



Modern Slavery Statement 2020

ITC Infotech India Limited

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Modern Slavery Statement

1. Introduction

This statement is given to comply with ITC Infotech India Limited’s (“ITC Infotech” or “Company”) reporting obligations under section 13 of the *Modern Slavery Act 2018* (Cth) (the Act) for the calendar year (1st January 2020 to 31st December 2020)

ITC Infotech recognizes the importance of promoting good corporate governance and citizenship in all its operations. The Company’s Code of Conduct emphasizes good corporate citizenship, including recognition of society more broadly as a key stakeholder that must be protected in the operations of the company.

The Code of Conduct explicitly refers to the company’s obligations under the Australia’s *Modern Slavery Act 2015*, which shares similar goals and purposes to the Australian *Modern Slavery Act 2018*. Notably, the explicit reference to the Australia Act within the Code of Conduct highlights ITC Infotech’s recognition of the importance of the risks of modern slavery.

Broadly, ITC Infotech operates programs and policies that:

- Promote good corporate governance and citizenship.
- Promote ethical behavior.
- Encourage healthy working conditions;
- Provide equal opportunities for employees; and
- Discourage and prevent unlawful activity.

2. Overview

2.1 Structure and Operations

ITC Infotech India Limited (ARBN 144 614 924) is a global business solution and technology company. ITC Infotech provides technology solutions and services across a

range of industries, including banking & financial services, healthcare, manufacturing, consumer goods, travel and hospitality.

ITC Infotech India Limited operates in Australia as a registered foreign company and has its registered headquarters in India. ITC Infotech India Limited operates across India, United Arab Emirates and South Africa and Europe with its subsidiaries in Australia and USA. In each of these countries, ITC Infotech works to deliver business solutions to the IT sector.

2.2 Supply Chains

As a business solution and technology provider, the bulk of ITC Infotech's supply chain relates to IT services and suppliers.

ITC Infotech obtains software from reputable third-party suppliers, most substantially from Microsoft and Oracle. Cloud storage services are also obtained from Microsoft. IT hardware used in ITC Infotech's operations is similarly sourced from reputable suppliers including Dell and Cisco.

Each of the suppliers identified above are large, multinational corporations based in the United States. ITC Infotech has considered the risks of modern slavery in these supply chains and has ensured that supplies are sourced only from reputable organizations.

With regards to manpower, it is being done by ITC Infotech from across the world to provide services to ITC Infotech's customers and also for facilities management in compliance with applicable laws. However, there are no major suppliers for this as there are several small ones across the world.

3. Risks of Modern Slavery Practices

ITC Infotech has not identified any areas of potential risks of modern slavery within its supply chains, nor has ITC Infotech initiated any specific program to identify risks of modern slavery within its supply chains. However, as discussed in detail below, employees are instructed to familiarize themselves with materials provided by the Australia Home Office to assist them to better identify risks of modern slavery.

ITC Infotech has suppliers across the world; however, ITC Infotech undertakes appropriate checks on its suppliers. Further, to minimize any risks, ITC Infotech is compliant with all local laws including labour laws and contractually requires that its suppliers be compliant with the applicable laws.

4. Actions taken by ITC Infotech

Due Diligence:

All employees at the time of their joining are made aware of the Code of Conduct and instructed to comply with the same, and any non-compliance would be subject to disciplinary proceedings.

ITC Infotech initiates and ensures appropriate checks while engaging with its suppliers and contracts thereof.

Remediation: For any breaches of Modern Slavery Act, ITC Infotech has the redressal mechanism in place as stated under Clause 5.

4.1 Code of Conduct

As previously noted, ITC Infotech maintains a Code of Conduct to establish and institutionalize a common code of conduct and ethical guidelines to direct and govern the operations of the Company. All employees acknowledge the requirements of the Code of Conduct upon commencement of their employment.

The Code of Conduct advises all employees to familiarize themselves with the requirements of the *Modern Slavery Act 2018* (Australia) and confirms that the Company is compliant with the requirements of that Act.

The Code of Conduct also directs employees to [Modern Slavery Statements Register \(modernslaveryregister.gov.au\)](https://modernslaveryregister.gov.au). Employees are advised to familiarize themselves with the material available from the Australia Home Office at that web address to better understand the risks of modern slavery and how to identify different types of modern slavery. Employees are referred to the Australia's modern slavery helpline phone number.

The Code of Conduct identifies the importance of good employment practices and notes the great importance the company attaches towards good working conditions. ITC Infotech promotes equal opportunity and respectful treatment for all employees. Beyond this, ITC Infotech strictly adheres to and complies with all employment-related laws, including those relating to working hours, wages, welfare and human rights.

ITC Infotech does not accept practices which are unlawful or may be damaging to its image and reputation. Individually, employees are required to uphold ethical standards of integrity and probity. These requirements fundamentally encompass the entire scope of 'modern slavery' as defined under the Act, including:

- Any offence under Division 270 of the *Criminal Code Act 1995*, including slavery, forced labour,
- Any offence under Division 271 of the *Criminal Code Act 1995*,
- trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000; and
- the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999

In any situation where the legal implications of any action of the company or employee may be unclear, the Code of Conduct requires ITC Infotech's legal department be consulted. This eliminates scope for practices that may run contrary to the *Modern Slavery Act 2018* to be carried out by the Company or its agents.

4.2 Supplier obligations

The Code of Conduct is a document that applies not only to all permanent and fixed-term staff employed by ITC Infotech, but also all consultants, contractors, agency staff and other persons acting under or on behalf of ITC Infotech, in addition to any other person associated with the Company. It is therefore crucial in ensuring that ITC Infotech's operations are conducted appropriately having regard to the risks of modern slavery.

ITC Infotech conducts appropriate checks on all entities that engage with ITC Infotech as suppliers or service providers. ITC Infotech has requirements pre-dating the commencement of the *Modern Slavery Act 2018* (C2018A00153) requiring suppliers to assess their businesses and supply chains for compliance with the *Modern Slavery Act 2018* (Australia). These requirements are also incorporated into contracts entered with suppliers and service providers.

5. Assessing Effectiveness of Actions

Breaches of ITC Infotech's Code of Conduct are referred to internal disciplinary channels and appropriate action taken to address any issues.

ITC Infotech has taken reasonable actions such as having Code of Conduct in place and ITC Infotech also has remediation processes in place where any breaches would be dealt.

6. Consultation

The Code of Conduct and supplier procurement policies ensure effective compliance by ITC Infotech and the third parties with which it engages.

Code of Conduct and checks for suppliers referred to above are carried out in each country in which ITC Infotech operates – each subsidiary and branch entity is therefore aware and held accountable to the same Code of Conduct (including Modern Slavery Act adherence requirements) that are applicable to the head office. Non-compliance is similarly reported to management and steps taken to ensure compliance.

ITC Infotech's subsidiaries were consulted in the preparation of this statement, and they are subject to the same Code of Conduct, risk assessments and remediation mechanisms.

**This statement was approved by the principal governing body of ITC Infotech India Limited
on 11 / January / 2021**



Signed by: Raghavendra.L

Position: **General Manager (Talent Management)** being a member of ITC Infotech India Limited's principal governing body and authorized to sign modern slavery statements for the purpose of the *Modern Slavery Act 2018*

11th January 2021