

CIVICA

Modern Slavery and Human Trafficking Statement

Civica Group

2018 - 2022

Introduction

This statement sets out Civica's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Civica Group Limited, including its associated and subsidiary companies, recognises that it has a responsibility under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking and we are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

We are a global leader in software for public services, providing the cloud software and digital solutions used by more than two million professionals. Headquartered in London, we have facilities based around the UK. We also have operations and offices in Ireland, Australia, New Zealand, Singapore, India, Canada and the USA. Our supply chains are predominantly based within the countries in which we operate. Our parent organisation is Civica Group Ltd

Due the nature of our services, our business operations are predominantly in the Software Development and Technical arena, in addition to professional services including project management, customer support, service delivery and implementation.

We provide services to a range of public and public sector organisations, such as local and national government, NHS and private hospitals, emergency services and libraries.

Civica has a complex supply chain due to the variety of solutions and product sets offered to our customers. This supply chain can be split between four key areas: Property, Indirects, ICT services and ICT Hardware. Civica focuses primarily on key market leaders such as Microsoft Azure, Amazon Web Services, HP and Cisco, where downstream supply chains are adequately vetted and reported upon. We complete annual Modern Slavery audits as part of our supplier base 'ongoing assurance' due diligence, complementing our initial supplier 'on-boarding' process, to ensure the supply chain is compliant with risks such as product, location, country of origin and evidence of adequate modern slavery policy.

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **HR Policy** - We promote our Modern Slavery Policy within our Team Handbook which is available to all colleagues and is provided upon commencement of employment. We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally, and are paid at least the Real and London Living Wage, which is over and above the Legal National Minimum Wage. Our employees won't be forced to work in excess of the number of hours permitted in law, and normal working hours won't exceed 48 hours per week average unless the employee agrees.

- **Purchasing Policy** – The organisation is committed to conducting all Purchasing activities in a fair, objective and transparent manner that satisfy the requirements of both external and internal accountability, governance and controls. We have a comprehensive set of corporate policies and statements that provide direction and guidance to support fulfilment of our legal, financial, and Environmental, Social and Governance (ESG) obligations. Emphasis is placed on selecting suppliers, service providers, partners and contractors that ensure compliance with laws, legislation and regulations. That demonstrate high standards in terms of Environmental Social and Governance (ESG), sustainability credentials, Corporate Social Responsibility (CSR), business integrity and ethical business behaviour. Furthermore, that display high standards for health & Safety, human rights, labour working conditions, equal opportunities, Diversity and Inclusivity (D&I) and that maintain high levels of information security.
- **Recruitment Policy** - The organisation uses only specified, reputable employment agencies to source agency workers and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Whistleblowing Policy** - We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Civica. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- **Our values** - Civica's values of Knowledge, Integrity and Action makes clear to our employees the actions and behaviour expected of them when representing Civica. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Due diligence

We undertake due diligence in relation to slavery and human trafficking when considering taking on new suppliers, and review our existing suppliers on a periodic basis. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified
- When a supplier is deemed to be higher risk by country of origin and/or lack of suitable policy/processes, an investigation is raised and assessed by senior members of the purchasing team which can result in the vendor being inactivated.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Action taken to address Modern Slavery

Due to the nature of the supply chain, Modern Slavery risks are inherently higher in the hardware and peripheral item category, as the production process relies on factory labour.

Additional steps to manage the risk include sourcing goods from recognisable brands and reputable resellers, with evidenced processes and policies in place along with products/ suppliers that are

assessed based on the country of origin. Countries and regions are assessed for risk based on the Global Slavery Index, taking into consideration the latest updates from The Department for International Trade.

Awareness-raising programme

The organisation has raised awareness of modern slavery issues by circulating information to employees.

The information explained to relevant employees:

- The principles of the Modern Slavery Act 2015 and how it applies to Civica;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

We are currently improving our colleague mandatory training and planning to strengthen knowledge through these activities.

March 2022 update

Across the Civica Group, we continue to ensure that the working conditions for all our employees exceed statutory requirements in all the markets we operate in, and we conduct regular reviews against market standards. With over 5,700 employees across the globe, we continue to be an employer of choice across all our regions.

We're proud to be an Investors in People Gold business, alongside recognition as an Employer of Choice in the Australian Business Awards and named a Great Place to Work India in 2021. We are working towards the Disability Confident accreditation through our membership of the Business Disability Forum. We continue to be a signatory to the Armed Forces Covenant, as well as partnering with leading associations including techUK, the Tech Talent Charter and White Ribbon in Australia. We continue to apply these high standards across the Group, and in 2022 we are seeking to improve and build on our standing as an Employer of Choice.

In 2021, we continued to adapt our employee programmes and training to meet the needs of blended working; with a successful mix of virtual and face-to-face training as people began returning to our hubs. We ran a range of engagement initiatives and maintained an excellent employee Net Promoter Score of +50, up 18 points on the previous year. We continue to support our people via our global network of Mental Health Champions, accredited through Mental Health England.

“As a leading global business, Civica recognises that modern slavery and human trafficking are significant global issues that present challenges for businesses around the world. In line with our values of Knowledge, Integrity and Action, we are committed to continually improving our practices to combat modern slavery and human trafficking within our supply chains. We have a zero-tolerance approach to these issues and act with integrity in all our business arrangements.”

Wayne Story, CEO

We also continue to review our Group policies and practices around diversity and inclusivity (D&I) and were listed as a Financial Times Diversity leader in 2022 for the third year running. We have taken further steps to improve D&I through launching a series of affinity groups, ranging from women's and race and ethnicity groups to LGBTQIA+ and early career starters. We include D&I modules on all leadership programmes and held roundtable sessions on the menopause and to celebrate Black History Month and International Women's Day.

We recognise that work is crucial to a person's dignity, well-being and development and we are committed to the creation of jobs and working conditions in which people can work in freedom, safety and dignity at a global level. We expect the same from all contractors, suppliers and other business partners across our global supply chain. We are committed to identifying and assessing any potential risks and eliminating the possibility of modern slavery and human trafficking occurring in our business.

We have improved our whistleblowing policy, ensuring that there is an anonymous process for employees, customers and other business partners to report their concerns related to the direct activities, or the supply chains of Civica. Our whistleblowing procedure continues to be designed to make it easy for employees to make disclosures without fear of retaliation.

Due to the nature of the business, we have not identified any high-risk Modern Slavery concerns in 2021.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Civica's slavery and human trafficking statement for the financial year ended 30.09.2021.

Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually. Our Executive Management Team take responsibility for implementing this statement and its objectives. They will ensure adequate resources and investment to ensure slavery and human trafficking isn't taking place within our organisation or within our supply chains.

Director's signature:



Director's name: Wayne Story

Director's position: CEO

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