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"HCLTech"

Modern Slavery Statement



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Introduction

HCL Technologies UK Limited (hereinafter referred to as "**HCLTech UK**" or the "**Company**") is committed to making significant and long- lasting improvements to workers' employment, workplace conditions, systems and processes related to its operations through its commitment to the complete eradication of human trafficking, child labour, and forced labour throughout its supply chain.

This statement is to meet **HCLTech UK's** obligation to comply with section 54(1) of the Modern Slavery Act, 2015 guided by the United Nations Universal Declaration of Human Rights and the conventions of the International Labour Organization (ILO) with a zero-tolerance approach to human trafficking, bonded labour, child labour, Slavery and servitude.

This statement is published to demonstrate our compliance with and adherence to the Modern Slavery Act 2015 in all aspects of our operations including but not limited to procurement processes, policies and procedures, employee practices and business management.

ORGANISATION'S STRUCTURE

HCL Technologies UK Limited is a group company of **HCL Technologies Limited ("HCLTech")** registered with the Registrar of Companies for England and Wales and operating in the **United Kingdom**.

HCLTech offers an integrated portfolio of products, solutions, services, and IP around Digital, IoT, Cloud, Automation, Cybersecurity, Analytics, Infrastructure Management and Engineering Services, amongst others, to help enterprises reimagine their businesses for the digital age.

HCLTECH's SUPPLY CHAINS

Our operations are supported by a global supply chain for goods and services. This supply chain includes suppliers of goods, technology related products and services, software and skilled labour.

HCLTech UK's contracts with all suppliers explicitly cover aspects relating to the adherence to Modern Slavery Act 2015. We expect all our suppliers to comply with the provisions set out in the Act to ensure that all facets of human integrity are upheld, thereby helping to eradicate human trafficking. We would also like to strongly uphold that we have zero tolerance for non-adherence to this aspect and any reported violation will be addressed in accordance with applicable legislation.

OUR GOVERNANCE AND POLICIES

The principles of Trust through Transparency and Accountability are the core of **HCLTech's** existence. **HCLTech** ensures strict compliance with ethical and legal standards across the company and also adheres to the Human Rights principles. These principles extend not only to the employees but also third parties, client's suppliers or parties legally associated with the operations relating to the Company.

Mentioned below are key policies that mark our adherence to an acceptable operating standard in **UK**:

1) **Code of Business Ethics and Conduct**: We have prescribed a Code of Business Ethics and Conduct (COBEC) that provides for transparency, ethical conduct, a gender friendly workplace, compliance with all applicable regulatory requirements and protection of the Employee rights and dignity. COBEC is a set of guiding principles and covers all directors, employees, third party vendors, consultants, suppliers and customers across the world. As per COBEC, HCLTech's relationships with suppliers are to be based on lawful, efficient and fair practices. Consequently, we expect our suppliers to obey our policies and the local laws that require them to treat employees fairly, provide a safe and healthy work environment and protect the quality of the environment.

2) **Anti-Bribery and Anti-Corruption Policy:** This policy prohibits any practices related to corruption, or any practice that can potentially lead to corruption. HCLTech has very stringent processes that do not permit such practices in supply chain or the business environment.

3) **Procurement Process:** The procurement team has defined elaborate process guidelines which are to be followed by all the companies in the HCLTech group, including HCLTech UK for the purposes of procuring requisite goods and services from vendors across the globe. It is our endeavour to ensure that we meet global standards & follow best practices in business engagements with all our vendors. Agreements on critical expectations from suppliers regarding the management of supply chain and integrity in operation with due compliance to all legal standards are documented in the contracts for reference and records.

4) **Human Rights Policy**: HCLTech also has Human Rights policy that describes how HCLTech values its workforce and ensures that they are provided with a respectful and secure environment to operate. This policy is closely

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linked to various other policies like: "*Occupational Health Safety and Environmental Policy"* which further focuses on a conducive environment for our workforce.

REPORTING MECHANISM

In the event of any non-compliance to any of our above stated policies by our employees, customers or suppliers or if they are found to be in violation of the same or found to be involved in unethical practices, they, along with their representatives, may be prohibited from doing any business with HCLTech.

HCLTech has a **Whistleblower Policy** that encourages reporting of the violations of any of the above stated policies. Such reporting can be done by employees or anyone outside the organization too. Reporting done under this policy are handled by a third party to ensure a non-biased approach. There is a defined process to look into any non-compliance that may arise from any of the actions that are not compliant as per the Company's norms.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING IN SUPPLY CHAIN

As part of our initiative via various policies as listed above, HCLTech has a framework to identify and mitigate risks:

1) By conducting due diligence on our suppliers and their activities before they are engaged. All such is done via appropriate assurance to adhering all organization policy and laws of the land.

2) HCLTech has signed the UN Global Compact since 2011 confirming its voluntary commitment to abide by the ten UN principles on Human Rights.

3) HCLTech does required due diligence prior to engaging with suppliers and ensures long lasting relationships to strengthen the commitments towards such practices.

4) All our policies focusing on governance of these aspects are periodically reviewed to ensure that they are at par with the global best practices and laws of the land.

RISK ASSESSMENT AND MANAGEMENT

Supplier risk assessment is conducted for all suppliers of products and services procured by HCLTech. The evaluations include verification of steps taken by our suppliers to prevent modern slavery in their operations as well as in their supply chains. HCLTech reserves the right to undertake supplier audits.

We recognize that certain regions where we and our suppliers operate present a higher risk of modern slavery due to socio-economic and regulatory factors.

To mitigate these risks, we have strengthened our supplier onboarding process to include mandatory compliance checks, contractual obligations on labour standards, and regular audits for vendors operating in higher-risk regions. We continue to monitor these supply chains closely and provide targeted training to key procurement and operational teams**.**

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN.

HCLTech is in the knowledge-based industry and its activities involve low risk of Modern Slavery and adverse working conditions. HCLTech respects fundamental human rights and decent working conditions within its scope of business and addresses it through the Code of Conduct, Policies and Procedures. As regards to our supply chain, our engagement process with the vendors and the Codes governing their onboarding ensure that the risk of Modern Slavery and adverse consequences to human rights and working conditions are minimal.

To address any residual risk, HCLTech is continuously reviewing policies and procedures for improvement, and assessing the effectiveness of measures taken in this regard on an ongoing basis using the following key performance indicators:

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- We have not received any cases with respect to Modern Slavery in FY 2025-2026.
- More stringent supplier engagement with detailed clauses to comply with the Modern Slavery Act, 2015.
- Every contract entered with Supplier has stringent clauses with respect to Modern Slavery.
- For PO based transaction, general T&Cs are part of each PO that specifies detailed Modern Slavery clauses.
- Our Vendor Onboarding Assessment process covers Modern Slavery as one of the key risk domains while onboarding a new vendor in HCLTech system.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

To ensure a high level of understanding of the governance policies as mentioned above, all suppliers are required to make themselves aware of all relevant policies and laws (as applicable). A clause is added to each contract specifying strict compliance of above stated policies and termination rights in case of non-compliance. Our employees are also provided training on COBEC. We intend to implement more robust training programmes in the future for awareness and adherence.

This statement is made for the financial year ended on **31 March 2026**.

The Board of Directors of **HCL Technologies UK Limited** has approved this statement by written resolution dated **September 18, 2026**

Signed by:
Goutam Rungta
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Goutam Rungta
Director
HCL Technologies UK Limited
September 18, 2026