

## MODERN SLAVERY ACT STATEMENT – MPHASIS LIMITED

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

According to the UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018 (Cth), Modern Slavery can take many forms, including human trafficking, forced labor, servitude and slavery.

This statement is made jointly on behalf of Mphasis Limited and its subsidiaries, Mphasis Australia Pty Ltd and Mphasis UK Ltd.

**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 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' group global footprint encompasses 60 sales locations in 19 countries. The group has a turnover exceeding USD 1.6 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 ( $C=X2C^2_{TM}=1$ ) 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. Recognising that the greatest risk of modern slavery practices is in our supply chains, as part of our initiative to identify and mitigate risk, our procurement team strives to continuously improve and support our business to have effective oversight 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. 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 wrong doing, and that they will be protected if they make a disclosure of potential wrongdoing in good faith. If staff do not feel comfortable disclosing information to their reporting lines, Mphasis has a whistleblower hotline (whistleblower@mphasis.com) in place.

### 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 Terms and Conditions include Mphasis' zero tolerance stance on Modern Day Slavery and require suppliers 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. Mphasis is committed to implementing these contractual measures with suppliers, given this is where there is a risk of slavery or human trafficking taking place;

**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;

**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

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**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.

### Progress and Further steps

Since Mphasis began publishing Modern Slavery Statements in 2017, we have continued to train our staff on their obligations regarding modern slavery. Mphasis also maintains a robust supplier onboarding to ensure all applicable rules and regulations are followed and maintained through the supplier chain relationship.

To ensure that the risk of slavery or human trafficking in our supply chains is minimized 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.

A copy of this statement is published on the Australian and UK Modern Slavery Statement Registers and on our website.

**Consultation with Entities** In order to prepare this joint statement, Mphasis Limited engaged with each of the reporting entities covered by this statement (including their subsidiaries) and received their feedback and approval prior to the statement being approved.

This statement is made pursuant to section 54(1) of the *Modern Slavery Act 2015* (UK) and section 14 of the *Modern Slavery Act 2018* (Cth) and constitutes our group's slavery and human trafficking statement for the financial year ending 2025. It was approved by the Board on 1 February 2024.

**For Mphasis Limited**

Sd/-

**Nitin Rakesh**  
**Chief Executive Officer and Managing Director**  
1 February 2024