy is supported by a mandatory Diversity and Inclusion training module for all colleagues that needs to be taken annually.

Anti-racism, Discrimination, Harassment and Bullying Policy >

Capita has a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment, bullying and all forms of exploitation with a clear procedure to follow for any reported acts or behaviour that goes against our commitments. Referenced in our Diversity and Inclusion mandatory training module, there is also a mandatory compliance Anti-Racism training module for all UK and Ireland employees.

Wellbeing Policy >

Sets out our commitment to prioritise and create working environments that protect, support, and promote the wellbeing of all our colleagues, managing any factors that may cause negative emotional, psychological, physical, or social impacts. We expect everyone to utilise the tools and resources available to them to help look after their own wellbeing and support the wellbeing of colleagues. Wellbeing is referenced in our Health, Safety and Environment annual training.

Safeguarding Policy >

Sets out our commitment to safeguarding our colleagues, any other adults at risk or children who come into contact with us, during work related activities. Safeguarding relates to promoting the welfare of adults at risk or children and protecting them from harm. We are committed to providing the necessary training to our colleagues, fulfilling our legal and regulatory requirements, and providing a safe, efficient and confidential process for reporting and managing any safeguarding concerns or issues.

Procurement Policy >

Sets out what our suppliers should expect from us when we buy goods and services and the requirements that must be met by every one of our businesses, in every country where we operate, when doing so. This includes operating responsible business procurement practices with clear and fair procurement processes and paying promptly in accordance with payment terms, monitoring our supply base in accordance with our Supplier Charter and providing a framework for ongoing assurance of business resilience activities with our suppliers.

Human Rights Policy >

Ensures appropriate procedures are in place to mitigate the risk of potential breaches of international human rights standards, including the United Nations' Universal Declaration of Human Rights (UDHR), the International Labour Organisation (ILO) core conventions on Labour Rights, and the Modern Slavery Act. The Human Rights policy is referenced within our mandatory Diversity and Inclusion, as well as Safeguarding training module.



Supporting our people

Our Human Rights Policy details our commitments to labour and workplace rights. We are further committed to providing fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, freedom of association and employee representation, health and safety, resting time, holiday entitlements and benefits. These are applied according to territory-specific statutory requirements. Our employees' pay will not be lower than that required by local law or, in the absence of a law, the level paid generally within that industry.

Hours of work will be in line with local law or, in the absence of a law, the norm within that industry, and shall not be excessive. Employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis. Forced or compulsory labour is prohibited. Employees will not be forced into involuntary labour and coercion at work is not acceptable.

Financial penalty is prohibited. The employment models deployed will be in line with territory-specific law and practices. Under these practices there will not be excessive use of alternative models, such as subcontracting or labour-only contracting.

Our Human Resources policies set out our commitments to treating our employees fairly. To uphold our position as a responsible employer, we:

- recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates
- treat all employees fairly during their employment
- provide procedures to raise grievances if there is an occasion when an employee does not feel that they have been treated fairly, including involving a local trade union where applicable
- manage the exit of an employee from the business in a fair and consistent manner.

Where non-compliance is found then the necessary steps are taken to ensure that this is managed accordingly. Steps range from additional training on specific subjects through to disciplinary measures if the behaviours and actions are deemed to be serious or willful.

Capita has clear procedures in place for colleagues to raise concerns or complaints about work issues. Capita's commitment includes the provision of a clear approach to raising a grievance, communicated to all colleagues, and that all issues raised will be dealt with fairly and consistently to avoid any claims of discrimination or unfair treatment. Investigations are fully managed, and all hearings held promptly. There is also a fully documented appeal process, with transparent steps in a fully documented Grievance Procedure easily available and accessible to all.



Risk management

All contract risks, including potential human rights, modern slavery and human trafficking risks, are managed and monitored through the contract lifecycle, as per our Corporate Risk Management Framework. This requires rigorous assessment at contract, business unit and divisional level and review at executive level.

We identified two areas of priority risks in relation to modern slavery and human trafficking, one in relation to our colleagues, and another in relation to our suppliers.

Colleagues

At Capita, we have a virtual-first working approach and offer flexible and remote work wherever client and business needs allow. We are aware that this approach could have safeguarding implications for vulnerable colleagues.

To manage the potential risks, the wellbeing of all our colleagues, whether working from home, remotely, in the field or in the office has remained our priority.

Our Wellbeing Policy and Standard ensure we create working environments that protect, and support our colleagues health and happiness. Wellbeing is our priority, and we all have a responsibility to ensure we look after ourselves and each other.

All colleagues are encouraged to ask for help when needed, and we have a range of support options available. We have established a Wellbeing Hub to bring all our resources supporting physical, mental, social, and financial wellbeing together in one convenient and accessible place. We have Employee Assistance Programs or similar support services available to all colleagues globally which provide access to counselling and online resources. In addition colleagues can raise a request for reasonable adjustments if required.

We regularly engage with our people to promote wellbeing events and initiatives, driving a proactive approach to awareness and prevention. This is brought together with a Group Wellbeing Calendar focusing on our key priorities, with the Employee Network Group on Yammer used as a key platform to promote this. We continue to develop our culture, so wellbeing becomes an intrinsic part of everything we do, encouraging managers to have wellbeing conversations with their people as part of their regular check-ins.

Our Safeguarding Policy and Standard set out our approach to protecting our teams, service-users and any member of the public who we have contact with.

All colleagues complete mandatory safeguarding training and regular assurance activities are carried out to ensure that the standard is being complied to across Capita.

