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THE ZENSAR TECHNOLOGIES GROUP OF COMPANIES – MODERN SLAVERY STATEMENT FOR 2024

INTRODUCTION FROM Mr. Manish Tandon and Mr. Chaitanya Rajebahadur

This is a joint statement, published on behalf of Zensar Technologies Limited and Zensar Technologies (UK) Limited (the "Organisation").

Zensar Technologies (UK) Limited recognises that it meets the criteria outlined by the UK Government in order to have to produce an annual modern slavery statement and takes responsibility for this.

The information included in the statement refers to the financial year ending 31st March 2024.

As an organisation, Zensar Technologies (UK) Limited are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

OUR BUSINESS AND ORGANISATION STRUCTURE

Zensar Technologies (UK) Limited is under the parent company Zensar Technologies Limited, based in Pune, India. Zensar Technologies Limited forms part of the RPG Enterprises Group.

The Organisation is controlled by a Board of Executive and Non-Executive Directors.

Zensar Technologies (UK) Limited is based in Reading, United Kingdom. The registered address is Floor 100 Brook Drive, Green Park, Reading, Berkshire, United Kingdom, RG2 6UJ,

Zensar Technologies (UK) Limited employees approximately 300 staff.

The main activity carried out by the Organisation is IT services and consulting. We conceptualise, build, and manage digital products that are customer-centric and future-ready for leading companies, harnessing the power of experience design, data engineering, and advanced analytics. Demand for our services is consistently high throughout the year and is therefore not seasonal.

The labour supplied to the Organisation in pursuance of its operation is carried out in the United Kingdom, as listed above, as well as abroad, namely in Austria, Germany, Poland, , Republic of Ireland, Switzerland and The Netherlands.

Further information is available about the Organisation on www.zensar.com.

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DEFINTIONS

The Organisation understands that modern slavery is wide-reaching, and encompasses the following in relation to work and employment:

- human trafficking,
- debt bondage,
- criminal or sexual exploitation,
- forced work, through mental or physical threat,
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse,
- dehumanisation, being treated as a commodity or being bought or sold as property,
- being physically constrained or having restrictions placed on freedom of movement.

SUPPLY CHAINS

The primary suppliers in our supply chain are third party companies and Zensar group companies that supply Zensar Technologies (UK) Limited with resources.

Providing IT and consultancy services, the Organisation recognises that whilst it does not have a clear and direct supply chain of goods and materials it uses in the production of its' services, it does purchase goods and services from suppliers that indirectly support the running of the business.

Other suppliers within our supply chain include hardware and software suppliers, office facilities suppliers, infrastructure suppliers, travel, hospitality services suppliers, cleaning service suppliers, and suppliers of furniture and equipment used in our offices.

POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of modern slavery and human trafficking to exist in its procurement and purchasing of goods that are used internally.

The Organisation also recognises the risk of modern slavery in its' recruitment practices, and to combat this we always conduct full and proper checks to ensure that all candidates, whether from the UK or overseas, have the right to work.

In general, the Organisation considers its risk level of exposure to modern slavery and human trafficking to be relatively limited, due to the nature of the services it provides which does not require raw materials.

Nonetheless, we are committed to taking steps to ensure that such practices do not take place within the business nor the business of any organisation we supply our services to. The Organisation does not enter into business with suppliers or clients who knowingly support or involve themselves in modern slavery or human trafficking.

COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

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Zensar Technologies (UK) Limited does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees. This includes paying at least the National Minimum Wage and allowing employees ample rest time in line with the Working Time Directive.

OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

Corporate Social Responsibility is extremely important to Zensar Technologies (UK) Limited and can be summarised as follows:

- Our vision is to foster happiness and well-being of people and communities, thereby enabling them to realise their full potential,
- Our mission is to build empowered communities and foster the agency of individuals to lead and subsequently enable social transformation,
- Our values are to help people live with dignity, equality, empathy, integrity, freedom, and creativity – and lend wings to their dreams.

