

1. FAOVERVIEW

The Sigma Connected Group of companies is part of the Digicall Group and comprises:

Sigma Connected Holdings Limited (“SCHL”) which is authorised and regulated by the Financial Conduct Authority (FCA).

Sigma Connected Limited, a wholly owned subsidiary and Appointed Representative of SCHL.

Sigma Connected (Pty) Limited, Cape Town (South Africa), a wholly owned subsidiary of Digicall and an Appointed Representative of SCHL.

Sigma Connected SA (Pty) Limited, Cape Town (South Africa), a wholly owned subsidiary of Digicall.

Sigma Connected Proprietary Limited, Brisbane (Australia), a wholly owned subsidiary of SCHL.

McLaren Credit Services and **ReachOut** are both trading styles of Sigma Connected Limited.

Appointed Representatives can carry out regulated activities on behalf of SCHL.

Sigma Connected Holdings Limited, as Principal, take full responsibility for ensuring compliance with the FCA’s handbook of rules and guidance.

Sigma provide outsourced debt collection and white label business processing services to a range of companies across multiple sectors. As such, those activities are subject to the rules of various regulators in multiple jurisdictions.

These regulators define standards and expectations for corporate conduct. This policy aims to define a regulator and jurisdiction agnostic, best of breed standard across sectors, regulators and the corporate group as a whole.

2. SCOPE OF THE POLICY

This Statement describes the framework used by the Sigma Connected Group to detect, prevent and mitigate the risk of modern slavery in our business and supply chain.

This Statement covers the period during the financial year ended April 2022 and will expire at the end of April 2023. This policy ensures adherence to the regulatory standards found in:

- Section 54 of the Modern Slavery Act 2015

This statement also takes into consideration the Australian Modern Slavery Act 2018 and, whilst Sigma Connected Proprietary Limited does not meet the threshold of a ‘reporting entity’, we choose to make this statement voluntarily. This voluntary statement is not reported to the register and at the time of this statement, we are not voluntarily reporting to the government under part 1, section 6 of the Act.

This policy ensures adherence to the regulatory standards found in:

- The Modern Slavery Act 2015 (Section 54)
- The Modern Slavery Act 2018 (Cth) (Commonwealth Act) – Australia
- Article 13 of the Constitution – South Africa

3. OUR COMMITMENT

Sigma Connected place the highest importance on people and community and the welfare of all those our business impacts. We do not tolerate oppression, slavery or human trafficking within our business or supply chain.

We commit to conduct our business in an ethical and responsible manner, ensuring our business relationships do not cause, use or hide slavery and human trafficking anywhere in our business operations or supply chain.

We also require our Clients and business partners to take the necessary steps and evidence how they prevent, avoid and tackle the risk of slavery and human trafficking.

4. PROCESS & STANDARDS

The Sigma Connected Group is structured as described in section 1 of this statement.

We operate a 'Three Lines of Defence' model across Compliance and Risk and where risks relating to exploitation are captured within our risk management programme.

We operate a full compliance committee programme including Risk, Audit, Conduct Risk, Bribery & Corruption and general Governance matters, all of which report directly through to the Executive Committee and Chief Executive Officer. All matters which sit outside of tolerance are notified to the full Exec via this structure and via the incident process for acute issues and the Executive Team carry full responsibility for the conduct of the organisation.

5. POLICIES RELATING TO MODERN SLAVERY

Sigma have a set of core values which are closely aligned to the value we place in people and community. These values ensure we operate our business with principles that are rooted in ethical, transparent conduct. In addition, Sigma Connected's governance framework relies heavily on a robust policy suite, reviewed annually and with accountability and ownership sitting within the Executive layer. Policies relevant to modern slavery are listed below:

5.1 WHISTLEBLOWING POLICY

We operate an independent, anonymous Ethics and Fraud reporting service to support our whistleblowing policy and process. This is compliant with UK law, the EU Whistleblower Directive and the relevant laws within all jurisdictions in which we trade.

5.2 CONDUCT RISK AND TREATING CUSTOMERS FAIRLY

Our conduct Risk Framework ensures we are identifying, monitoring and measuring conduct and conflicts of interest within our organisation and this activity is supported by a dedicated annual committee.

5.3 DIGNITY AT WORK

This policy ensures we clearly define our stance around anti-bullying and harassment, diversity and equality, compassionate leave, disciplinary processes, and religious holidays.

5.4 FINANCIAL CRIME & CONFLICTS OF INTEREST

These policies ensure we manage the risk of Fraud, Money Laundering, Bribery and Corruption within our businesses.

5.5 HEALTH & SAFETY

We have an extensive health and safety policy suite which ensures minimum standards of care for all employees, preventing breaches of the work time directive and ensuring a safe and positive environment for all employees, clients, visitors and contractors.

5.6 SOURCING & SUPPLIER RISK

We have policy and processes in place to ensure we purchase goods and services from reputable, ethical businesses and we monitor them annually to ensure they continue to meet the standards and expectations laid out within this policy.

6. TRAINING & AWARENESS

We raise awareness of conduct, human rights and diversity and inclusion amongst our colleagues through mandatory training at induction, by using an online platform during employment and through internal communications and

engagement activity. Completion rates for all mandatory training are monitored and business leaders are informed where these rates are not satisfactory.

We also ensure all staff, clients and contractors are aware of our whistleblowing policy, and are advised how to report concerns. We encourage colleagues to report all potential or actual incidents that relate to wrongdoing or actual or suspected illegal or serious inappropriate activity, whether related to modern slavery or not.

7. RISK ASSESSMENT

All staff are subject to background checks and we demand evidence of these checks having been performed where we outsource recruitment through employment agencies, we also audit any agencies regularly to ensure standards are met. We ensure that all colleagues are legally permitted to work within the UK and that they are joining us of their own free will and are not coerced to join us. Financial checks are undertaken on all employees.

We include appropriate measures in our due diligence processes to engage clients and suppliers on a risk assessed basis. Compliance with human rights, fair treatment and reasonable remuneration for colleagues as well as safe working conditions are all reviewed, we are a minimum wage employer and aspire to be living wage employer.

8. EXCEPTIONS

There are no exceptions to this policy.

9. RESPONSIBILITIES

- It is the responsibility of the **Board** to ensure the Policy is effective & reviewed as required.
- The **Director of Compliance, Risk and Audit** is the Policy owner, responsible for ensuring the policy is enforced throughout the business and that it is reviewed Annually.
- All **employees** have a responsibility to help detect and prevent exploitation.
- The **Governance Team** is responsible for ensuring all staff are aware of this policy.
- The **Chief Executive Officer** is the Executive Owner for this policy.

10. DOCUMENT CONTROL

Policy Owner: Peter Hopgood-Gravett, Director of Compliance, Risk and Audit

Policy Approver: Gary Gilburd, CEO

10.1 CHANGE LOG

Date	Author	Summary of Changes	Version
April 2022	PHG	Approved 2022 Statement	2
November 2022	PHG	Addition of Australia	2.1
December 2022	PHG	Re-Brand and Addition of SA Legislation	2.2