



Modern Slavery Statement 2023

Diligenta Ltd. is a business with a clear social commitment since it was founded in 2005. This commitment has shaped us ever since and that's why we continue to do everything we can to make sure modern slavery has no part in the way we conduct business.

Being responsible continues to be embedded through our values and behaviours, our leadership, management and operations. We have an ongoing commitment to fully support the principles of the Modern Slavery Act, and we find any violation of human rights unacceptable. We are also committed to promoting an inclusive environment and providing a rewarding employment experience for everyone.

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Diligenta since the introduction of the Modern Slavery Act, and during the financial year which ended on 31st December 2022, to prevent modern slavery from occurring in our business operations and supply chains.

About Diligenta

Diligenta, a UK-based, FCA regulated, wholly owned subsidiary of Tata Consultancy Services (TCS), is a leading provider of business process services for the Life and Pensions industry.

Established in 2005, Diligenta has a consistent track record of delivering operational transformation to the Life and Pensions industry. Diligenta delivers outstanding customer services and supports its clients both through operational service delivery and in launching new products and propositions. Our aim is to utilise our skills in operational excellence and our in-depth knowledge of life assurance, together with TCS' proven IT, Digital, Platform and delivery capability, to deliver transformation for our clients in a competitive market place.

Assessment of Effectiveness in Preventing Modern Slavery

We are aware of the complex nature of modern slavery and acknowledge that it remains difficult to find and effectively remedy without addressing root causes. Diligenta is therefore committed to protecting and promoting the fundamental right of freedom of association within our business operations and supply chains. We recognise the role that freedom of association plays in protecting vulnerable people against modern slavery and other human rights abuses.

Diligenta has robust on-boarding (background checking) procedures for all our employees and we are confident that the provision of bonded, forced or human trafficked labour would be identified as part of these processes. To date Diligenta has had no concerns, suspected or otherwise, to call into question the validity and/or success of these checks. It continues to be the case that no incidents of potential bonded, forced or human trafficked labour have been brought to light in our organisation.

Our risk profile of eradicating modern slavery continues, therefore, to be focused predominantly on our Supply Chain.

There were no breaches or suspected breaches of this policy in either our business operations or supply chain reported in the past 12 months.

Our Suppliers

Diligenta has a supplier population of 360 for the past 12 months. We manage suppliers across the business within two functions: IT and non-IT, enabling specialised individuals to focus on areas of expertise in combination with business requirements.

Whilst Diligenta manages IT and non-IT suppliers separately, we use a Board approved Supplier Management Policy, including an oversight framework to ensure that regulatory requirements, for example the Modern Slavery Act, are managed holistically within the Supplier Management Team.

This Board approved Policy evaluates our supplier population by potential risk to the business, reputational damage and resilience. The Policy outlines how suppliers are classified.

All Diligenta suppliers are classified using a tiered oversight framework. This classification model forms the basis for the way in which suppliers are governed and overseen. Diligenta ensures all suppliers adhere to the Modern Slavery Act by requesting a copy of their Modern Slavery Statements prior to engagement and high risk suppliers are subject to regular checks, at least once every 18 months, to confirm continued compliance during their period of engagement.

Policies and Contractual Controls

For our Employees

We are governed by the Tata Code of Conduct ('the Code') which represents the values and core principles that guide the conduct of every Tata business. The Code makes it clear that we, as an organisation *"respect the human rights and dignity of all our stakeholders. We do not employ children at any of our workplaces and do not use forced labour in any form. We do not confiscate personal documents of our employees, or force them to make any payment to us or anyone else in order to secure employment with us, or to work with us"*.

Our employment policies comply as a minimum, but for the majority are significantly enhanced, with all statutory employment rights which apply in the United Kingdom. They reflect our commitment for example to pay employees fairly and properly for their work and we continue to align our minimum pay rates to the Real Living Wage, set by the Living Wage Foundation, rather than the set National Minimum Pay rates.

The principle policies that we have in place, including our robust on-boarding background checking procedures, significantly limit the risk of slavery and human trafficking in the workplace from coming about and encourage all employees to work and act ethically and with integrity at all times. The following key policies (this list is by no means exhaustive) which assist us in achieving this are:

- The Tata Code of Conduct
- The Diligenta Code of Conduct Statement
- Whistleblowing Policy
- Modern Slavery Act Statement
- Contract of Employment
- Health & Safety Policies
- Working Time Policy

For our Suppliers

We only seek to work with suppliers and service providers who can demonstrate that they share similar values to our own, and we expect them to adopt ethical standards comparable with our own at all times.

