

# CCI GLOBAL

## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

DECEMBER, 2025

*"Until the lions have their own historians, the history of the hunt will always glorify the hunter."* - Chinua Acheb (Nigerian Novelist & Poet)

# PROLOGUE

At CCI Global, we operate at the intersection of global business, human dignity, and Africa's future workforce. As a business built in Africa and serving the world, we recognize both the responsibility and the privilege that comes with our position. Ensuring that modern slavery has no place in our operations or value chain is not simply a regulatory obligation, it is a non-negotiable ethical principle. From the outset, we have deliberately designed our recruitment, employment, and governance frameworks to prevent exploitation before it can occur. This includes direct hiring, transparent employment contracts, fair wages, and robust oversight mechanisms that place the safety and agency of our people at the center of everything we do.

We understand the local realities that can create vulnerability to exploitation such as intergenerational unemployment, community debt pressures, and the absence of formal employment pathways. Rather than viewing these realities as risks to be avoided, we see them as challenges to be addressed head-on. Our Impact Sourcing model transforms access to decent work into a powerful safeguard against coercion, bonded labor, and unsafe migration. Formal employment is not only a job, but it is protection, stability, and choice. We have therefore invested in processes, governance structures, and culturally informed safeguards that reflect both international best practice and on-the-ground African context. Our approach goes beyond policy documents; it is embedded in how we hire, how we train, how we listen, and how we respond. We actively equip our leaders and employees to recognize early warning signs of exploitation and to speak up without fear, supported by confidential and accessible reporting mechanisms.

As a leading African BPO provider, we believe we have a role to play in reshaping global perceptions of the continent. Africa is not a source of risk it is a source of talent, resilience, and ethical leadership. By setting high standards and holding ourselves accountable, CCI Global is proud to be at the forefront of building a future where global outsourcing from Africa is synonymous with integrity, transparency, and positive social impact. This statement reflects our ongoing commitment to continuous improvement, accountability, and leadership. We will continue to evolve our approach, strengthen our controls, and use our platform to contribute to a more just and inclusive global economy starting with the people who make our business possible.

## OUR COMMITMENT

This Modern Slavery and Human Trafficking Statement is published pursuant to the **UK Modern Slavery Act 2015**, the **Australian Modern Slavery Act 2018**, and aligned with the principles of the **California Transparency in Supply Chains Act**.

CCI Global (“CCI”, “we”, “our”) is committed to conducting business ethically, responsibly, and with respect for internationally recognized human rights. We take a **zero-tolerance approach** to modern slavery, forced labor, bonded labor, child labor, and human trafficking in all forms.

Beyond compliance, we view our role as an **active contributor to social and economic inclusion** in Africa. Our business model is intentionally designed to reduce vulnerability to exploitation by creating **safe, formal, and dignified employment** in regions where unemployment and informal labor markets heighten modern slavery risks.



## OUR BUSINESS

CCI is a global **Business Process Outsourcing (BPO)** provider delivering customer experience (CX), technical support, and outsourced technical services to clients across the **United States, United Kingdom, Europe and Australia.**

Our primary delivery operations are located in:

- ❖ **South Africa**
- ❖ **Kenya**
- ❖ **Rwanda**
- ❖ **Ethiopia**
- ❖ **Ghana**
- ❖ **Egypt**
- ❖ **Botswana**

We employ a predominantly office-based workforce, with all frontline and support employees:

- **Recruited directly and internally**
- **Employed under formal, lawful contracts**
- **Paid in accordance with or above applicable local labor standards**

We do **not** use labor brokers, recruitment agents, or third-party staffing firms for frontline hiring.

## THE AFRICAN ADVANTAGE

CCI's operating model is rooted in **Impact Sourcing**, the intentional recruitment of individuals from **economically disadvantaged and high-unemployment communities**. In many African contexts, lack of access to formal employment significantly increases vulnerability to:

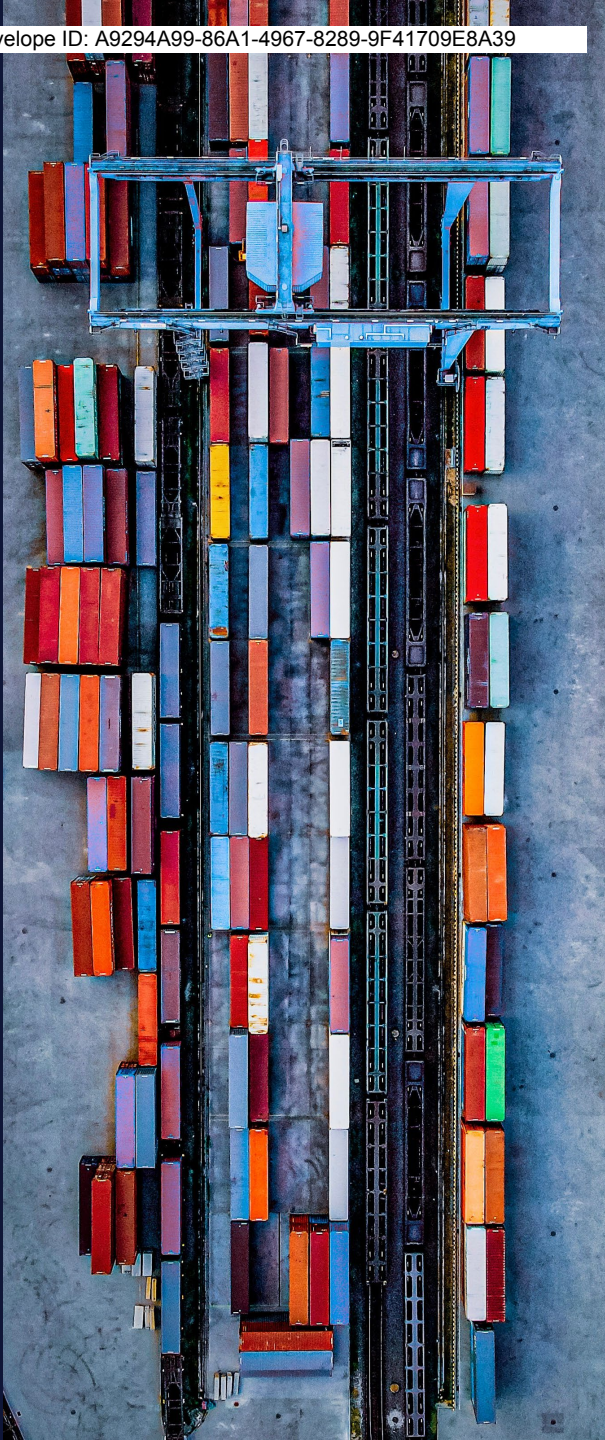
- **Exploitative informal labor**
- **Debt-driven coercion**
- **Unsafe migration and trafficking**

By providing **stable, formal employment**, we directly reduce these vulnerabilities.

### Our Safeguards in Practice

- ✓ **Our employment model acts as a protective barrier against modern slavery through:**
- ✓ **Formal employment contracts in plain language**
- ✓ **No recruitment or placement fees**
- ✓ **Guaranteed wage payments through regulated payroll systems**
- ✓ **Access to benefits, including statutory leave and social protections**
- ✓ **Career pathways, skills development, and internal mobility**
- ✓ **Employee retention of identity documents at all times**

We view decent work not only as a commercial imperative, but as a **structural prevention mechanism** against exploitation.



## OUR SUPPLY CHAINS

We distinguish clearly between two types of supply chains:

### Labor Supply Chain (Our People)

Our most significant “supply chain” is our own workforce. All employees are:

- Directly hired by CCI
- Employed under local labor law
- Free to enter and exit employment subject only to lawful notice periods

This direct employment model significantly lowers the risk of forced labor, debt bondage, or involuntary work.

### Procurement Supply Chain (Third-Party Vendors)

Our procurement supply chain includes:

- IT hardware and software providers
- Telecommunications and data infrastructure vendors
- Facilities management, cleaning, and security services
- Background screening and professional services
- Office equipment and consumables

We do not operate in manufacturing, agriculture, mining, or extractive industries. However, we recognize that **forced labor risks can exist upstream**, particularly in global technology supply chains.

# MODERN SLAVERY RISK ASSESSMENT

## OPERATIONAL RISK

We assess the inherent risk of modern slavery within our own operations as **low**, due to:

- ❖ Internal recruitment
- ❖ Direct employment
- ❖ Strong labour law frameworks in our operating countries
- ❖ High workforce visibility and oversight

## SUPPLY CHAIN RISK

While our supplier base is primarily composed of established service providers, we recognize elevated risk may exist where:

- ❖ Services are labor-intensive (e.g. cleaning, security)
- ❖ Workers may be lower-paid or more vulnerable
- ❖ Hardware may be sourced from complex international manufacturing chains

We conduct periodic modern slavery risk assessments considering:

- ❖ Geographic risk
- ❖ Sector risk
- ❖ Workforce vulnerability
- ❖ Use of subcontracting
- ❖ Transparency of upstream supply chains

## SUPPLY CHAIN DUE DILIGENCE

### Supplier Onboarding & Vetting

All material suppliers are subject to risk-based due diligence, including:

- ❖ Mandatory acceptance of our Supplier Code of Conduct
- ❖ ESG and labour standards questionnaires
- ❖ Enhanced scrutiny for higher-risk sectors or geographies

### Technology & Hardware Due Diligence

For technology and hardware vendors, we assess:

- ❖ Public modern slavery statements
- ❖ Alignment with international labour standards
- ❖ Supplier commitments to eliminating forced labour in manufacturing
- ❖ Traceability practices where available

Where concerns are identified, we engage suppliers to:

- ❖ Clarify controls
- ❖ Implement corrective actions
- ❖ Reassess the commercial relationship if remediation is not achieved



## SUPPLIER DUE DILIGENCE

CCI Global applies a risk-based approach to supplier onboarding and ongoing due diligence, designed to identify and address potential modern slavery risks before and during engagement. All material suppliers are required to formally accept and comply with our Supplier Code of Conduct, which sets clear expectations around ethical labor practices, human rights, and legal compliance. As part of our onboarding process, suppliers complete ESG and labor standards questionnaires, with enhanced scrutiny applied to those operating in higher-risk sectors or geographies.

