

Modern Slavery Policy

1. Our Commitment

1.1 Modern slavery is a crime and a violation of fundamental human rights. Modern slavery takes on various forms, including slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

1.2 Genesys takes a zero-tolerance approach to modern slavery and is committed to acting ethically to implement and enforce effective systems and controls to ensure modern slavery is not taking place within Genesys or its supply chains.

1.3 Some examples of modern slavery are:

Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services is imposed by the use of coercion.
Forced or compulsory labour	Work or services are not undertaken voluntarily and are exacted from a person under the menace of threat or punishment.
Human trafficking	Arranging for facilitating the travel of another person with a view to their exploitation, including for example, through deceptive recruitment or coercion.
Bonded labour or debt bondage	Work or services are demanded for repayment of a debt, often where the debt and the duration of the services may not have been defined.
Child labour	All forms of slavery or practices affecting children, such as the sale and trafficking of children or compulsory labour.

1.4 The above range of rights abuses all have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.5 It is important to understand that there is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- They are not in possession of their own passport, identification or travel documents.
- They are acting as though they are being instructed or coached by someone else.

- They allow others to speak for them when spoken to directly.
 - They are dropped off and collected from work.
 - They are withdrawn or they appear frightened.
 - They do not seem to be able to contact friends or family freely.
 - They have limited social interaction or contact with people outside their immediate environment.
- 1.6 The list is not exhaustive. It is an example only. Remember, a person may display a number of the trafficking indicators but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it. Refer to the Compliance section below for further detail.
- 1.7 Genesys is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to reduce the risk of modern slavery taking place anywhere in our own business or in any of our supply chains.
- 1.8 Genesys has created this policy to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains. Genesys prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, child labour, modern forms of slavery and any form of human trafficking. This intolerance to modern slavery forms an integral part of our business culture. Further, we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Acts of various nations. For this reason, Genesys expects the same high standards from our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.9 This policy applies to all persons working for Genesys or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
- 1.10 This policy does not form part of an employee's contract of employment and Genesys may amend it at any time.



2. Responsibility for this Policy

- 2.1 The Genesys Board of Directors has overall responsibility for ensuring this policy complies with Genesys' legal and ethical obligations, and that all those who work for or are engaged by the Genesys group of companies comply with it.
- 2.2 The Chief Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 2.4 All those working for Genesys have responsibilities under this policy regardless of the level of seniority. You are also invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Chief Compliance Officer.

3. Compliance with this Policy

- 3.1 You must ensure that you read, understand, and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Genesys or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify your manager or the Legal Department at legal@genesys.com as soon as possible if you believe or suspect that a breach of or conflict with this policy has occurred or may occur in the future. Alternatively, you can raise your concern anonymously if requested, to the Compliance Helpline. The Compliance Helpline is available 24 hours a day, 7 days a week, and is accessible to employees at www.genesys.ethicspoint.com. Reports can also be made by telephone in the U.S. and Canada at +1 (855) 260-7436. Telephone numbers for other global locations are available at www.genesys.ethicspoint.com.
- 3.4 You are encouraged to raise any concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Legal Department as soon as possible. Genesys encourages openness and transparency and

will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Helpline.

- 3.5 You should note that where appropriate, and with the welfare and safety of workers as a priority, Genesys will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

4. Supplier Assessment

- 4.1 Before engaging suppliers (including subcontractors), Procurement will complete a risk assessment to assess the risk of modern slavery. This will include:
- Mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking.
 - Assessing the modern slavery and human trafficking risks of each new supplier.
 - Ensuring that the suppliers have policies in place to encourage the reporting of concerns and the protection of whistle blowers.
 - Engaging with our suppliers with the purpose of conveying the modern slavery and human trafficking policy and to facilitate us gaining an understanding of the measures taken by them to ensure modern slavery is not occurring and effectively prevented in their businesses.
 - Including anti-slavery and human tracking provisions in all our contracts with suppliers.
 - Where possible we aim to build long-standing relationships with suppliers and make clear our expectations of business behaviour in respect of modern slavery.
- 4.2 In the event any prospective supplier represents an unacceptable risk, Genesys will refuse to work with those suppliers.

5. Communication and Awareness of this Policy

- 5.1 Genesys will provide training to its employees on this policy. This will include training on how to identify modern slavery practices and the particular parts of Genesys' business and supply chains which are subject to a greater risk of modern slavery practices.



- 5.2 Our approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 5.3 Genesys will review this policy at least every two years to ensure it remains up-to-date and relevant to Genesys. Genesys will provide information and/or training on any changes that may be made.

6. Breaches of this Policy

- 6.1 All Genesys employees are required to comply with this policy. A breach of this policy by an employee can result in disciplinary action being taken against that employee, up to and including termination of employment. Similarly, any failure of a supplier, contractor or organisation working on our behalf to meet the compliance standards set out within this policy shall result in the termination of any business relationship with that party.