

MODERN SLAVERY ACT STATEMENT – MPHASIS LIMITED

Introduction from Eric Winston, EVP, General Counsel, Chief Ethics and Compliance Officer

According to the UK Modern Slavery Act 2015, Modern Slavery can take many forms, including human trafficking, forced labor, servitude, and slavery.

Mphasis Limited, and its subsidiaries (Mphasis), are committed to ensuring that there is no slavery or human trafficking taking place in its supply chain or in any part of its business. Respecting human rights and environmental laws is a priority within our enterprise. At Mphasis, we play an active role in employee and supplier development and have adopted various means to clearly communicate our expectations to all.

About Mphasis

Mphasis Limited provides next-generation software solutions to global businesses. The company's software products include business process outsourcing, infrastructure technology, and application services.

Headquartered in Bangalore, India, Mphasis Limited's group global footprint encompasses 60 sales locations in 19 countries. The group has a turnover exceeding USD 1 billion.

Our Business

Mphasis applies next-generation technology to help enterprises transform businesses globally. Customer centricity is foundational to Mphasis and is reflected in the Mphasis' Front2Back™ Transformation approach. Front2Back™ uses the exponential power of cloud and cognitive to provide hyper-personalized (C=X2C2 TM=1) digital experience to clients and their end customers. Mphasis' Service Transformation approach helps 'shrink the core' through the application of digital technologies across legacy environments within an enterprise, enabling businesses to stay ahead in a changing world. Mphasis' core reference architectures and tools, speed and innovation with domain expertise and specialization are key to building strong relationships with marquee clients.

Our Supply Chains

Our supply chain is made up of business relationships with products and services that we use in our business; employees, partners, suppliers, and contractors. The supply chain is managed by group procurement which operates as a single function across all the business lines. We continue to work with a diverse set of suppliers who are financially stable and ethically responsible. As part of our initiative to identify and mitigate risk, our procurement team strives to continuously improve and support our business to have an effective sight of our supply chain

Our Code of Business Conduct

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. Our Code of Business Conduct (**COBC**) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

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The Mphasis COBC explicitly forbids violations of human rights. Instead, we encourage all employees and suppliers to respect one another. All employees and suppliers are subject to the COBC policy and any violation may lead to verbal reprimand, termination from the company, termination of supplier contracts and in some cases, legal action. Employees who become aware of or who suspect violations of the COBC or company policy, law or regulation related to Mphasis business, are obligated to report such concerns through the various channels outlined in the COBC.

Internal due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place the following systems:

Training: Mphasis provides annual training to all of our employees based on our COBC. This is followed by an assessment to ensure, among other best practices, that all employees understand and abide by Mphasis' stance on respecting human rights. All employees must complete this assessment. Failure to do so results in a negative impact on their annual appraisal rating.

Background Checks on Employees: Mphasis conducts background checks on all employees to make certain that they abide by laws and regulations before hiring them.

Ongoing Internal Reviews, Assessments, and Audits: Mphasis regularly reiterates to employees that any violations of the COBC, including human rights violations, must be reported and escalated appropriately through the organization. From time to time, we conduct internal reviews, assessments, and audits of employee performance to ensure best practices are being followed.

Monitoring of potential risk areas in our supply chains: Mphasis monitors its supply chains for emerging risk areas and, where necessary, implements extra safeguards and sampling methods.

Protection of whistle blowers: Mphasis is committed to protecting any member of staff who discloses information relating to malpractice. All staff are made aware of their reporting lines and the expectation that they will report wrongdoing, and that they will be protected if they make a disclosure of potential wrongdoing in good faith.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our COBC we have in place a supply chain compliance programme. This consists of:

Contractual Measures: All Mphasis purchase order terms and conditions include Mphasis' zero tolerance stance on Modern Day Slavery and suppliers are required to adopt the same position when doing business with Mphasis. Supplier contracts also include clauses allowing for termination of agreements if a supplier engages in acts that Mphasis deems contrary to human rights;

Background Checks: We contractually require suppliers to conduct background checks within their own organizations, on both employees and sub-contractors. If we discover negative findings, contrary to our organizational risk appetite or reputational appeal, we terminate further engagement;

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Monitoring potential risk areas in our supply chains: Mphasis monitors its supply chains for emerging risk areas and dip samples supply chains for compliance; and

Ongoing External Reviews, Assessments, and Audits: Mphasis encourages that any violations of the COBC, including human rights violations, be reported and escalated appropriately by suppliers. From time to time, we conduct reviews, assessments, and audits of supplier performance to ensure best practices are being followed.

Further steps

Following a review of the effectiveness of the steps we have taken since 2017 to ensure that there is no slavery or human trafficking in our supply chains we will continue to take the following steps to combat slavery and human trafficking:

1. Include Mphasis' zero tolerance stance on Modern Day Slavery in our Terms and Conditions for all contracts and to require that all suppliers adopt the same position when doing business with Mphasis;
2. Maintain clauses allowing for termination of agreements if a supplier engages in acts contrary to human rights;
3. Continue companywide trainings to include Modern Day Slavery training to all national and international employees; and
4. Request suppliers to pass contractual anti-slavery obligations down the supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year ending 2020. It was approved by the board on 13 May 2020.

For Mphasis Limited

Nitin Rakesh
Chief Executive Officer and Executive Director

13 May 2020