

WRITTEN RESOLUTION IN LIEU OF MEETING OF THE BOARD OF DIRECTORS OF
HCL AUSTRALIA SERVICES PTY. LIMITED

The undersigned, being all the members of the Board of HCL Australia Services Pty. Limited (“the Company”), hereby consent to and adopt in all respects the following resolution and the resolution adopted pursuant to such written consent shall have the same force and effect as if adopted at a meeting duly noticed and held.

APPROVAL FOR MODERN SLAVERY STATEMENT

In terms of s. 16 of the Modern Slavery Act 2018 (Cth) (referred to as “MSA”) applicable to entities based, or operating, in Australia, which have an annual consolidated revenue of more than AUD 100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to address those risks. The said statement is required to be approved by the Board of Directors of respective entity and is also required to be published on the website of Company.

As the Company has a turnover of AUD 606.59 million during the financial year ended March 31, 2022, there is a need to ensure the compliance of MSA.

The Modern Slavery statement for financial year ending March 31, 2022 is enclosed herewith for review and approval by the Board.



Modern Slavery
Statement_FY22.doc

The following resolutions are proposed for the consideration:

“**RESOLVED THAT** the Modern Slavery Statement for financial year ending on March 31, 2022 prepared in compliance with s. 16 of the Modern Slavery Act 2018 (Cth) of Australia be and is hereby approved by the Board.”

“**RESOLVED FURTHER THAT** any Director of the Company be and is hereby authorised to sign the Modern Slavery Statement on behalf of the Company and to do all necessary acts, deeds and things as may be necessary in this regard.”

The undersigned have executed this written consent effective as of 1st day of March 2023.

Prateek Aggarwal
Director

Glenn Thomas Merchant
Director

Sundaram Sridharan
Director

HCL AUSTRALIA SERVICES PTY LTD

MODERN SLAVERY STATEMENT

This is the joint statement of HCL Australia Services Pty Ltd ABN 72 081 196 983 (“HCLTech Australia”) and DWS Pty Ltd ABN 83 085 656 088 under section 14 of the *Modern Slavery Act 2018* (Cth) (“MSA”) to describing the steps taken in response to matters set out in section 16 of the MSA for the reporting period from 1 April 2021 to 31 March 2022.

ORGANISATION’S STRUCTURE AND OPERATIONS

HCLTech Australia is a subsidiary of HCL Technologies Ltd (“HCLTech”) and is the trading entity of HCLTech operating in Australia, as a private company limited by shares. HCLTech is a next-generation global technology company that helps enterprises reimagine their businesses for the digital age. Our technology products and services are built on four decades of innovation, with a world-renowned management philosophy, a strong culture of invention and risk-taking, and a relentless focus on customer relationships. HCLTech takes pride in its diversity, social responsibility, sustainability, and education initiatives. Through its worldwide network of R&D facilities and co-innovation labs and global delivery capabilities, HCLTech delivers holistic services across industry verticals to leading enterprises, with approximately 10,000 clients using our software and products. HCLTech has a worldwide network of research and development facilities and delivery centres. HCLTech and its various subsidiaries together employ over 220,000 staff across 60 countries.

HCLTech Australia supplies technology products and services to financial enterprises, supermarket chains, telecommunications companies, Australian city councils, top four banks and top retailers. HCLTech Australia does not engage in financial lending and nor does it hold any investments.

HCLTech Australia has offices in Adelaide, Brisbane, Canberra, Melbourne, Perth and Sydney, and its registered office is in Sydney, NSW. HCLTech Australia together with DWS Pty Ltd employ more than 2,200 staff with 93% full time employees. 70% of the overall workforce is made up of Australian or New Zealand residents or citizens.

HCLTech Australia did not own or control any entities in reporting period 1 (1st April 2019 to 31st March 2020). In reporting period 2 (1st April 2020 to 31st March 2021), HCLTech Australia acquired subsidiaries and the current list of subsidiaries owned or controlled by HCLTech Australia is as follows:

1. DWS Pty Ltd;
 - a. Phoenix IT & T Consulting Pty Ltd;
 - b. Wallis Nominees (Computing) Pty Ltd;
 - c. DWS (NSW) Pty Ltd;
 - d. Symplicit Pty Ltd;
 - e. Projects Assured Pty Ltd.
 - f. DWS Product Solutions Pty Ltd;
 - g. Graeme V Jones & Associates Pty Ltd;
 - h. Strategic Data Management Pty Ltd;
 - i. SDM Sales Pty Ltd;

DWS Pty Ltd owns each of the entities listed above at 1(a) - (i) and is also a reporting entity under the MSA. DWS Pty Ltd was established in 1991 and is a leading Australian IT, Business and Management Consulting Services Group conducting operations in the space of Technology Design and Delivery; Program and Project Management; Automation and Intelligence; Experience Design CX and UX; Digital Transformation; Strategy and Business Improvement; Data and Analytics; Cloud Services; and Government Services.