We view our policy on slavery and human trafficking as an extension of these duties to conduct our business in an ethical and socially responsible way.

Modern slavery falls under our Equal Opportunities Policy and Code of Corporate Governance and Ethics. As confirmed in the last year's statement, the Organisation introduced a new Anti-Slavery Policy, which reinforces our aim to outlaw slavery across our business.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. This extends to our suppliers and organisations we work with.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery in the previous financial year, or ever.

The Organisation will seek to monitor any risk areas and encourage anyone to report any concerns regarding supplier activities.

STEPS TAKEN IN THE 2023 - 2024 FINANCIAL YEAR

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery did not take place, during the previous financial year:

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- Employees and workers were provided with at least the minimum employment conditions required by UK law,
- Wage levels were audited monthly through the Organisation's payroll,
- Checks were carried out prior to engaging employees, workers, or contractors to ensure that they were eligible to work in the United Kingdom,
- The Organisation engaged with an external consultancy to complete a full audit of our current policies, processes, and knowledge of modern slavery and reporting requirements to support our commitment to anti-slavery going forward.
- Created a dedicated Modern Slavery Policy which is accessible to all members of the Organisation
- A clear and concise modern slavery reporting procedure was developed which now sit alongside our existing whistleblowing procedure
- Subcontractors are strictly asked to agree to Organisation's supplier code of conduct which includes a confirmation of compliance to the UK Modern Slavery Act of 2015.
- The Organisation will continue to ensure employees and suppliers can register their concerns, ask queries, questions and seek guidance from the taskforce by simply writing to combat.mslavery@zensar.com.

STEPS TO BE TAKEN IN THE 2024 – 2025 FINANCIAL YEAR

The Organisation will continue with the above actions completed in the previous financial year.

Following an independent review of our current reporting procedures and company-wide policies by an external HR consultancy, the Organisation also intends to take the following actions to combat modern slavery in the upcoming financial year:

- Completion of UK-specific Supplier Code of Conduct and Recruitment Policy, incorporating the principles of Modern Slavery,
- Training sessions will be offered to enhance knowledge of modern slavery and spotting signs of risk.
- An accompanying e-learning course will be designed for all employees, giving an overview of modern slavery and showing what individuals can do to support the Organisation in preventing exploitation.

OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING

The Organisation has set the following key performance indicators (KPIs) to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains:

- All concerns raised regarding modern slavery will be logged and dealt with within appropriate timescales, as will be set out in our upcoming reporting procedure,

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- Appropriately selected employees will have received training, whether this is a live session, recording, or e-learning module, covering modern slavery by 31st March 2025,

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- All new suppliers brought on-board during the financial year will be risk assessed and selected carefully.

POLICIES

The Organisation has the following policies, which are under review at the time of publication of this statement, and when amended will further define our stance on modern slavery:

- Employee Code of Conduct
- Anti-Corruption & Bribery
- Whistle Blower Mechanism
- Equal Opportunities & Human Rights
- Corporate Social Responsibility

ACKNOWLEDGEMENT

Following a review of the effectiveness of the steps we have taken to ensure that there are no practices that encourage slavery or human trafficking in our supply chains we will continue to improve our processes, continue to encourage our principals and staff to report any concerns they have. We will continue to ensure that we comply with the statutory requirements.

This statement is made by Zensar Technologies (UK) Limited, also covering Foolproof Limited (a subsidiary of Zensar Technologies (UK) Limited), in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year. This statement covers the financial year running from 1st April 2023 to 31st March 2024.

This statement has been approved by the Board of Directors.

Signed by a Director of Zensar Technologies Limited:

Signed:		**Name:**	Mr. Manish Tandon
Position:	CEO & Managing Director	**Date:**	27.09.2024

Signed by a Director of Zensar Technologies (UK) Limited:

Signed:		**Name:**	Mr. Chaitanya Rajebahadur

Position:	EVP and Head of Europe	**Date:**	26.09.2024