



Cognizant Technology Solutions Australia Group - Modern Slavery Statement 2021

This statement is provided as a joint statement pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) by Cognizant Technology Solutions Australia Pty Ltd (ACN 100 749 997) on behalf of itself and its reporting subsidiaries, SVN BidCo Pty Ltd (ACN 626 029 007) and SVN HoldCo Pty Ltd (ACN 626 028 037) (together, **CTS Australia, we, our, or the reporting entities**).

The statement outlines the actions which CTS Australia took to address modern slavery risks in our business and supply chain for the US financial year ending **31 December 2021**.

Introduction

CTS Australia is part of Cognizant, one of the world's leading digital technology and professional services businesses.

Cognizant is headquartered in New Jersey (USA) and has approximately 330,000 employees worldwide (as of 31 December 2021).

This is the second statement provided by CTS Australia under the Australian modern slavery reporting regime.

Cognizant Worldwide Limited (**Cognizant** or **CWW**), a company registered in the United Kingdom, has provided five statements to date under the *Modern Slavery Act 2015* (UK).

Cognizant is committed to corporate social responsibility and believes in acting ethically throughout our business. This ethos is underpinned by our core values and driven by our Global Chief People Officer and local People & Culture team. Environmental, Social and Governance (**ESG**) issues impact all of us at Cognizant. That is why we act through rigorous cross-functional governance, driven by committed leadership. We have made new commitments and created new policies and processes as part of our increased focus on ESG. In 2020, Cognizant proudly invested in diverse and dedicated leaders to drive our integrated ESG management approach and deliver tangible results. We hired a Chief Sustainability Officer in 2020 and further expanded the ESG team in 2021.

The [Cognizant ESG Report](#) is published annually and includes information about new commitments, policies, and processes.

As part of our ongoing ESG development efforts, we are also considering ESG in our supply chain in new ways. In 2021, we conducted an ESG supply chain prioritization exercise, developed in consultation with independent external human rights experts, known as Article One, to identify potential ESG supplier risks, including working conditions, and established a three-year implementation roadmap for managing risks.

Cognizant opposes all forms of slavery, human trafficking and forced labour in its operations and the operations of its suppliers. Cognizant's management of modern slavery risks falls within its overall approach to protecting human rights and equal opportunity and upholding business ethics.

As we explain below, given the nature of the industry in which we operate, and our risk assessment of modern slavery practices emerging in our operations and supply chain, Cognizant's focus has been ensuring that its standards and expectations are clearly communicated to existing and prospective suppliers.

Structure, operations, and supply chain

Cognizant Technology Solutions Australia Pty Ltd was registered in May 2002 and commenced active operations in 2006 as part of Cognizant's broader expansion into the Asia-Pacific region.

CTS Australia have offices in Melbourne, Sydney, Brisbane, Perth and other locations throughout Australia and New Zealand, however, many of our employees are client-based. CTS Australia's office locations form part of a much larger regional footprint which includes numerous regional offices and delivery centres.

As of 31 December 2021, CTS Australia has approximately 2,000 employees based across Australia and New Zealand. Most of the workforce consists of highly trained associates with software engineering, programming, and other IT skills.

Cognizant Technology Solutions Australia Pty Ltd is a wholly owned subsidiary of Cognizant Technology Solutions AG, a company registered in Switzerland.

The ultimate parent entity of all Cognizant entities globally is Cognizant Technology Solutions Corporation (**CTS Corp**), a company listed and registered in the USA.

As of 31 December 2021, Cognizant Technology Solutions Australia Pty Ltd owns and/or controls several entities which it has established or acquired over recent years. This includes the following reporting entities (which were acquired in 2021, and are covered under this joint statement):

- SVN BidCo Pty Ltd, which is 100% owned by SVN Holdco Pty Ltd; and
- SVN HoldCo Pty Ltd, which is 100% owned by Cognizant Technology Solutions Australia Pty Ltd.

Further, as CTS Australia (including the other reporting entities) own and or control various other subsidiary entities, whilst those other entities may not be reporting entities for the purpose of the Act, this statement is provided on a consolidated basis for the CTS Australia group of companies.