DWS Pty Ltd's head office is located in Melbourne employing more than 700 staff with offices in Melbourne, Sydney, Adelaide, Brisbane, Canberra and Wellington, providing services to a broad range of blue-chip corporate clients as well as Federal, State and Local Government agencies.

HCLTech Australia and DWS Pty Ltd endeavour to continue to consult as to each of our modern slavery approaches and how we can share ideas and learnings going forward to develop efficiencies across the entities.

OUR SUPPLY CHAINS

HCLTech Australia's operations are supported by a global supply chain for goods and services. Our tier 1 supply chain is made up of a diverse range of technological products and services (including software, hardware, servers & computing, networking, telecommunications, field services, data centres and storage), and business services (including facility management services, cleaning, security services, office stationery supplies, real estate, logistics, recruiting, travel, finance, training and consulting services). HCLTech Australia in the 2021-2022 financial year procured from 210 suppliers. The arrangements with our suppliers vary depending on many factors but are generally stable long-term agreements.

DWS Pty Ltd provides consulting services, not physical products outside of the delivery and maintenance of software and associated business artefacts such as documents and content assets and therefore has limited involvement with manufacturing suppliers. We consider that our supply chains are smaller and more simple than other entities our size, noting we have approximately 380 tier 1 suppliers. Our suppliers include government entities, stationery, catering, equipment, rental properties, real estate services, and software products and services.

MODERN SLAVERY RISKS

HCLTech Australia and DWS Pty Ltd understand that every entity can potentially cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.

Operations

Of HCLTech Australia and DWS Pty Ltd's over 2,200 employees 30% are non-local labour and are on visas. We acknowledge that this cohort is at a higher risk of modern slavery given their ability to reside in Australia is tied to their work and therefore they are more vulnerable to exploitation. Both entities are careful to ensure that these workers are provided with clear employment contracts outlining the workers' rights and that those workers are treated in line with all applicable local workplace laws.

All of HCLTech Australia's staff may work overtime at some point in response to the needs of the business. Some of HCLTech Australia's Information and Technology ("IT") and IT support workers work on night-shifts. Some IT support workers also operate out of remote mine sites given some of our customers are based in those locations. When those site visits occur our IT support staff may on occasion be exposed to dangerous machinery or materials. HCLTech Australia recognises that overtime, night-time work and work on remote or potentially hazardous sites can reduce the oversight a company has over its workers and therefore raises greater risks of modern slavery. HCLTech also utilises recruitment agencies to source staff, and on occasion outsources for temporary labour and recognises the reduction in oversight that can result from doing so.

Like HCL Tech, DWS Pty Ltd considers that people are at the heart of our business. Almost all employees are employed on a permanent full-time basis, with a very small number of contract arrangements for specialised capabilities. We have a rigorous recruitment process that validates and confirms all relevant working rights for our employees, together with background checks where relevant. We also maintain Labour Hire Licences in all relevant Australian States (presently being Victoria, Queensland and the ACT). DWS employees largely work on our client's premises, utilising client infrastructure, processes and assets. We acknowledge that the off-site nature of this work may lead to reduced oversight and we detail below the various steps we have taken to mitigate

those risks.

For both entities our operations, and those of the entities we own or control, are largely within the IT and IT enabled services industries. These are recognised as high-risk industries globally. The products and services that HCLTech Australia supplies are high risk including IT services as well as IT hardware assets such as PCs, servers, data storage, data centre networks, backups, operating systems, onsite server rooms and other IT hardware components. The products and services that form part of our both entities' operations include cleaning, security, telecommunications, and other areas that may pose high risks. HCLTech Australia's operations are entirely based in Australia and DWS Pty Ltd's operations are based in Australia and New Zealand, which are low risk geographic locations. HCLTech undertakes business in approximately 60 different countries but we deal in each particular country through our local entity. HCLTech Australia deals with all Australian businesses.

Supply Chains

HCLTech Australia's supply chains are diverse and global. HCLTech has a centralised procurement department with teams located at different geographic locations (primarily in India, America and Europe). The procurement department's leaders are located in India. DWS Pty Ltd has a more localised supply chain.

Neither HCLTech Australia nor DWS Pty Ltd are directly involved in manufacturing and do not directly procure the high-risk goods that are often part of IT goods such as cobalt for batteries, diamonds, gems, silver, copper, gold and rubber. Both entities do, however, utilise IT hardware and so we acknowledge that these kinds of high-risk goods may be present further down in our supply chains. HCLTech Australia and DWS Pty Ltd provide coffee and tea for our staff, and we have furniture, carpets and stationery in our offices. We recognise these goods have all been identified as presenting high risks of modern slavery.

