

WEST UC LIMITED Modern Slavery Statement

West UC Limited Statement Regarding Modern Slavery and Human Trafficking Laws.

West UC Limited (“West UC”) is a subsidiary of West Corporation (“West”). West and its subsidiaries have over 9,000 employees worldwide (as of May 2019) operating globally, servicing customers with technology-enabled communication and network infrastructure services.

This statement (the “Statement”) should be read in conjunction with West’s Code of Ethical Business Conduct, employment policies and procedures and its overall ethics and compliance programme. West is committed to continuously improving its practices and procedures to ensure that its business is conducted in compliance with all applicable laws and regulations globally. To that effect, West’s Code of Ethical Business Conduct provides and establishes guiding principles for all of its employees.

The purpose of this Statement is to ensure that West UC is compliant with the principles of the Modern Slavery Act 2015 (the “Act”), including laws against human trafficking in the U.K. and other jurisdictions where West operates. This requires West UC to provide a statement at the end of every financial year setting out its commitment to eradicating any form of modern slavery and human trafficking from its business operations and from any form of its business conduct.

It is West’s policy to comply fully with the Act. West does not tolerate modern slavery and/or human trafficking in any form and any such act is strictly prohibited within its business and its supply chain.

West Employees

West recognises the importance of the duty to respect human rights for its employees. It strives to be in compliance with, and adheres to generally recognised principles of human rights and the applicable national labour and employment laws. West has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting lawfully and in compliance with the principles of the International Labour Organization, rights of individuals as recognised by the International Bill of Human Rights, and other generally recognised international principles prohibiting human trafficking and slavery.

West is highly committed to treating all its employees with dignity and respect and explicitly prohibits human trafficking and the use of involuntary labour. In order to meet this commitment, amongst other things, West ensures all work is voluntary, never withholds workers’ original government-issued ID or travel documentation and ensures that forced labour conditions are not entertained or supported within its business.

Supply Chain

West is committed to ensuring that there is no modern slavery or human trafficking in its supply chain. Its Code of Ethical Business Conduct reflects this commitment to act ethically, lawfully and with integrity in all of its business relationships. West is committed to the implementation and enforcement of stringent contractual controls to ensure modern slavery and human trafficking is not taking place anywhere within West’s supply chain.

In addition, West expects the same high standards from all its contractors, suppliers and other business partners. West includes specific provisions in its contracts that require compliance with all applicable laws and regulations by its contractors, suppliers and business partners. Additionally, West expects that its contractors, suppliers and business partners will hold their own contractors, suppliers and business partners to the same high standards as followed by West itself to ensure that no form of modern slavery or human trafficking exists within their respective supply chains. West believes that with such a progressive and firm approach towards modern slavery and human trafficking, it will increase its positive impact in this sphere.

Internal Training

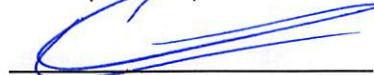
West appreciates and acknowledges the importance of enabling employees across the organisation to understand and respect the principles, objectives and implications of non-compliance with West's Code of Ethical Business Conduct, which specifically addresses human trafficking. This commitment is reflected in the internal training programme that every West UC employee is required to complete on an annual basis, which includes a presentation on the principles of the Act to ensure all employees are fully aware of the compliance requirements set out therein.

The Modern Slavery statement published above has been approved by the Executive Management team of West UC and signed in accordance with the guidelines set out in the Act. West UC recognises that modern slavery and human trafficking are significant global issues and, as such, its Board of Directors will review and update it annually.

Approval for this statement

This statement was approved by the Board of Directors on August 26 2019

Name (Director) Louis Brucculeri



Signature

Date August 26, 2019