CWW is the primary contracting entity for Cognizant's global business, however, CTS Australia, and its respective subsidiaries, at times enter into contractual arrangements with local clients and suppliers.

Although CTS Australia has a large workforce of its own, it often utilises the services of other Related Body Corporates and/or affiliates forming part of its corporate group from around the globe, in particular the Offshore Delivery Centres (**ODCs**) in India, Malaysia, Singapore, and the Philippines.

ODCs are an essential part of CTS Australia's supply chain. They allow us to provide cost effective services, access to global talent and capability, as well as 24/7 worldwide support to clients regardless of geographic location.

Modern Slavery risks in operations and supply chains

Cognizant is fundamentally a "people business". We do not manufacture any products, nor do we usually directly procure products for clients. An exception to this is, from time to time, CTS Australia may enter into software resale agreements for clients. In our view, such arrangements do not have a material effect on the level of our exposure to the risk of modern slavery.

CTS Australia's operations are largely confined to Australia. Where a client requires services to be provided offshore, these activities are generally carried out by other entities in the Cognizant corporate group rather than being performed directly or contracted out. Cognizant's global network of offices and ODCs are a key point of difference in the market.

CTS Australia's supply chain is made up of approximately 481 contracted suppliers across 15 countries.

Our supply chain relationships include, but are not limited to, suppliers of the following goods and services: property services (e.g., concierge and facilities management), recruitment, cleaning, catering, events, security, office supplies, legal representation, and printing.

Since IT consulting and professional services is a highly competitive industry, we need to attract and retain top talent while building a diverse, inclusive workforce that delivers exceptional client service. In other words, there are strong, ongoing commercial imperatives and operational requirements to provide market leading terms and conditions of employment.

We consider that the nature of the industry in which we operate means the risk of modern slavery being used within our service delivery and supply chain is lower than in some other industries. Nonetheless, procedures for ensuring that we do not engage or condone suppliers who engage in modern slavery are in place and continue to develop.

The risk of exposure to modern slavery practices is higher in relation to ODCs compared to CTS Australia's direct operations and onshore supply chain. This is a product of Australia's high level of legal protections and regulatory enforcement mechanisms relative to other countries in the Asia-Pacific region. India and the Philippines are identified as higher-risk countries under the OECD Guidelines for Multinational Enterprises and the Modern Slavery Index published by the Walk Free Foundation.

Baseline audits have occurred with regards to Cognizant's high-risk industries such as purchase of office consumables, cleaning and security services and labour hire. Generally, the greatest risk of potential exposure to modern slavery practices arises through the purchase of office consumables (e.g., food and stationery), cleaning and security services arranged by building owners or facility managers of premises occupied by CTS Australia and outsourced printing.

Actions taken to address modern slavery risks

Cognizant has taken several steps to mitigate the risk of modern slavery practices and to continue a culture of continuous improvement within CTS Australia and other companies forming part of its corporate group.

Cognizant extends its commitment to address modern slavery to how the company thinks about its supply chain. Our supply chain management policies include:

- Our [Supplier Diversity Policy](#) sets out Cognizant's commitment to working with historically underrepresented and diverse businesses such as minority-, women-, disabled-, LGBTQ+-, or veteran- owned companies. By cultivating an array of relationships, we provide business opportunities to various enterprises, while enabling our long-term success. We seek to verify supplier self-declarations from third party certified diversity supplier databases, and we use third party sources to identify diverse suppliers and related spend in the United States.
- Our [Supplier Standards of Conduct](#) set out the principles by which all of Cognizant's third party representatives, suppliers, vendors and subcontractors and their parent, subsidiary, and affiliated entities are expected to abide by (see *Supplier Standards of Conduct* section below for further details).
- Our [Human Rights Policy](#) outlines our commitment to respect the basic principles of human rights and sets the expectation that our suppliers, business partners, and clients adopt similar policies within their own businesses. The principles addressing child labor and forced labour are:
 - *End human trafficking. Never engage in trafficking in persons, which includes but is not limited to the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labour of any form. We are all responsible for proactively reporting human trafficking to the appropriate authorities. If you know or suspect that human trafficking is occurring/has occurred in any parts of our business or supply chains of any supplier, promptly inform your manager, local HR Manager, or the Ethics & Compliance Helpline.*