Both entities understand that different geographic locations present higher risks of modern slavery. HCLTech Australia sources our goods and services from many different suppliers who are located all over the globe. Of HCLTech Australia's 210 suppliers, we are aware that a significant portion are based in Australia and we are in the process of mapping our supply chains in more detail. DWS Pty Ltd has collated a list of its 380 suppliers and endeavours to make further enquiries in future reporting periods.

To the best of our knowledge, neither entity is aware of any recent human rights violations by any of our suppliers.

ACTIONS AND EFFECTIVENESS

HCLTech Australia is committed to making significant and long-lasting improvements to workers' employment, workplace conditions, systems and processes related to its operations.

DWS Pty Ltd was built upon the values of Integrity, Honest and Transparency and they underpin the business to this day. DWS Pty Ltd is committed to combatting modern slavery and has incorporated appropriate governance and measures throughout operations and supply chains to ensure we are playing a part in the elimination of modern slavery.

In the recent reporting period HCLTech Australia has prepared in draft form two key documents to further its approach to identifying, assessing and addressing modern slavery risks including an internal facing modern slavery policy ('The Policy') and a supplier code of conduct ('The Code').

The Policy will be applicable to all staff and outline our expectations of staff and commitment to identify, assess, address and report on the risks of modern slavery within our operations and supply chains. The Policy details the various relevant pieces of legislation and guiding materials that we expect our staff to be familiar with. The Policy also educates staff on our risk assessment and due

diligence processes in this area and from a remedial perspective outlines the ramification of breaches of The Policy and reporting avenues.

The Code is intended to be rolled out to suppliers and assists in our due diligence and remedial powers in the event that actual instances of modern slavery are discovered in our supply chains. The Code clearly articulates the standards of practice we expect of our suppliers and details our commitments to combating modern slavery. The Code details the various relevant pieces of legislation and guiding materials that we expect our suppliers to be familiar with, and the processes we expect our suppliers to have in place.

HCLTech Australia and DWS Pty Ltd have also begun to train staff in the area of modern slavery. We have engaged external experts to undertake a tailored interactive workshop with key internal stakeholders as well as representatives of our subsidiaries for consultative purposes educating personnel on the nature and prevalence of modern slavery, the potential risk areas for our operations and supply chains, our legal obligations, and mapping out the next steps in assessing and addressing our risks.

HCLTech also has in place a Human Rights Policy (HR Policy). The HR Policy provides for our broader commitment to ensure that people are treated with dignity and respect and to identify, prevent and mitigate human rights violations resulting from, or caused by, our business activities. Applicable to all employees of HCLTech and its subsidiaries worldwide, the HR Policy refers to internationally recognised human rights as set out in the *International Bill of Human Rights* and the *International Labour Organisation's Declaration on Fundamental Principles and Rights at Work*. The HR Policy accounts for topics such as diversity, discrimination, harassment, freedom of association, health and safety, anti-bribery and anti-corruption, child labour, bonded labour, human slavery and human trafficking and provides for avenues to raise concerns.

The principle of Trust through Transparency and Accountability is at the core of HCLTech's existence, as enshrined within HCLTech's Code of Business Ethics and Conduct (COBEC). All policies, practices, processes, and business dealings at HCLTech are governed by COBEC. COBEC covers all directors, employees, third party vendors, consultants and customers across the world. COBEC details HCLTech's core values: to uphold the dignity of the individual; to honour all commitments; commitment to quality, innovation and growth in every endeavour; and to be responsible corporate citizens.

COBEC provides for transparency, compliance with relevant laws, ethical conduct, an equal opportunity workplace, protection of the Company's property and information, and merit-based recruitment. It provides for HCLTech's strong, clear and documented stance against any form of harassment in the workplace, as well as protection of each employee's privacy. COBEC provides for HCLTech's open door policy which encourages its employees to bring up issues of infringement or violation of COBEC fearlessly, for example any modern slavery reporting. Furthermore, employee contracts require staff to report any wrongdoings during their period of employment.

COBEC also speaks to HCLTech's relationships with its suppliers providing that they are based on lawful, efficient and fair practices and that we expect our suppliers to obey the local laws that require them to treat employees fairly, provide a safe and healthy work environment and protect the quality of the environment.

