

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT for the financial year ending 30<sup>th</sup> September 2024 (FY24)

#### Overview

Sabio Ltd and its group of companies ("**Sabio**") takes combatting slavery and human trafficking seriously. It continues to be a priority for Sabio to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

#### Who we are

Sabio is a contact centre technology and customer experience specialist. We provide solutions which include technology developed by Sabio as well as by established and reputable, global vendors in conjunction with Sabio's business consulting, systems integration, training, professional and managed services.

Sabio has approximately 700 employees worldwide and has offices in the UK, Spain, The Netherlands, Malaysia, Singapore and South Africa, and has a global annual turnover of approximately £127m.

#### Our supply chain

Our supply chain includes:

- manufacturers and resellers of hardware and software;
- IT and telecommunications service providers; and
- suppliers of other goods and services to Sabio for our own use.

## Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

We have an Anti-Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. It is available to all employees. The policy ensures that our employees understand their responsibility for prevention, detection and reporting of slavery and human trafficking within our own business and within our supply chain.

We require our staff to comply with this policy and to promote our zero-tolerance approach to slavery and human trafficking to suppliers.



We also have the following policies in place relevant to preserving human dignity and preventing modern slavery:

- Sabio Code of Conduct;
- Public Interest Disclosure (Whistle Blowing) Policy;
- Equality, Diversity and Inclusion Policy;
- Dignity at Work Policy.

## Due diligence

In order to identify and mitigate risk we:

- monitor information about suppliers in the public domain;
- seek to oblige suppliers to comply with all applicable laws (which would include the Modern Slavery Act 2015); and
- endeavour to include specific anti-slavery clauses in contracts with strategic suppliers.

## Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we require suppliers to complete onboarding due diligence questionnaires regarding their practices and confirming willingness to comply with our own policies and procedures.

We also have a dedicated ESG steering committee which consists of representatives and involvement from the following departments:

- People;
- Engagement and Social Value;
- Finance;
- Legal;
- Information Security;
- · Commercial and Customer Experience; and

This committee works to improve Sabio's ESG and compliance practices, which includes keeping the effectiveness of our anti-slavery measures under review. Employees are welcome to contribute to those steering committee meetings, too.

During FY24 Sabio strengthened its due diligence processes, applicable group-wide, to gather more information relating to our suppliers, in particular any which we consider to operate in areas giving rise to the highest risks (including the risk of modern slavery).



# **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff.

# Effectiveness of anti-slavery measures

The effectiveness of our anti-slavery measures is kept under review. We are committed to reviewing the measures taken each year and to implementing any necessary improvements identified.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sabio's slavery and human trafficking statement for the financial year ending 30 September 2024.

This statement has been approved by the Board of Directors of Sabio Ltd.

A copy of this statement signed by our Chief Financial Officer is available upon request.