- *Consider our supply chain. Cognizant has zero tolerance for human rights abuses in the supply chain. Our Supplier Standards of Conduct prohibit and address human rights abuses and are embedded into every vendor contract throughout our supply chain.*

Supplier set-up form

We have updated our supplier onboarding process to include targeted modern slavery due diligence within our supply chain. We have continued to invest in our procurement processes and during 2019 implemented Ariba - an automated supplier onboarding system - globally.

When Cognizant approaches new suppliers they are required to respond to a questionnaire about their own practices and their supply chain in relation to modern slavery. During 2021, suppliers who provided goods or services considered to be high risk (such as recruitment agencies, hospitality event providers, marketing and promotional material providers, construction, and facilities management), were required to upload their policy and process to comply with modern slavery legislative requirements and respond to a modern slavery questionnaire as part of their onboarding. The questionnaire includes questions such as whether the suppliers have taken any steps to eliminate acts of modern slavery from their own organisations and supply chain. Suppliers are required to provide evidence that they have implemented modern slavery prevention mechanisms. Suppliers who do not submit sufficient documentation of their policies and procedures to address modern slavery are prevented from doing business with Cognizant.

The questionnaire process was made standard practice across the US, Europe, APAC, and India in 2020, and then rolled-out to all Cognizant entities globally. Information gathered via the supplier set-up form is entered into a central database, which is designed to enhance corporate knowledge and encourage honest, two-way engagement between parties.

Furthermore, CTS Australia has implemented contractual obligations as a part of onboarding which requires specific warranties and compliance commitments from its suppliers pertaining to modern slavery compliance and controls.

We continue to broaden and deepen the questionnaire and diligence process, and have committed to substantive actions for the upcoming year, detailed in our [2021 ESG Report \(Report\)](#). The Report shows that Cognizant conducted an ESG supply chain assessment in 2021. As a result of that assessment, which consisted of internal interviews and external benchmarking, we mapped a rolling implementation of integrated policies, due diligence, transparency, and continuous improvement, which are designed to propel our efforts from a baseline, to a strategic, to – ultimately – a leadership position.

Global Human Rights Policy

In December 2020, Cognizant adopted a global [Human Rights Policy \(Human Rights Policy\)](#). The Human Rights Policy seeks to affirm Cognizant's commitment to human rights globally, and to ensure that we are not directly, or indirectly complicit in human rights abuses, focusing on:

- ending human trafficking
- maintaining a safe and health workplace
- considering our supply chain
- maintaining the respect of freedom of association
- ensuring fair and merit-based employment decisions
- treating others with dignity and respect
- competing ethically

The Human Rights Policy reflects a zero-tolerance approach to human rights violations (including modern slavery) and reinforces Cognizant's commitment to following ethical practices in its business dealings and relationships.

The Board of Directors of CTS Corporation has overall responsibility for overseeing compliance with the Human Rights Policy. Responsibility for managing day-to-day compliance rests with the Chief People Officer in conjunction with the Chief Compliance Officer and Chief Sustainability Officer (Global Head of Environmental Social Governance).

Amongst other things, the Human Rights Policy stipulates that: *“If you are aware of a violation of this policy, you have an obligation to report it to the Company. As stated in Cognizant’s Whistleblower and Non-Retaliation Policy, Cognizant does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law, the Code of Ethics, or other Cognizant policies.”*

The launch of the Human Rights Policy was accompanied by a training and awareness campaign to all Cognizant associates around the globe.

Core Values and Code of Ethics

In February 2021, we updated our [Code of Ethics \(Code\)](#) to reaffirm our core values and emphasize the standards of conduct that we expect from managers and associates to ensure that they are aligned to the Cognizant agenda.

The Code is important because it instills trust and confidence in the minds of our clients, shareholders, partners, and associates and supports our empowered ‘client-first’ culture. Our employees (known within Cognizant as “Associates”) and other stakeholders are encouraged to report concerns proactively.

