Modern slavery statement

This statement is made pursuant to Clause 54 of the Modern Slavery Act 2015 and sets out the steps that EXL Holdings, Inc. (“EXL Holdings”) at its subsidiaries (together “EXL”) have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. This statement has been approved by the Board of EXL Holdings and each of its subsidiaries adopting this statement.

Modern slavery statement

EXL has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings, including putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains. EXL does not believe there is any place in today’s world for slavery or human trafficking. We are committed to continually improving our practices to combat slavery and human trafficking and to encourage the same high standard from our supply chains and other business partners.

Our policies on slavery and human trafficking

EXL, providing solutions to integrate operations management service, analytics and technology platforms to deliver immediate results and long-term business impact, operates globally with offices in the United States, Europe, Latin America, Asia, Mexico and South Africa. We have over 50,000 employees globally across more than 50 locations.

Our supply chains include a diverse base that reflects the values of our clients around the world. EXL works with suppliers that support our long-term grown objectives, assist us in providing best-in-class services to our clients, and add value to our business by helping to drive competitive advantage and achieve strategic and operational goals.

We are committed to building a strong network of diverse suppliers and our Supplier Diversity Programme ensures that suppliers have an equal opportunity to participate in our sourcing process. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We ensure that our suppliers adhere to all applicable laws of the geography in which they operate and ensure that there is no forced labour, slavery or human trafficking by operating a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We operate a robust recruitment policy, including conducting eligibility to work in the UK, and/or international territory checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Our Ethics and Anti-Bribery and Corruption Policy sets out the organization's stance on ethical behavior and EXL's expectations of integrity, honesty, moral and awareness of human rights from all employees and zero tolerance to fraud, dishonesty, bribery and corruption. EXL's Code of Conduct and Ethics outlines our high ethical standards and reminds us how we must conduct ourselves on a day-to-day basis, wherever we do business, in order to better serve our clients. Our Code of Business Conduct ("Employee Handbook") explains the manner in which we behave as an organization and how we expect our employees to act. We operate a Whistleblowing Policy, detailed in the Employee Handbook, so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chains, without fear of reprisals.

We are guided by a number of other policies and procedures dealing with highly critical areas including, but not limited to Diversity and Inclusion Policy, Environmental, Health and Safety Policy, and Corporate Social Responsibility Policy. These policies and procedures keep us committed to the best in class ethical and compliance standards in our day-to-day business.

Due diligence

In addition to our policies, our supplier contracts are built to ensure that our supply chain process is compliant with all applicable laws, statutes, rules, and/or regulations for the purposes of their obligations, operations, business or affairs. We undertake due diligence and evaluate potential suppliers thoroughly against a strict set of business requirements before the suppliers can provide goods and/or services.

Further actions

In order to mitigate and manage risk, the following activities are being undertaken in 2023/2024:

- Modern slavery training published to EXL employees, as applicable and this will be refreshed annually.
- Employees have been advised on how they can report any concerns they may have associated with modern slavery.
- Relevant provisions added to commercial contracts to ensure compliance with obligations within our supply chains.
- Regular risk assessments to identify and assess potential risk areas in our supply chains, introducing the use of due diligence questionnaires. There were no breaches of the Modern Slavery Act reported during 2023.

We review our policies and procedures regularly, not only to ensure they remain relevant, but also to assess our progress. This statement applies to EXL and all its subsidiaries for the financial year ending 2024.



Signed by

Rohit Kapoor – Chairman and Chief Executive Officer, EXL
December 13, 2024