

**SYKES AUSTRALIA PTY LIMITED and SYKES FINANCIAL SERVICES PTY LIMITED  
MODERN SLAVERY STATEMENT**

**Introduction**

Section 13 of the Modern Slavery Act of 2018 (Commonwealth of Australia) (the “Act”) requires reporting entities to give the Minister for Home Affairs each financial year to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls and describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks.

Modern slavery includes slavery, servitude, forced labour, deceptive recruiting for labour or services, forced marriage, debt bondage, trafficking in persons, especially women and children, and the worst forms of child labour.

This statement applies to SYKES for the financial year ending 31 December 2020 and will be reviewed and updated annually.

**Our Business and Supply Chains**

Sykes Australia Pty Limited and Sykes Financial Services Pty Limited are affiliated companies of Sykes Enterprises, Inc., (SYKES) is a global leader in providing customer contact management solutions and services in the business process outsourcing (BPO) arena. SYKES provides an array of sophisticated customer contact management solutions to Fortune 1000 companies around the world, primarily in the communications, financial services, healthcare, technology and transportation and leisure industries. SYKES specializes in providing flexible, high quality customer support outsourcing solutions with an emphasis on inbound technical support and customer service.

Headquartered in Tampa, Florida, with customer contact management centers throughout the world, SEI provides its services through multiple communication channels encompassing phone, e-mail, web and chat. Utilizing its integrated onshore/offshore global delivery model, SYKES serves its clients through two geographic operating segments: the Americas (United States, Canada, Latin America and Asia Pacific) and EMEA (Europe, Middle East and Africa). SYKES also provides various enterprise support services in the Americas and fulfillment services in EMEA, which include multi-lingual sales order processing, payment processing, inventory control, product delivery and product returns handling.

**Our Proactive Actions**

SYKES takes a zero-tolerance approach to modern slavery.

We undertake supplier risk assessments and due diligence on proposed service providers.

We are committed to fair employment practices to ensure that workers are not exploited, that they are safe and that relevant employment standards (including pay and working time) and health and safety laws are adhered to. We also support the global commitment to eliminating forced or compulsory labor and to effectively abolishing child labor.

### **Our Supply Chain**

Our supply chain supports our operational requirements. Our business is labor-intensive and therefore wages, employee benefits and employment taxes constitute the largest component of our operating expenses. In addition to capital expenditures for facility expansion and upgrades and maintenance and system infrastructure, other major purchasing includes facilities operations, hardware, data management and warehousing, telephone and data services, software maintenance, consulting, travel, and merger and integration expenses.

SYKES is committed to working closely with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

### **Overall Responsibility**

The Board of Directors of SYKES has overall responsibility for formulating our slavery and human trafficking compliance strategy, for ensuring that strategy is complied with, and for preparing an annual statement. The Directors are responsible for:

- ✓ overseeing the assessment of slavery and human trafficking risks within SYKES and its supply chains;
- ✓ answering questions about SYKES' approach to anti-slavery and human trafficking;
- ✓ overseeing the review of our supplier due diligence procedures to support compliance;
- ✓ facilitating appropriate corrective action if any slavery and human trafficking issues are identified; and
- ✓ monitoring the effectiveness of our approach.

All levels of management within SYKES are responsible for ensuring that those who report to them understand and comply with our anti-slavery policy and our zero-tolerance approach to slavery and human trafficking. The responsibility extends to ensuring that steps are taken to report and investigate any slavery and human trafficking issues which are identified.

Everyone to whom the SYKES anti-slavery policy applies (including, for the avoidance of doubt, our suppliers) is responsible for preventing, detecting and reporting instances of slavery and human trafficking in any part of our business or in our supply chains.

### **Our Human Rights Commitments**

Operating within clear guidelines for ethical and respectful conduct is important to SYKES, our clients and our employees. As a people-intensive business, SYKES' employees are held to the highest standards of ethical behavior and integrity, with an expectation that they will comply with the company's Standards of Business Conduct. Depending on their position in the company, 2-4 times each year employees receive Standards of Conduct awareness communications and certification. These communications will

incorporate specific language relative to the identification and prevention of slavery and human trafficking. To help employees navigate through everyday business situations, managers encourage employees to have regular conversations about the Standards.

Internally, if any SYKES employee identifies any issues of concern, he or she must notify their regional human resources representative or our reporting hotline immediately. This extends to any suspicion any employee may have that slavery or human trafficking exists in any part of our business or supply chains. We will support anyone who raises genuine concerns in good faith under the SYKES anti-slavery policy, even in circumstances where it transpires that those concerns are mistaken. We will take steps to ensure that those who report such concerns do not suffer adverse treatment. Adverse treatment includes, bullying, harassment, threats, disciplinary action or dismissal connected with raising a genuine concern in good faith. If an employee who believes that he or she has suffered any adverse treatment after raising such a concern, the employee should raise the matter formally under the SYKES grievance procedures.

### **Our Due Diligence and Risk Mitigation**

To mitigate the risks of human trafficking and modern slavery, SYKES has both internal, employee-focused human resources policies, as well as external, supplier-focused statements and a code of conduct.

SYKES has a number of human resource and supply chain policies in place. We confirm the identities of all employees and confirm that they are of minimum legal employment age. We ensure all policies and procedures are applicable to our home-based employee work force.

We conduct the appropriate background due diligence investigations on our suppliers. As an organization with operations in multiple countries worldwide, we organizationally stand behind the prevention of modern day slavery and human trafficking across our global operations.

All supplier contracts undergo a formal review process, which includes procurement, departmental and legal review and sign-off to ensure that our suppliers meet our rigorous standards with respect to the prevention of human trafficking and modern slavery.

Our statement for the “Prevention of Involuntary Labor and Human Trafficking” prohibits our suppliers and their affiliates, subsidiaries, subcontractors and third-party labor providers or recruiters from using labor below minimum legal employment age, or trafficking persons or using any form of slave, forced, bonded, indentured, or prison labor. Our suppliers shall not withhold workers’ original government-issued identification and travel documents. We define “involuntary labor” to include the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

### **Employee Awareness and Training**

SYKES employees are required to annually review and participate in a number of ethics and awareness communications and training programs. While none of these programs currently specifically address human trafficking, we are researching an appropriate training and/or awareness platform to educate employees about human trafficking and how to respond.

### Monitoring Effectiveness

SYKES management expects high standards of both employees and our suppliers. We actively consider opportunities to further extend our due diligence and auditing processes to prevent modern day slavery and human trafficking in our supply chains and across our business.

In particular:

- SYKES' employees were held to the highest standards of ethical behavior and integrity, with an ongoing expectation that they will comply with the company's Standards of Business Conduct.
- SYKES continues to expect our suppliers, both domestic and foreign, to abide by our Supplier Code of Conduct, which outlines our expectations for suppliers' ethics and standards of conduct, business integrity, human rights, and labor practices.
- SYKES routinely evaluates our internal policies, Standards of Conduct, and staff training to ensure continued and timely compliance to prevent slavery and human trafficking.

As we have outlined in this statement, SYKES will continue to advance our efforts to prevent slavery and human trafficking in our supply chains.

This statement was approved by the full Board of Directors of SYKES and signed by James Holder, Director on 17 April 2020.

Signed,

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*James T. Holder*  
James T. Holder  
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Chair  
April 22, 2020