

## Genpact Australia Pty Limited – Modern Slavery Statement 2025

### 1. Introduction

- a. Genpact Australia Pty Limited (ACN 615 571 423) (**GAPL, we or our**) satisfies the definition of 'reporting entity' set out at section 5 of the Modern Slavery Act 2018 (*Cth*) (the **Act**).
- b. This statement is made in accordance with sections 13 and 16 of the Act.

### 2. Structure and Operations

- a. GAPL was incorporated in New South Wales, Australia, on 22 December 2016. The registered office and principal place of business is Suite 3.01, Level 3, 55 Clarence Street, Sydney NSW 2000.
- b. GAPL is a subsidiary of Genpact Limited (together with its direct and indirect affiliates, "**Genpact**" or the "**Genpact Group**"), is a Bermuda company whose shares are publicly traded on the New York Stock Exchange. The Genpact Group has over 146,000 employees serving clients in key industry verticals from more than 35 countries.
- c. As a member of the Genpact Group, GAPL is an advanced technology services and solutions company. Powered by its mix of deep industry expertise, operational excellence and advanced technology, GAPL helps companies reimagine finance and risk, supply chain and other core industry operations.

### 3. Suppliers and Supply Chains

- a. Most of GAPL's suppliers are based in Australia, with additional services received from other Genpact Group entities to support client service delivery, which includes offshore delivery centres (**ODCs**) in India and Philippines.
- b. ODCs are an essential part of GAPL's supply chain and our overall competitive advantage.
- c. Other suppliers in GAPL's supply chain include:
  - i. software companies that supply software which is embedded into our solutions;
  - ii. subcontracting companies that provide human resources for client projects;
  - iii. IT infrastructure suppliers;
  - iv. facilities infrastructure suppliers; and
  - v. providers of ancillary administrative services (eg, legal, professional consultancy, travel services, etc.).

### 4. Risks of Modern Slavery

- a. GAPL does not manufacture or sell tangible goods.
- b. Given the type of business we operate and the services we offer, we believe that these arrangements do not introduce any significant new risks related to modern slavery. However, we do recognise the importance of continued vigilance with respect to the identification of potential modern slavery risks. We continue to review policies, processes and adopt any necessary improvements in order to enable us to identify risks of modern slavery and other human rights as part of our continued commitment to ethical and responsible business practices.

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## 5. Actions taken to assess and address risks

- a. We are committed to acting ethically in all our business dealings and relationships wherever we operate, which includes the implementation and enforcement of effective systems designed to counter slavery and human trafficking. We are also committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Genpact's Antislavery and Human Trafficking Policy reflects our commitment to act ethically and with integrity in all our business relationships. This includes implementing and enforcing effective systems and controls designed to ensure slavery and human trafficking is not taking place in our supply chains.
- b. We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our business and supply chains. In 2025 we:
  - i. continued the implementation plan developed in 2016;
  - ii. maintained a legal compliance team who continually monitors legal updates and educates internal stakeholders of the same, including the relevant obligations that our business must uphold;
  - iii. maintained the Integrity@Genpact – Third-Party Code of Conduct and Human Rights Policy, which set out Genpact's expectations on preventing modern slavery in our supply chain;
  - iv. maintained an internal team to address and work on potential modern slavery issues, comprising representatives from Legal and Compliance, Human Resources, Sourcing, Enterprise Risk Management, Audit, and Vendor Governance;
  - v. maintained and undertook an annual review of our Anti-Slavery and Human Trafficking Policy;
  - vi. maintained a Critical Incident Response Plan;
  - vii. trained key personnel on the requirements of the Modern Slavery Act and our standard approach to combatting modern slavery;
  - viii. maintained standard modern slavery clauses in supplier contracts; and
  - ix. reviewed and updated third party due diligence compliance screening processes, including completion of self-assessment questionnaires and compliance screening against risk drivers.
- c. In addition, Genpact issued an annual sustainability report in accordance with the International Standards on Assurance Engagements 3000, utilising Global Reporting Initiative and Sustainability Accounting Standards Board standards. These reports provide a comprehensive overview of environmental, social, and ethical performance, including supply chain practices.

## 6. Remediation Processes

- a. As at the date of this Statement, we are not aware of any current or previous issues or concerns relating to slavery or human trafficking within our business or supply chains. GAPL has not been charged with or convicted of any offences relating to slavery or human trafficking. Accordingly, we have not had to undertake any remediation activities.

## 7. Assessing Effectiveness

- a. We regularly review and assess the risk of modern slavery across our operations and supply chains, including by:
  - i. periodic risk assessments;
  - ii. seeking reassurances and conducting due diligence or audits of contractors, suppliers and business partners;

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- iii. monitoring incident reports and whistleblowing notifications;
  - iv. annual enterprise-wide risk assessments, overseen by the Risk Council; and
  - v. continuous improvement of strategies to ensure responsiveness to new risks.
- b. Overall, we consider the steps taken are effective in ensuring that slavery and human trafficking is not taking place in our business or supply chains. We haven't identified any incident that could affect the achievement of our objectives. As confirmation of Genpact's commitment to leading with integrity and prioritising ethical business practices, Genpact has been recognised multiple times, including in 2025, 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://worldsmoethicalcompanies.com/honorees/>.

## 8. Consultation Process

- a. GAPL consults closely with Genpact UK Limited, which has submitted Modern Slavery Statements under UK law since 2016, as well as with internal Legal and Compliance, Audit, Vendor Governance, Human Resources, and Sourcing teams. This collaborative approach ensures ongoing compliance and best practice in addressing modern slavery risks.

## 9. Approval and Sign-off

- a. This Modern Slavery Statement is approved by the directors of GAPL.

Signed by:

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**Varun Jain**  
Director

Signed by:

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**Timothy Graham**  
Director

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