Cognizant’s goal is to engineer modern businesses to improve everyday life. This is our purpose, and how we do it matters more now than ever. We do this based on four (4) key principles:

1. We earn trust by continually striving to be a trusted business partner and corporate citizen. In pursuing this goal, we must consistently incorporate ethical standards into our day-to-day business activities.
2. We do the right thing, the right way. Our clients, shareholders and communities depend on our commitment to perform with the highest level of integrity.
3. We respect people and the environment. Cognizant is committed to a safe and healthy work environment.
4. We live up to our responsibilities. Our commitment to doing business ethically includes respecting privacy, protecting information, and safeguarding assets.

Australia Whistleblower Policy

In April of 2020, CTS Australia implemented an Australia specific ‘Whistleblower & Non-Retaliation Policy’ (**WB Policy**) in response to amendments to the *Corporations Act 2001* (Cth) (**Corporations Act**).

The WB Policy is based on the global Whistleblower & Non-Retaliation Policy which applies to Cognizant’s worldwide operations (**Global WB Policy**). Reports and disclosures which (a) do not qualify for protection under this WB Policy or (b) are about legal and ethical issues relating to Cognizant business operations not involving CTS Australia, are handled in accordance with the Global WB Policy.

At Cognizant, we promote a speak-up culture that depends on our associates raising questions or concerns so that appropriate action can be taken. Reports of suspected improper or unethical activity are investigated and treated confidentially to the maximum extent possible and in accordance with the Corporations Act. Reports and disclosures can be made anonymously.

The WB Policy outlines extensively the reporting avenues available to disclosers, the associated protections and seeks to ensure fair treatment for individuals.

The WB Policy is notified to the workforce, with mandatory training provided to frontline leaders, and made available to all associates in CTS Australia (including in 2021 and 2022).

Compliance Hotline

Cognizant maintains a [Compliance Hotline](#) through which associates, customers, vendors and others can anonymously communicate concerns about potentially unethical behaviour.

The hotline is staffed by an independent third-party provider (**AT&T**) and is available by phone or online. Reports are investigated by expert independent investigators that are engaged by AT&T.

Supplier Standards of Conduct

In 2021, Cognizant updated our [Supplier Standards of Conduct](#) (**Supplier Standards**) to formalise our expectations and requirements in terms of ethical business conduct.

The Supplier Standards apply to all of Cognizant's third-party representatives, suppliers, vendors, and subcontractors (and their parent, subsidiary, and affiliated entities).

All suppliers are required to review and confirm their understanding of our Core Values and Code of Ethics, our Anti-Corruption Statement, and our Human Rights Policy.

The Supplier Standards list several specific requirements. Those related to addressing child labour and forced labour include:

- **Compliance with laws:** Suppliers must operate in full compliance with all applicable laws and regulations of the country and locale in which the supplier operates.
- **Prohibition on child labour:** Cognizant strictly prohibits the use of child labour in any of the supplier's operations. Suppliers must not employ workers younger than the greater of (a) 15 years of age, or 14 years of age where the local law allows such exception consistent with International Labor Organization guidelines, or (b) the age for completing compulsory education, or (c) the minimum age established by law in the country of manufacture. In addition, suppliers must comply with all legal requirements for authorised young workers, particularly those pertaining to hours of work, wages, and working conditions.
- **Prohibition on forced labour:** All forms of forced or compulsory labour, such as prison labour, bonded labour, or indentured labour, are forbidden in any operations. Forced overtime and human trafficking are also strictly prohibited. Additionally, Cognizant expects Suppliers to follow responsible recruitment practices to prevent forced labor and other forms of modern slavery. Suppliers and their labor agents and subagents shall not hold, destroy, conceal, confiscate, or deny workers access to their identity or immigration documents.
- **Commitment to health and safety:** Suppliers must provide clean, safe, and healthy working conditions for all employees. Suppliers must comply with all applicable, legally mandated standards for workplace health and safety in the countries in which they operate, and Cognizant encourages suppliers to implement industry best practices.
- **Fair wages and benefits:** Suppliers must pay workers according to any applicable minimum wage, as well as any legally mandated overtime premium for all hours worked. Suppliers also must ensure that any legally mandated benefits are being provided to their employees and that there are no illegal deductions for employee benefits. Workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Suppliers shall also take steps to ensure equal pay for equal work and that remuneration for work of equal value is established without discrimination.