Employees are directed to Human Resources Management, General Counsel, Senior Finance Personnel, or HCLTech's Officer overseeing anti-bribery if they have any questions regarding COBEC compliance. Individuals can report any violation of COBEC without fear of retribution verbally or in writing, which HCLTech acknowledges is particularly important for reporting on modern slavery, via HCLTech's Whistleblower Policy. Each employee is required to take mandatory COBEC training within twenty (20) days of joining HCLTech. There is a statement towards the end of COBEC training module that employees are required to sign off on which attests to the fact that they have read and understood the COBEC policy, that they understand there may be additional policies and laws specific to their work areas, and that they agree to comply with both in letter and spirit.

DWS Pty Ltd operates a Quality Management System which is certified under ISO 9001:2015 which has appropriate monitoring and auditing allowing identification of potential areas for improvement and the implementation of any required corrective action. DWS also maintains a set of policies, procedures and guidelines which are refreshed via online mandatory training modules regularly including: a Code of Conduct; Privacy Policy and Responsibilities; Workplace Health and Safety; Corporate Information Security Policy; IT Acceptable Use Policy; Environment Policy; and Business Continuity Plan. Similarly, to HCLTech Australia, DWS Pty Ltd understands that having retribution-free reporting avenues is key in the fight against modern slavery and as such we also maintain Whistleblower Policies and processes. DWS Pty Ltd also maintains a Corporate Risk Register. Senior Management meet on a regular basis to review and reassess severity, potential impacts and the implementation and effectiveness of risk mitigations and corrective actions undertaken.

In relation to suppliers, HCLTech also has a Procurement Policy which sets out the guidelines to be followed by the HCLTech group, including HCLTech Australia, for the purposes of procuring requisite goods and services from vendors across the globe. It is our endeavour to ensure that we meet global standards and follow best practices in business engagements with our vendors.

The Procurement Policy provides that HCLTech evaluates the appropriateness of each supplier prior to onboarding, which may include evaluating their corporate responsibility, sustainability, employee health and safety record, reputation and undertaking reference checks. This allows for HCLTech to undertake due diligence to ensure that we can manage the risks of slavery or human trafficking in our supply chain or in any part of our business. In April 2022, we launched a Vendor Due Diligence program which includes a Vendor Evaluation Form that has questions related to sustainability and modern slavery.

The Procurement Policy also requires that suppliers are evaluated periodically and may be audited to ensure compliance and adherence to contractual obligations. This provides the opportunity to seek out modern slavery related issues and take relevant action in relation to same. The Procurement Policy also allows HCLTech to blacklist suppliers who are suspected of questionable activities, practices, or ethics, such as in relation to modern slavery.

Suppliers are required to make themselves aware of all relevant laws and policies. We currently have clauses within our contracts with suppliers to ensure their awareness and compliance with COBEC, as well as enshrining termination rights upon non-compliance. We also have specific modern slavery related clauses requiring our suppliers to conduct their business consistently with anti-slavery laws and take a number of other steps to minimise the risks of modern slavery appearing in their operations and supply chains. We intend to develop robust training courses with our suppliers in the future also.

DWS Pty Ltd recognises that risks can emerge from any supplier in its downstream supply chain and is committed to appropriate levels of due diligence when onboarding a new supplier to avoid inadvertently contributing towards Modern Slavery risks. We have recently completed an audit of our top suppliers on the basis of spend, and we have reviewed each of their Modern Slavery statements. We will continue to maintain a register with a view to surveying suppliers who do not have a published statement so we may take steps to minimise the possibility of inadvertently contributing towards Modern Slavery risks.

Both entities are committed to furthering efforts to ensure that no slavery or human trafficking take place in our operations or supply chain. We continue to seek the assistance of expert advice in this regard.

CONSULTATION

HCLTech Australia has been in consultation processes with DWS Pty Ltd regarding modern slavery. DWS Pty Ltd has a separate board to HCLTech Australia but the boards consist of multiple common individual directors. In this sense knowledge is shared between the entities and consultation occurs naturally as a result of the governance structures. HCLTech Australia has also commenced

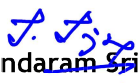
discussions with DWS representatives as to each of our modern slavery approaches and how we can share ideas and learnings going forward to develop efficiencies across the entities. HCLTech Australia invited representatives from DWS Pty Ltd to attend our tailored interactive workshop referenced above so that we could consult on next steps in this space.

APPROVAL

The HCLTech Australia Board of Directors and the DWS Pty Ltd Board of Directors make this joint statement in accordance with section 14 of the MSA. Both entities consider that the Boards of Directors are the relevant principal governing bodies for the purpose of the MSA.

This modern slavery statement was considered and approved by the HCLTech Australia Board of Directors by circular resolution passed on March 1, 2023.

For HCL Australia Services Pty. Limited


Sundaram Sridharan
Director

Responsible Member of HCLTech Australia's Principal Governing Body