

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 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 pursuant to the UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018 (Cth) and any other applicable Modern Slavery regulations.

Mphasis Limited and its subsidiaries (Mphasis), are committed to preventing acts of modern slavery or human trafficking from occurring within its supply chain or in any part of its business and imposes the same high standards on its suppliers.

Respecting human rights and labour 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 communicate our expectations to all.

About Mphasis and Structure of the Organisation

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

Headquartered in Bangalore, India, Mphasis' group global footprint encompasses 60 sales locations in 26 countries and employs 32,992 people worldwide. The group has a turnover exceeding USD 1.6 billion for the financial year ended 31 March 2024.

To find out more about the nature of our business, please click www.mphasis.com.

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. Recognizing 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.

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Policies

As part of our commitment to combatting modern slavery and/or human trafficking in our supply chains or in any part of our business, we have developed our Code of Business Conduct (**COBC**). This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking from occurring anywhere in our supply chains.

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, laws or regulations related to Mphasis business, are obligated to report such concerns through any of the channels outlined in the COBC.

Risk assessment

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain by reflecting it in all our agreements with the vendors and also in the PO T&C.

We do not consider that we operate in high risk sectors or locations which are more prone to Modern Slavery risks considering our business relies heavily on skilled professionals who require significant education and training, we do not rely on large scale manual labor where incidents of modern slavery are more commonly found, we are vigilant with our supply chain and align with like-minded vendors, and are highly focused on overall risks including reputational, of failing to comply with all laws and regulations.

If a potential risk is identified, Mphasis would investigate the through its Chief Risk Office, and mitigate any potential threat to our compliance as well as identify improvements necessary to avoid similar risks in the future.

Effectiveness and KPIs

Mphasis uses key performance indicators (KPIs) to measure how successful we have been in ensuring that modern slavery and human trafficking is not taking place in any part of our business or supply chains. These include but are not limited to:

- Percentage of contracts including modern slavery clauses.
- Compliance rate with legal reporting requirements, to include publication of the Modern Slavery Statement.
- Number of suppliers who have acknowledged and agreed to comply with Mphasis' modern slavery policy.

Internal due diligence processes for modern 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, so long as legally permissible in the employees' jurisdiction, to make certain that they abide by laws and regulations before hiring them.

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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 chain: 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. If staff do not feel comfortable disclosing information to their reporting lines, Mphasis has a whistleblower hotline (whistleblower@mphasis.com) in place.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chain;
- monitor potential risk areas in our business and supply chain;
- reduce the risk of slavery and human trafficking occurring in our business and supply chain; and
- provide adequate protection for whistleblowers.

Supplier adherence to our values and ethics

We have zero tolerance to modern 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

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:

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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 2026. It was approved by the Board on 22 January 2025.

For Mphasis Limited



Sd/-

Nitin Rakesh

Chief Executive Officer and Managing Director

22 January 2025