

**MODERN SLAVERY STATEMENT UNDER THE MODERN SLAVERY ACT 2018 (CTH) –  
GENPACT AUSTRALIA PTY LIMITED ACN 616 571 423 – 01 JANUARY 2022 TO 31  
DECEMBER 2022**

1. **Identity of Reporting entity and Financial Year**

The reporting entity is Genpact Australia Pty Limited (ACN 616 571 423) ('Genpact Australia'). This Modern Slavery Statement relates to Genpact Australia's financial year commencing 1 January 2022 and ending 31 December 2022.

2. **The reporting entity's structure, operations and supply chains**

**Structure and operations**

- 2.1 Genpact Australia was incorporated in New South Wales Australia on 22 December 2016 and has its registered office and principal place of business at Suite 301, Level 3, 55 Clarence Street Sydney NSW 2000.
- 2.2 Genpact Australia is a subsidiary of Genpact Limited (together with its direct and indirect subsidiaries, 'Genpact' or the 'Genpact Group'), a Bermuda company listed on the New York Stock Exchange. Genpact is a global professional services provider of business support services focusing on technological innovation and digital transformation.
- 2.3 The Genpact Group has office locations in more than 30 countries and approximately 110,000 staff.
- 2.4 As a member of the Genpact Group, Genpact Australia provides business services to Australian and international clients, including IT managed services, master data management, IT infrastructure services, supply chain management, collections, finance and accounting, and industrial solutions, in the Banking & Capital Markets, Insurance, Consumer Goods, Retail, Life Sciences and Health, and Hi-Tech Manufacturing and Services sectors.

### **3 Suppliers and supply chains**

Most of Genpact Australia's suppliers are based in Australia. It also receives services (such as technology, digital and business process services) from other members of the Genpact Group to support its services to clients.

Its main suppliers are:

- a) software companies (Australian and international), that provide software that it embeds into its products;
- b) subcontracting companies (Australian) that provide sub-contracted human resources on client projects;
- c) IT infrastructure suppliers (international);
- d) facilities infrastructure suppliers (international); and
- e) ancillary administrative services (Legal, Professional consultancy, Travel services etc.).

### **4 The risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls**

As a professional services company, the risk of Modern Slavery within Genpact Australia's direct business operations, is considered to be low, although Genpact recognises that it can be indirectly exposed to these risks, in particular through its supply chain and client relationships. The risk is also likely to occur where employees, contractors or suppliers are operating in circumstances where forms of Modern Slavery are being practiced.

Genpact takes a risk-based approach to manage Modern Slavery risk in its supply chain, business operations and client relationships.

**5 The actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes**

5.1 Genpact is committed to a program of continuous improvement in its practices to combat the risk of slavery and human trafficking in its operations and supply chains.

5.2 In 2022 Genpact has, as a group

- a) continued to develop and maintain the action plan implemented in 2016 by the establishment of a Risk Council [see clause 5.3 (e)] and the remaining ongoing activities in order to ensure continuous compliance;
- b) implemented a new Third-Party Code of Conduct: Integrity@Genpact, to update Genpact's expectations on preventing modern slavery and human trafficking in its operations and supply chains;
- c) maintained its internal team to work on modern slavery issues comprising members of the Legal and Compliance, Human Resources, Sourcing, Enterprise Risk Management, Audit, and Vendor Governance Organization groups;
- d) maintained and reviewed its Anti-Slavery and Human Trafficking Policy;
- e) maintained a Critical Incident Response Plan;
- f) continued to train key personnel on the requirements of the Modern Slavery Act and its standard approach to combatting modern slavery and human trafficking in its operations and supply chains;
- g) updated standard modern slavery clauses in its supplier terms and conditions; and
- h) updated its supplier due diligence process relating to the Modern Slavery Act.

5.3 It is Genpact's policy to conduct its business ethically and in accordance with the Australian and UK Modern Slavery Strategy, as amended from time to time, and as outlined in the Home Affairs 'Guidance for Reporting Entities'. Genpact has also drawn on relevant employment and labour laws for addressing business-related human rights harm.

- a) Genpact is committed to acting ethically in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter slavery and human trafficking.
- b) Genpact provides additional specific training to those members of staff who are responsible for compliance with the steps taken by it to combat Modern Slavery practices and its Modern Slavery Policy. The aim of the training is to ensure a high level of understanding of the nature of Modern Slavery and the influence Genpact is able to exert to ensure that it does not occur within any part of its own business and in any of its supply chains. Genpact directs its contractors, suppliers and other business partners to provide similar training to their members of staff.
- c) As part of its initiative to identify and mitigate risk, Genpact requires its suppliers to sign up to a code of practice and to respond to a Modern Slavery Act Questionnaire, as part of its onboarding process to engage with any new supplier.
- d) Genpact's Anti-Slavery and Human Trafficking Policy is a first step towards the company having in place systems to:
  - (i) identify and assess potential risk areas in its operations and supply chains;
  - (ii) mitigate the risk of slavery and human trafficking occurring in its operations and supply chains;
  - (iii) monitor potential risk areas in its operations and supply chains; and
  - (iv) protect whistle-blowers.
- e) Genpact constituted a formal Risk Council in 2016. The Risk Council reviews the Genpact Group's overall risk profile periodically and reports the key business risks to the board of directors of Genpact Limited. Annually, an enterprise-wide risk assessment across functions, businesses and regions is conducted and risks to the organization are

identified and assessed on the likelihood and impact scale. The Council continues to develop and maintain the action plan implemented in 2016.