We will not knowingly engage with a supplier involved in any form, suspected or otherwise, of modern slavery or human trafficking.

Since the Act came into force we have:

- Carried out a full risk-based review of all of our suppliers to identify those that may be impacted by any form of modern slavery or human trafficking in our direct supply chain, which is reviewed annually;
- Embedded modern slavery into the ongoing due diligence framework within Diligenta to ensure Modern Slavery Statements are in place, where applicable with the requirements of the Act;
- Engaged with Diligenta low risk contracted suppliers to establish if a Modern Slavery Statement is in existence and, where not, ask that in order to maintain their supply to our organisation our Modern Slavery Statement is adopted;
- All new contracted suppliers are asked to provide a copy of their Modern Slavery Statement (if applicable) or indicate that they are aware of the requirements of the Act.
- Carried out a full appraisal of our entire supplier base to ensure that modern slavery and human trafficking does not take place. This requirement is fully embedded in our processes and is evidenced by appropriate due diligence checks throughout the lifecycle of each contract, depending on the classification tier of the supplier.

We have a zero tolerance approach to modern slavery or human trafficking in any form. If a supplier is seen to breach this policy, or is found to have any form of slavery or human trafficking in their business, or knowingly in their supply chain, we hold the right to terminate the product or services with immediate effect.

Where such information becomes known, we will not hesitate to blow the whistle to the relevant authorities and will support any forthcoming prosecution this may entail.

No breaches of the Modern Slavery Act by Diligenta suppliers were reported during 2022.

Modern Slavery Training

Since the introduction of the Modern Slavery Act, we have completed the following activities:

- Used it as an opportunity to embed greater understanding of human rights within our supply chains;
- Published our Modern Slavery Statement on our intranet for all employees, agency and

third party workers to be able to view;

- Updated our Business Ethics training and test materials to include reference to modern slavery as well as ensuring employees understand how to report any concerns. All employees are required to complete this training on an annual basis;
- Added a new section in the 2019 Statement to provide details of the mechanisms which can be used to report any concerns regarding modern slavery.
- Improved our public awareness and, in accordance with Home Office guidance, continue to publish our Modern Slavery Statements on the gov.uk Modern Slavery Registry and TISCreport.org websites.

Further Developments

Legislation & Guidance

We continue our commitment to monitor the outcome of the UK government's independent review of the Modern Slavery Act 2015 and the subsequent public consultation on transparency in supply chains. Although the government has since confirmed that it will be making significant changes to the provisions in the Modern Slavery Act 2015 it has yet to publish the timeframe for any reforms to be introduced. Therefore, we continue to await the outcome of any changes to the Act and fully commit to address and implement all applicable requirements.

Reporting Mechanisms

Employees, agency workers, third party workers and suppliers with any concerns regarding modern slavery can report them through the following mechanisms:

Independent reporting service: [Safecall](#)

Telephone: [0800 915 1571](tel:08009151571)

On-line incident report: www.safecall.co.uk/report

Further Steps Planned During 2023

We will continue to review and improve our approach in order to fulfil our commitment that modern slavery is not taking place in our supply chains or in our business. As part of this approach we will:

- Modern Slavery Act adherence will continue to be a fundamental part of the Diligenta supplier engagement, with specific contractual clauses defining requirements with continual assessment, where appropriate.
- Await confirmation of any amendments made to the Modern Slavery Act 2015. Action will be taken to ensure we continue to comply with any changes to legislative requirements.

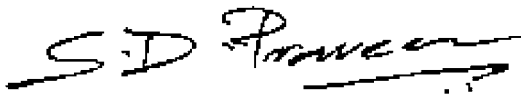
- Review and, if necessary, update our mandatory training and test materials to ensure the information and guidance provided to our employees is up to date and informs them of any key legislative changes they need to be aware of.

Approval of this Statement

As a fast growing and dynamic organisation, we continue to be particularly aware of emerging risks and be alert to the changing nature of both modern slavery and the potential impacts that could emerge from our own operations. We continue to reflect on, develop and mature our approach to modern slavery across all of our supply chains and ensure that good practice is at the core of all procurement and supplier management work.

Diligenta's Modern Slavery Statement 2023 is approved for and on behalf of the Board of Directors on 14th March 2023.

Signed

A handwritten signature in black ink, appearing to read 'S.D. Praveen', with a horizontal line underneath.

Daniel Praveen
Chief Executive Officer