In addition, we provide a SafetyNet service - expert independent support and advice to HR partners and line managers across Capita. SafetyNet is a senior multidisciplinary group (medical, HR, HSE, safeguarding and wellbeing) and was launched in 2021 to help manage complex HR situations that relate to the health, safety, wellbeing of team members, for example, those who have attempted suicide. SafetyNet can also provide support for concerns relating to modern slavery.





Suppliers

We have a Supplier Risk Framework for assessing and managing our supply chain risk and have introduced controls to ensure compliance to our Policies and Supplier Charter. This Risk Framework covers the full supplier lifecycle and defines the organisational responsibilities for supplier management.

As part of the implementation of the framework and assessment, we annually review our strategic and high-risk suppliers against our Responsible Business commitments and credit risk.

As part of the Supplier Risk Framework, we undertake rigorous due diligence on all our suppliers and partner with EcoVadis, an independent ratings body, who can assess companies against four themes:

- environment
- ethics
- sustainable procurement
- labour and human rights

We consider the labour and human rights theme as a priority risk area in relation to modern slavery, and as such suppliers are assessed against all aspects of their treatment of their people, including a requirement to provide evidence of how they guard against modern slavery. In 2022:

- Our suppliers with valid EcoVadis scorecards on average scored 65 against the EcoVadis benchmark and 65 on their labour and human rights assessment
- 0.9% of Capita's spend was with suppliers in high-risk countries

The combined effect of Capita's supplier onboarding, due diligence checks, EcoVadis third party audits and our Supplier Risk Management Framework, resulted in zero material breaches occurring.



Due diligence

We work with partners through direct and indirect recruitment channels who must comply with our Supplier Charter and undergo our rigorous due diligence assessment, to ensure that they are recruiting in line with our policies, values and focus on driving inclusive resourcing practices.

As a minimum, we expect both ourselves and our suppliers to comply with all applicable local laws and regulations, providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically, and using environmentally responsible practices where practicable.

We operate a rigorous supplier onboarding due diligence process, to ensure that all new suppliers can adhere to and understand what we expect from them under our Supplier Charter. Continued monitoring of adherence to the Supplier Charter is carried out via an ongoing annual risk questionnaire for strategic and high-risk suppliers. The questionnaire covers the following areas:

- human trafficking and slavery
- anti-bribery and corruption
- equal and fair opportunities
- health and safety
- the environment
- data protection
- risk management
- information security and bribery
- sanctions
- safeguarding and wellbeing

We prioritise suppliers that can demonstrate commitment to upholding responsible business practices. Our tendering process includes an increased weighting for those suppliers that perform well against our required criteria related to modern slavery, environment, diversity and inclusion as well as gated criteria for supplier charter acceptance, anti-bribery & corruption, and financial crime. This takes the form of a mandatory corporate social responsibility questionnaire, which includes a statement supported by evidence of a supplier's commitment to addressing human rights and modern slavery which is reviewed for completeness and compliance.

Our standard terms and conditions include a clause that all suppliers are required to comply with our Supplier Charter under which Suppliers are expected to uphold the highest standards of human and labour rights. We have zero tolerance for modern slavery and reserve the right to terminate a relationship with a supplier or third party that cannot demonstrate compliance with our Human Rights Policy and Modern Slavery Statement.

Additionally, we do not supply any goods that have been identified by the [US Department of Labor](#), to be at higher risk of being produced by child or forced labour.

Training and communication

Training

To make colleagues aware of Modern Slavery Act 2015 we share this statement with all colleagues through our internal communication channels and a copy of this statement is available on the Capita website (www.capita.com).

We also provide training on our policies – please check details in the policy section of our website.

In 2022 we continued to provide an awareness training to all colleagues, both inside and outside the workplace, of our commitments to identify the risks of, and remove all instances of, modern slavery, human trafficking and exploitation. This has been implemented through our mandatory pan-Capita Code of Conduct and Safeguarding training.

We will also be launching more detailed training for colleagues that have direct responsibility for upholding our commitment to eradicating modern slavery from our business and supply chain. This will include our procurement and resourcing teams.

Communication

We seek feedback from colleagues through our annual People and Pulse surveys, which are open to all Capita colleagues.

In 2022, the people survey results showed teams and managers are doing a great job. Trust levels are high within teams, there are regular discussions about performance, and colleagues feel that their managers care about their wellbeing and help them succeed to their full potential.

We also communicate with all our colleagues on a regular basis on number of issues, this includes Group wide communication and campaigns, as well as divisional and local communication, such as All Hands Calls, listening groups and engagement sessions.



Key performance indicators

Our effectiveness in combating slavery and human trafficking

Our Supplier Relationship Management Framework enables the close management and monitoring of our supplier compliance to our Policies, and applicable legislation and regulation and adherence to our Supplier Charter. We assess our supplier's performance across four key Responsible Business themes:

- environment
- ethics
- sustainable procurement
- labour and human rights

2022 has seen continued coverage across our supply chain of tracking and monitoring KPI's relating to modern slavery mitigation.

Key Performance Indicators	2022
Proportion of suppliers assessed using our risk management framework covering adherence to our supplier charter	New & Reactivated Suppliers 99%
Overall number of high-risk suppliers as per Global Slavery Index	571
Number of material breaches	None identified

Board approvals

This statement is made pursuant to section 54(1) of the Act. Capita's Chief Executive Officer approved this statement on behalf of the Capita Executive Committee on 26 June 2023. The Board ESG Committee approved this statement on behalf of the Capita plc Board on 26 June 2023.



Jon Lewis
Chief Executive Officer
June 2023



 **Capita**