- f) Genpact conducts external risk surveys and industry benchmarks to evaluate the Genpact's risk landscape against the industry and look for external risk drivers that could affect Genpact.
- g) Changes in the regulatory and legal environment, such as the Modern Slavery Act, and the criminal and societal issues which those changes aim to address, which could have an impact on the organization are also subject to the regular risk assessment activity.
- h) Genpact released bi-annual sustainability communications starting in 2008 and began releasing annual reports starting in 2021. The assurance is in accordance with the limited assurance criteria of the International Standards on Assurance Engagements' (ISAE) 3000. While the earlier communications were based on the 10 principles of the United Nations Global Compact, Genpact started reporting on sustainability performance using the more comprehensive Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB) standards. These regular reports provide a holistic picture of its performance, covering environmental, social, and ethical criteria in addition to economic data which also includes its supply chain.
- i) To ensure that its supply chain and contractors comply with its values and ethics Genpact has designed and rolled out a supply chain compliance program.
- j) Genpact has dedicated resources from the following departments:
  - Legal and Compliance;
  - Audit;
  - Vendor Governance Organization;
  - Enterprise Risk Management;
  - Human Resources; and

- Sourcing

- k) Genpact undertakes appropriate due diligence of its current and potential suppliers, using a risk based approach. Suppliers are required to complete a self-assessment on Modern Slavery standards as part of a preliminary vetting process. Supplier contracts also include a Modern Slavery clause where suppliers are required to represent, warrant and covenant that to the best of their knowledge, they are not using slavery, forced labour, and/or human trafficking in any part of their business or in any part of their supply chains.
- l) In August 2020, Genpact updated its third-party due diligence compliance screening process. At the time of onboarding a new third party, Genpact performs a screening against several risk drivers (including “adverse media”) for the relevant categories of third parties. This screening should capture any publicly available adverse media information, including on modern slavery and human trafficking (if any) with respect to the third party. The compliance screening on adverse media is performed on an ongoing and regular basis.
- m) Genpact responds to, and investigates all concerns promptly, and takes any necessary corrective actions, if necessary. Its whistleblowing program did not register any notifications related to Modern Slavery in the relevant financial year.
- n) Genpact Australia understands that it is captured by the Modern Slavery Act because:
  - i. It is a body corporate;
  - ii. It is based in Australia;
  - iii. It carries on business Australia
  - iv. It supplies services in Australia; and
  - v. It had an annual turnover of over AUD 1 million per annum in the relevant financial year.

## **6. Remediation processes**

6.1.1 In the event that Genpact has a reasonable belief that Modern Slavery is occurring in any part of its business it will:

- a) put in place remedial action as soon as reasonably practical with a view to ensuring that such Modern Slavery ceases to occur and that the victims of that Modern Slavery are appropriately safeguarded;
- b) monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims; and
- c) depending on the facts, deal with the matter under its disciplinary procedures which could result in the dismissal of any member of staff found to be responsible.

In the event that the Company has a reasonable belief that Modern Slavery is occurring in the business or supply chains of any contractors, suppliers and other business partners, it will:

- a) direct the relevant contractor, supplier or other business partner to be fully transparent and supply such information as the Company may reasonably request in relation to the issue;
- b) put in place remedial action as soon as reasonably practical with a view to ensuring that such Modern Slavery ceases to occur and that the victims of that Modern Slavery are appropriately safeguarded;
- c) monitor the effectiveness of the remedial action taken including the actions taken to safeguard the victims; and
- d) report at reasonable intervals on the effectiveness of that remedial action and safeguarding and any further steps taken to ensure that such Modern Slavery ceases to occur, and may depending on the facts and the terms of the contract with the relevant contractor, supplier or other business partner, terminate or suspend the relationship or otherwise cease, reduce or minimise business

contact with the relevant contractor, supplier or other business partners.

**7. How does the reporting entity assess the effectiveness of these actions**

7.1.1 From time to time, Genpact assesses and reviews the risk of Modern Slavery occurring in any part of its own business and in any of its supply chains. In light of any such risk assessments it may from time to time seek specific reassurances from its contractors, suppliers and other business partners; and seek to carry out due diligence or specific audits either itself or through third parties to satisfy itself that Modern Slavery is not occurring. Genpact's assessments have been 'top-down', based on known information or information that was able to be readily sourced

- a) Genpact considers that the steps it has been taking are effective in ensuring that slavery and human trafficking are not occurring in its operations and/or supply chains. It has to date not identified any incidents that could affect the achievement of its objectives. As part of its plans for the current financial year, it will continue to identify, monitor, evaluate and review the effectiveness of the actions taken and will ensure that its strategy is responsive to any potential risks of Modern Slavery and human trafficking risks.
- b) As a confirmation of Genpact's commitment to leading with integrity and prioritizing ethical business practices, Genpact has been recognized in 2018, 2019, 2021 and 2022 by Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices. The World's Most Ethical Companies® Honoree List is available at

<https://www.worldsmoethicalcompanies.com/honorees/>.

8. **The process of consultation with any entities the reporting entity owns or controls**

Genpact UK Limited – an affiliate of Genpact Australia has been submitting Modern Slavery Statements as required under UK law since 2016. Genpact Australia consults and works closely with Modern Slavery experts in Genpact UK Limited. It also consults with its internal Legal and Compliance, Audit; Vendor Governance, Human Resources, and Sourcing teams.

This statement applies to the financial year ended 31 December 2022. This statement was approved by the Board of Directors of Genpact Australia Pty Limited on 22 December 2022.



Richard Morgan (Director)

Genpact Australia Pty Limited



Joanne Bamforth (Director)

Genpact Australia Pty Limited