1. Introduction

The purpose of this document is to outline the actions taken by the company (SSCL) to prevent slavery and human trafficking in its business and its supply chains. SSCL recognizes that it has a responsibility to take a robust approach in preventing slavery and human trafficking.

SSCL is committed to preventing slavery and human trafficking in its corporate activities, and is ensuring that its supply chains are free from slavery and human trafficking.

2. Organisational structure and supply chains

SSCL, in partnership with the Cabinet Office and Sopra Steria UK, has made significant strides in reducing slavery and human trafficking. The company has achieved savings of over £155 million.

SSCL has transformed the way they deliver services, providing better value for employees and clients.

Sopra Steria is a European leader in digital transformation, providing one of the most comprehensive portfolios of end-to-end services. The company has been identified by the UK’s National Action Plan on Slavery and Human Trafficking as a leader in the fight against modern slavery.

SSCL’s Supply Chain Code of Conduct is a public statement that all suppliers must adhere to, ensuring that slavery and human trafficking are not present in any part of the supply chain.

3. SSCL’s approach to preventing slavery and human trafficking

3.1 Relevant policies

- The following policies define the steps SSCL has taken to prevent slavery and human trafficking in its supply chains:

  a. Code of Ethics – applicable to all SSCL and Sopra Steria employees in India, the Code of Ethics describes the company’s commitment to the 10 principles of the UN Global Compact, including fighting against child labour and exploitation, forced labour or any form of compulsory labour.

  b. Business Integrity Policy – it is important to note that, without a strong commitment to ethical standards, the company’s integrity is at risk. The policy ensures that the company adheres to high standards in the procurement of goods and services.

  c. Policy for Recruitment/Agency workers – SSCL uses only reputable employment agencies to recruit workers and always verifies the practices of any agency before accepting any new agency. The recruitment process ensures that there is no slavery and human trafficking in the supply chain.

Three companies, Sopra Steria Group, are suppliers to SSCL, as well as to other companies. These companies include Sopra Steria France, which provides IT infrastructure and support services, as well as Sopra Steria Recruitment and Sopra Steria Infotech, which provides IT and business process services.
3.2 Processes and practices

3.2.1 Within our own operations

Adherence to relevant employment legislation promotes human rights and largely prevents modern slavery. SCS has a responsibility to ensure that workers are not being exploited, that they are safe at work and are not subject to a work environment that compromises their health and safety and human rights laws are adhered to.

A suspected case of modern slavery in our supply chain is investigated by the Business Integrity Policy.

Due Diligence: SCS takes the following steps to ensure there is no slavery in human trafficking within its own operations:

- All employees have a contract of employment that sets out their rights and obligations, ruling them out of their employment, including the notice period needed to return to the contract. The Company will pay their employment and will pay notice to return to the contract.

- The Company has a list of all employees at least the minimum wage found in their industry. This is to avoid exploitation and any employee's salary is paid in accordance with the local wage.

3.2.2 With our suppliers

SCS acknowledges that our supply chain contributes the greatest risk for slavery and human trafficking and as such, the relationship with the supply base is a critical part of our commitment to eliminating modern slavery. SCS annually procures around 40% of goods and services through its supply chain, of which 20% is with local suppliers in the UK, with companies within the European Union and North America.

Key categories of spend comprise:

- IT and Telecommunication Services
- Catering and Conference Services
- Travel and General Service, Including Hotels and Airlines

SCS undertakes robust due diligence when taking on all new suppliers, and regularly reviews its existing supply chain.

The company uses a Sustainability Risk Matrix, which covers more than a dozen key sustainability risk areas and better ranks them by supply category. Using the Sustainability Risk Matrix, we broadly map the supply chain to assess particular risks in geographic or risks of modern slavery and human trafficking. We identify suppliers in categories of supply with higher risks of slavery, and work with them to maintain suppliers. To maintain suppliers, we review the information on suppliers, which includes a review through assessment of their sustainability management processes, including those for the prevention of slavery and human trafficking.

We are continually making improvements to our ongoing monitoring and assessments of suppliers and work closely with key suppliers to share best practices and provide opportunities for improvement and implement new safeguards.

- Suppliers with higher overall sustainability risk scores must provide detailed information on their human rights policies and practices, both within their own organization and their supply chains.
- The supplier on boarding process incorporates a sustainability assessment of every new supplier where they have to provide evidence of sustainability policies and practices.
- During the last year, we have implemented a programme to ensure that all suppliers must confirm their acceptance of our Supplier Code of Conduct, which prohibits slavery and human trafficking, and requires them to take proactive steps to ensure that slavery and human trafficking do not occur in their operations or supply chains.
- We assist suppliers in helping to improve their practices, including providing advice and guidance on best practices or working with them to implement new policies to improve them.
- SCS has a policy of working in partnership, including the termination of business relationships or contracts - against suppliers that fail to improve their performance while maintaining our values and standards to our degree.
4. Performance indicators

SSCI has established the following key performance indicators (KPIs) in response to the introduction of the Modern Slavery Act 2015. These indicators effectively establish the actions the Company plans to carry out according to the timelines below. The indicators and activities are reviewed at least annually.

- Incorporating into our standard purchasing terms and conditions the requirement for suppliers to work to prevent slavery and human trafficking.
- Maintaining our pre-supplement risk matrix and assessment process that includes slavery and human trafficking; in order to assess the risk areas of our supply base and ensure ongoing, expanding that to cover a greater number of suppliers.
- Integrating the topic of slavery and human trafficking into our supplier engagement processes for sustainability.

5. Responsibility

Responsibility for SSCI initiatives addressing slavery and human trafficking as follows.

5.1 Policies:

Responsibility for policies is:

- Human Resources - Director of Human Resources - SSCI, for policies relating to the prevention of slavery and human trafficking in our own operations.
- Chairman Sopra Steria Group SA (France), for the Sopra Steria Group Code of Ethics.
- Procurement - Chief Procurement Officer, Sopra Steria Limited, for policies relating to the prevention of slavery and human trafficking in our supply chain as used for the key suppliers risk matrix.

5.2 Risk assessments

Our Sustainable Procurement Lead conduct risk assessments as part of our Sustainable Supply Chain Management programme.

5.3 Due diligence

In our own operations, the Human Resources team are responsible for ensuring that the Company adheres to all employment laws in the due diligence checks undertaken during different stages of employment, from initial recruitment onward.

In our procurement and supply chain management activities, the Company’s Procurement management team are responsible for undertaking due diligence activities, and for such actions related to slavery and human trafficking, they take input from other parts of the business, including Legal, HR and Sustainability.