- **Working Hours.** Working hours are not to exceed the maximum set by local law. Furthermore, a standard work week should not exceed 48 hours or 60 hours, including overtime, except in emergency or unusual situations. All overtime must be voluntary, and workers must be allowed at least one day off every seven days.
- **Use of Subcontractors.** Cognizant generally prohibits Suppliers from using subcontractors in performing their work for Cognizant unless Cognizant gives prior written approval, and then only after the Supplier acknowledges that it has provided the subcontractor a copy of this document.
- **Freedom of Association and Collective Bargaining.** Suppliers must respect the right of all workers to form and join, or not join, a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) and to bargain collectively. Suppliers will prohibit any form of intimidation, harassment, retaliation, and violence against workers exercising these rights.
- **Commitment to Responsible Sourcing.** Suppliers will be committed to sourcing goods and services for Cognizant in alignment with all the principles and standards laid out in Cognizant's Supplier Standards of Conduct. Suppliers should give exceptional emphasis to sourcing with the same fundamental support of human rights, labor, health and safety, environment and ethics as set forth in these Supplier Standards. This commitment also applies to the responsible sourcing of minerals, including conflict minerals. Suppliers must take steps to determine if their products contain conflict minerals (including tin, tantalum, gold, and tungsten) and, if so, implement supply chain processes to identify the sources of these minerals and support efforts to eradicate the use of conflict minerals, which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

The Supplier Standards allow Cognizant to conduct announced or unannounced on-site inspections for the purpose of monitoring compliance and inspecting documentation.

The Supplier Standards also provide for mandatory reporting of violations. Specifically, any suppliers who become aware of any actual or potential violation of the Supplier Standards (or other relevant policies and laws) are required to report them to the Cognizant compliance hotline as soon as practicable.

Training and communication

As part of our hiring processes, all new employees hired into Cognizant are required to undergo mandatory training in relation to Cognizant's Code of Ethics and Core Values. A mandatory refresher is undertaken annually by all employees. Such training is an annual requirement for all staff.

In addition to this, we have built a specific reference to this subject into our corporate induction program and included a module on modern slavery in our in-house people manager training courses.

United Nations Global Compact

In February 2021, Cognizant joined the United Nations Global Compact (**UNGC**), a worldwide network of more than 9,500 companies and 30,000 non-business participants who are committed to building a sustainable future. In October 2021, we deepened our commitment by [joining the United Nations Global Compact India \(UNGCI\)](#), a country-level leadership platform for strengthening sustainable business practices.

By signing the UNGC, Cognizant has committed to integrating UNGC's Principles into Cognizant's strategy, day-to-day operations, and organisational culture. These principles focus on supporting the protection of human rights, promoting greater environmental responsibility, and working against corruption in all forms.

In keeping with these principles, we will be adopting additional ESG goals for our company and reporting regularly on our progress toward their achievement. Our ESG-focused intent is also reflected in Cognizant becoming a founding member of the World Economic Forum's newly launched Partnering for Racial Justice in Business initiative. This coalition of organisations is committed to building equitable and just workplaces for professionals with under-represented racial and ethnic identities.

Assessment and Monitoring

The risk of modern slavery occurring in CTS Australia's organisation and supply chain is managed in accordance with Cognizant's global compliance framework. The Global Compliance team (based in the USA) is responsible for monitoring and investigating any suspected unethical behaviour including modern slavery.

The Global Compliance team reports directly to the Board of Directors of CTS Corporation and provides regular updates on the outcome of investigations and inquiries relating to a range of ethical issues. CTS Australia has access to Cognizant's significant dedicated internal compliance capabilities and resources. Specifically, Cognizant employs a General Counsel, Chief Compliance Officer and Chief Security Officer. These individuals and their staff serve to ensure that our operations follow all internal policies and external laws and regulations.

