

MODERN SLAVERY STATEMENT, 2026/27 - Employee Overview

Well, hello there! Looks like you're interested in our **Modern Slavery Statement** - awesome! Here you'll learn all about how the framework is used by the Sigma Connected Group to detect, prevent, and mitigate the risk of modern slavery in our business and supply chain. We've also got some legal stuff to cover in the small print section, which is included in all our policies.

1. 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 2026 and will expire at the end of April 2027. This policy ensures adherence to the regulatory standards found in:

- Section 54 of the Modern Slavery Act 2015
- Article 13 of the Constitution – South Africa

2. 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.

3. PROCESS & STANDARDS

The Sigma Connected Group is structured as described in section 7 of this statement and 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 organization.

4. EFFECTIVENESS & MONITORING

Effectiveness of modern slavery controls is monitored through a combination of policy compliance, mandatory training completion, whistleblowing utilisation, and governance oversight. These indicators are reviewed annually to assess whether controls remain appropriate and operating as intended.

Were a potential modern slavery concern to be identified, Sigma Connected would prioritise the safety and welfare of affected individuals. This would include engagement with relevant internal governance forums and, where appropriate, external authorities or specialist organisations, with actions taken proportionately and responsibly.

Sigma Connected recognises that addressing modern slavery risk is an ongoing process. Over the next reporting period, we intend to further enhance supplier risk visibility, governance reporting, and internal awareness to strengthen our framework year on year.

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 ensure we manage the risk of Fraud, Money Laundering, Bribery and Corruption in 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

Sigma Connected undertakes proportionate due diligence on suppliers commensurate with risk. This includes pre-engagement checks, consideration of labour practices, contractual modern slavery clauses where appropriate, and ongoing review of supplier relationships. Where suppliers are identified as higher risk, enhanced engagement or assurance activity may be undertaken.

6. RISK ASSESSMENT

Sigma Connected recognises that modern slavery risks vary by geography, labour model and supplier type. Based on a high-level annual risk assessment, we consider elevated inherent risk factors to include labour-intensive outsourced services, use of temporary or agency labour, and operations in jurisdictions with higher prevalence of labour rights violations. While no confirmed instances of modern slavery were identified during the reporting period, Sigma acknowledges that the absence of identified cases does not equate to the absence of risk, and we continue to evolve our approach to identifying and prioritising these risks.

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 country we employ them 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.

7. THE SMALL PRINT

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.

ReachOut is a trading style 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.

8. TRAINING

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.

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

This Policy will be reviewed by the Director of Compliance, Risk and Audit as required, but at least annually or more frequently if changes are required.

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
March 2023	PHG	2023 Review – minor amends.	2.3
April 2024	PHG	Annual Review and Approval	2.4
April 2025	PHG	Annual Review and Approval	2.5
April 2026	PHG	Annual Review and Approval, addition of improvements around risk, supply chain, effectiveness, and continuous improvement. Removal of Australia.	2.6