Recognizing that forced labor risks can exist further upstream in global supply chains, we apply additional due diligence to technology and hardware vendors. This includes reviewing publicly available modern slavery statements, assessing alignment with international labor standards, and evaluating supplier commitments to eliminating forced labor in manufacturing. Where feasible, we also consider the transparency and traceability of supply chains.

Where potential concerns or gaps are identified, we engage directly with suppliers to understand existing controls and require corrective actions where appropriate. If remediation is not achieved, we reassess the commercial relationship to ensure alignment with our ethical standards and zero-tolerance approach to modern slavery.



## POLICIES & GOVERNANCE

Our approach is supported by a robust governance framework, including:

- ✓ Code of Conduct
- ✓ Human Capital & Recruitment Policies
- ✓ Supplier Code of Conduct
- ✓ ESG & Risk Management Framework
- ✓ Whistleblowing / Speak-Up Policy

Responsibility for modern slavery oversight sits with senior management and is reported through established governance structures to the Executive Committee and Board.



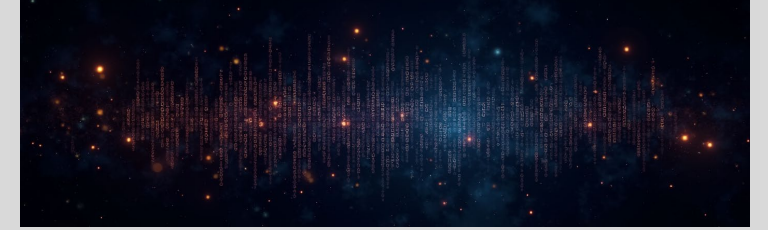
## WHISTLEBLOWING & GRIEVANCE

We recognize that in some communities, employees may face external pressures such as family debt, community obligations, or informal lenders factors that can increase vulnerability to coercion.

To address this, we provide:

- ✓ Anonymous and confidential reporting channels
- ✓ Multiple access points (digital, phone, in-person escalation)
- ✓ Non-retaliation guarantees
- ✓ Culturally sensitive handling of concerns

All reports are investigated promptly, with a focus on employee safety, dignity, and support, including referral to appropriate assistance where required.



## TRAINING & AWARENESS

We deliver targeted training to:

- ✓ Human Capital teams
- ✓ Procurement and vendor management teams
- ✓ Compliance and ESG stakeholders
- ✓ People leaders and site management
- ✓ Training covers:
  - ✓ Indicators of forced labor and coercion
  - ✓ Understanding bonded labor risks in local contexts
  - ✓ How to escalate concerns safely
- ✓ Supplier responsibility expectations

# MEASURING EFFECTIVENESS & KPIS

We measure the effectiveness of our modern slavery framework through a set of clearly defined indicators that allow us to monitor performance, identify gaps, and drive continuous improvement. These indicators include the proportion of relevant employees who receive annual training on modern slavery awareness, ensuring knowledge and vigilance across the organization.

We also track supplier engagement through ESG questionnaire completion rates, alongside the frequency and outcomes of supplier risk reviews and audits. In addition, we monitor the number of concerns reported and their timely resolution, using these insights to strengthen our controls and response mechanisms. Periodic reassessment of modern slavery risks further supports our ability to adapt to changing conditions and emerging risks, ensuring the framework remains effective and responsive over time.

# EPILOGUE

As we look ahead, CCI Global remains unequivocally committed to strengthening our role in preventing modern slavery within our business, across our supply chains, and throughout the communities in which we operate.

In the coming reporting periods, we will broaden modern slavery awareness and training across our workforce, deepen engagement with suppliers to improve upstream labor transparency, and enhance how we identify and monitor workforce vulnerability. These actions will ensure our safeguards remain effective, relevant, and grounded in local realities.

At the core of our future approach is our continued commitment to Impact Sourcing as a defining ethical pillar of CCI Global. By expanding access to formal employment, skills, and long-term careers, we actively reduce the conditions in which exploitation can occur.

We believe Africa's growth must be built on dignity, fairness, and opportunity. CCI Global will continue to lead by example, demonstrating that ethical leadership and commercial success are not only compatible, but inseparable.

**This statement has been approved by the Board of Directors /  
Executive Committee of CCI.**

**Signed:** \_\_\_\_\_

Signed by:   
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**Name: Martin Roe**

**Title: Global Chief Executive Officer**