The Global Compliance team is responsible for providing oversight with respect to modern slavery risks on behalf of the Board of Directors of CTS Australia and Cognizant generally. Several committees and subcommittees support the Board of Directors of CTS Corporation. The Audit Committee is responsible for review and evaluation of the company's enterprise risk management and management of third parties and contractual risks.

Cognizant measures its performance and assesses the effectiveness of the control measures outlined above via regular meetings of the senior leadership team and staff pulse surveys. The most recent staff pulse survey was conducted in June 2021 and indicated a high level of staff confidence in Cognizant's performance in terms of respecting human rights and equal opportunity.

At the time of preparing this statement, CTS Australia has not been charged or convicted of any criminal offences relating to modern slavery or slavery-like practices. We are not aware of any current or previous issues relating to slavery or human trafficking within CTS Australia's operations and supply chain. As such, we have not had to initiate any remediation action to rectify the effects of any modern slavery practices in our operations or supply chains.

Consultation

As stated above, CTS Australia owns or controls several entities. Further, this statement is provided as a joint statement for the reporting entities identified herein. We confirm that subsidiary entities were consulted while preparing CTS Australia's original modern slavery statement (for entities present at such time), and this statement. The consultation process has included the following specific steps and project milestones:

- In preparing the initial statement:
 - CTS Australia's Chief Executive Officer and Managing Director sent an email to contact persons at our subsidiaries advising that we were in the process of preparing the statement and foreshadowing a meeting to gather relevant information.
 - Members of CTS Australia's Legal, People & Culture and Compliance teams convened a teleconference with representatives from each entity. The purpose of the teleconference was to confirm audit findings and information, increase awareness of modern slavery risks and validate pre-existing understandings and assumptions with respect to supply chains in our subsidiaries.
 - CTS Australia personnel liaised with subsidiary entities via phone and follow-up emails.
- In preparing this second statement:

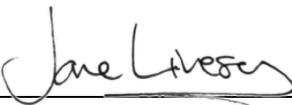
- In 2021, consultation with acquired entities confirmed that such entities had no allegations or findings of modern slavery and were not in critical risk categories, having regard to their service offerings, operations, and supply chains (all being fundamentally a “people business” akin to Cognizant).
- Personnel supporting CTS AU and its subsidiaries’ (including reporting entities) core functions and activities related to modern slavery compliance were involved in preparing this statement: including Procurement, Human Resources, Legal, Ethics and ESG teams. The support of such functions and personnel is largely centralised (or has centralised management) across our Australia operations. This enables the views contained in this statement to reflect the operations, actions and data related to CTS AU and each of its relevant subsidiaries, including the reporting entities for the purposes of the joint statement.
- In May 2022, a detailed training session on modern slavery took place across leadership and senior personnel of CTS AU and its subsidiaries, as a reminder of the relevant ethical and legal frameworks, and the policies and procedures underlying CTS AU’s compliance.
- The Board of Directors of each of the reporting entities has endorsed this statement.

Based on the consultations outlined above, CTS Australia believes that the risk of exposure to modern slavery practices occurring in the operations or supply chain of its ‘owned or controlled entities’, including the reporting entities, is not materially different to Cognizant Technology Solutions Australia Pty Ltd’s own risk profile.

Other relevant information

The Top Employer Institute certified Cognizant Technology Solutions Australia Pty Ltd in both 2020 and 2021 as a Top Employer for Excellence in Workforce Planning, Talent Strategy, Leadership Development and Career and Succession Management. As of 2022, Cognizant Technology Solutions Australia Pty Ltd is accredited as a Great Place to Work, through the Great Place to Work Institute.

Approved by principal governing body and responsible persons



Jane Livesey

Chief Executive Officer Cognizant Technology Solutions Australia Pty Ltd, SVN HoldCo Pty Ltd and SVN Bidco Pty Ltd



Subhadip Sarkar (Jun 29, 2022 14:43 GMT+5.5)

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Director and Vice President, Legal Operations, Intellectual Property & Government Affairs
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