

HCL AUSTRALIA SERVICES PTY LTD MODERN SLAVERY STATEMENT

This statement has been prepared by HCL Australia Services Pty Ltd ABN 72 081 196 983 (“HCL Australia”) under section 13 of the *Modern Slavery Act 2018* (Cth) (“MSA”) to describe the steps the Company has taken in response to the matters set out in section 16 of the MSA during the reporting period spanning from 1 April 2020 to 31 March 2021.

ORGANISATION’S STRUCTURE AND OPERATIONS

HCL Australia is a subsidiary of HCL Technologies Ltd (“HCL”) and is the trading entity of HCL operating in Australia, as a private company limited by shares. HCL 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. HCL also takes pride in its many diversity, social responsibility, sustainability, and education initiatives. Through its worldwide network of R&D facilities and co-innovation labs, global delivery capabilities, and over 187,000+ ‘Ideapreneurs’ across 50 countries, HCL delivers holistic services across industry verticals to leading enterprises, including 250 of the Fortune 500 and 650 of the Global 2000. HCL has a worldwide network of research and development facilities and delivery centres. HCL has global delivery capabilities. HCL has over 150,000 staff based across 49 countries.

HCL Australia supplies technology products and services to financial enterprises, supermarket chains, telecommunications companies, Australian city councils, top four banks and top retailers. HCL Australia does not engage in financial lending and has only one financial investment which is being wound up.

HCL Australia has offices in Adelaide, Brisbane, Canberra, Melbourne, Perth and Sydney, and its registered office is in Sydney, NSW. HCL Australia and its subsidiaries employ more than 2,100 staff and 70% of that workforce is made up of Australian or New Zealand residents or citizens. Of that workforce, 98% are full time employees.

HCL Australia previously did not own or control any entities. Recently, HCL Australia acquired the following entities:

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

Together the “New Subsidiaries”.

The New Subsidiaries are in the IT software business. We understand under section 16 of the MSA we are required to report on the risks and actions regarding modern slavery as relevant to the New Subsidiaries. Given we have only recently acquired these entities, we are still in the process of obtaining information regarding the risks of modern slavery presented by the New Subsidiaries and in understanding what action has been completed by the New Subsidiaries in this space. We will endeavour to report in more detail on these matters in future reporting periods.

OUR SUPPLY CHAINS

Our 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 stationary supplies, real estate, logistics, recruiting, travel, finance, training and consulting services). HCL Australia has approximately 1,500 suppliers registered, and in the 2020-2021 financial year procured from 256 of those suppliers.

The arrangements with our suppliers vary depending on many factors but are generally stable long-term agreements.

MODERN SLAVERY RISKS

HCL Australia understands that every entity can potentially cause, contribute to, or be directly linked to modern slavery through its operations and supply chains.

Operations

Of HCL Australia's over 2,100 employees 30% are non-local labour and are on visas. HCL Australia acknowledges 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. HCL Australia is 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 HCL Australia's staff may work overtime at some point in response to the needs of the business. Some of HCL Australia's Information and Technology ("IT") and IT support workers complete work at night-time. 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. HCL 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. HCL 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.

Our operations are largely within the IT and IT enabled services industries. These are recognised as high-risk industries globally. The products and services that we supply 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 serve rooms and other IT hardware components. The products and services that form part of our operations include cleaning, security, telecommunications, and other areas that may pose high risks. HCL Australia's operations are entirely based in Australia, which is a low risk geographic location. HCL undertakes business in approximately 50 different countries but we deal in a particular country through our local entity. HCL Australia deals with all Australian business.

Supply Chains

HCL Australia's supply chains are diverse and global. HCL has a centralised procurements department with teams located at different geographic locations (primarily in India, America and Europe). The procurement department's leaders are located in India.

HCL Australia is not directly involved in manufacturing so does not directly procure the high-risk goods that are often part of IT goods such as cobalt for bat diamonds, gems, silver, copper, gold and rubber.

HCL Australia does, however, utilise IT hardware and so acknowledges that these kinds of high-risk goods may be present further down in our supply chains. HCL Australia provides 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.

We source our goods and services from many different suppliers who are located all over the globe. We understand that different geographic locations present higher risks of modern slavery. Of HCL Australia's 183 suppliers, 50% are based in Australia, 29% are based in other low-risk geographic locations (including New Zealand, Germany, the United Kingdom, France, the United States of America, the Republic of Ireland, Denmark, Switzerland, Luxembourg and Sweden), and 18% are based in high risk locations (including India, Hong Kong, Malaysia, South Africa, Singapore).

To the best of our knowledge we aren't aware of any recent human rights violations by any of our suppliers.

ACTIONS AND EFFECTIVENESS

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

The principle of Trust through Transparency and Accountability is at the core of HCL's existence, as enshrined within HCL's global Code of Business Ethics and Conduct (COBEC). All policies, practices, processes, and business dealings at HCL are governed by COBEC. COBEC covers all directors, employees, third party vendors, consultants and customers across the world. COBEC details HCL'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 HCL'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 HCL'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 HCL'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 HCL'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 HCL acknowledges is particularly important for reporting on modern slavery, via HCL's Whistleblower Policy. Each employee is required to take mandatory COBEC training within twenty (20) days of joining HCL. 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.

In relation to suppliers, HCL also has a Procurement Policy which sets out the guidelines to be followed by the HCL group, including HCL 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 HCL evaluates the appropriateness of each supplier prior to onboarding, which may include evaluating their corporate social responsibility, sustainability, employee health and safety record, reputation and undertaking reference checks. This allows for HCL 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. We have recently launched a Vendor Due Diligence program which includes a Vendor Evaluation Form that has questions related to sustainability and modern slavery. We are still in the process of rolling this program out.

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 HCL 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.

HCL Australia also intends to create modern slavery specific training for its own staff.

HCL Australia is committed to furthering its efforts to ensure that no slavery or human trafficking take place in our operations or supply chain. HCL Australia is seeking expert advice in this regard.

CONSULTATION

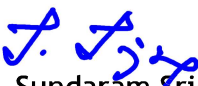
In reporting period 1 HCL Australia did not own or control any subsidiaries and therefore no consultation with other entities was required in order to complete this statement.

As above, we have recently acquired New Subsidiaries. We are still in the process of consulting with these subsidiaries to obtain information regarding the risks of modern slavery presented by the New Subsidiaries and in understanding what action has been completed by the New Subsidiaries in this space. We will endeavour to consult and report in more detail on these matters in future reporting periods.

APPROVAL

The HCL Australia Board of Directors makes this statement in accordance with section 13 of the MSA. HCL Australia considers that its Board of Directors is its principal governing body for the purpose of the MSA. This modern slavery statement was considered and approved by the HCL Australia Board of Directors by circular resolution passed on December 29, 2021.

For HCL Australia Services Pty. Limited


Sundaram Sridharan
Director