

## HCL AUSTRALIA SERVICES PTY LTD

### MODERN SLAVERY STATEMENT

This joint statement has been prepared by HCL Australia Services Pty Ltd ABN 72 081 196 983 ("HCL Australia") and DWS Pty Ltd ABN 83 085 656 088 under section 14 of the *Modern Slavery Act 2018* (Cth) ("MSA") to describe the steps that have been taken in response to the matters set out in section 16 of the MSA during the reporting period spanning from 1 April 2024 to 31 March 2025.

### ORGANISATION'S STRUCTURE AND OPERATIONS ss 16(1)(a),(b) MSA

HCL 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 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 and global delivery capabilities, HCLTech delivers holistic services across industry verticals to leading enterprises, with approximately 20,000 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 220,737 staff based across 60 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 nor does it hold any investments.

The current list of subsidiaries owned or controlled by HCL 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 (New Zealand) Limited.

DWS Pty Ltd (**DWS**) owns each of the entities listed above at 1(a) – (f) and is also a reporting entity under the MSA. DWS was established in 1991 and is a leading Australian IT, Business and Management Consulting Services Group providing services to a broad range of blue-chip corporate clients as well as Federal, State and Local Government agencies. The entities listed above conduct 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, Wallis Nominees (Computing) Pty Ltd, DWS (NSW) Pty Ltd, Symplicit Pty Ltd and Projects Assured Pty Ltd are the main entities active in the market, with the balance being operational entities that are not actively trading.

HCL Australia and DWS have offices in Adelaide, Brisbane, Canberra, Melbourne, Perth and Sydney. HCL Australia's registered office is in Sydney, NSW and DWS's head office is located in Melbourne. HCL Australia together with DWS employ 1,731 staff, with 470 of those belonging to DWS and its subsidiaries and the remainder belonging to HCL Australia. Of the 1261 staff HCL Australia employs 1176 are permanent full-time employees, and the remainder are third party, with 70% of permanent full-time staff being Australian citizens or holding permanent residency. For DWS and its subsidiaries, 451 staff are employed on a permanent full-time basis and 19 staff are employed on a casual basis. DWS does not employ any staff working in an arrangement where their visa ties them to the business but employs a small number of staff in New Zealand and works with six staff contracted through a third party located in the Philippines.

HCL Australia and DWS 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

HCL 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, equipment hire), and business services (including facility management services, cleaning, security services, office stationery supplies, printing, real estate, utilities, logistics, recruiting, insurance, travel, finance, marketing, training, legal services and consulting services). HCL Australia in the 2024-2025 financial year procured from 184 suppliers. The arrangements with our suppliers vary depending on many factors but are generally stable long-term agreements. The majority of our suppliers (83.15%) are based in Australia, whilst 8.15% are based in lower risk countries including Canada, Denmark, Japan, Luxembourg, New Zealand, Sweden, Switzerland, the United Kingdom, Singapore, Hong Kong and the United States. We acknowledge that the remaining 8.7% of our supply chain are based in countries with a higher prevalence of modern slavery according to the 2024 Global Slavery Index.

DWS 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 direct involvement with manufacturing suppliers. DWS and its six subsidiaries have a total of 406 tier 1 suppliers between them. Those suppliers include government entities, stationery, furniture, catering, equipment, postage, printing, payroll services, legal services, rental properties, real estate services, insurance, accommodation, travel services, e-waste services, security, cleaning services, and software products and services. Of those suppliers, 95.32% are based in Australia, 4.43% are based overseas in countries that have a low prevalence of modern slavery, and only 0.25% are based in countries that have a high prevalence of modern slavery.

## MODERN SLAVERY RISKS ss 16(1)(c) MSA

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

### *Operations*

HCL Australia and DWS' workforces include non-local labour employees that are on visas as detailed above. 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. Separately, we note that DWS works with six individuals who are employed via a third party in the Philippines. Members of our Sydney team work closely with these six individuals, who also use our timesheets to track their working hours. We have close oversight of these workers and meet with them regularly. One of these workers has been with us since 2016. We are given details regarding the relevant working conditions of each staff member including the number of working hours per week, working days per month, salary details, HR and legal support provided to staff, monitoring and oversight of staff wellbeing and productivity, access to employee amenities such as gyms and administration of payroll processes (including tax, social security, health insurance, 13<sup>th</sup> month pay etc).

HCL Australia staff largely work on our clients' premises. 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 off-site, 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 Australia 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.

DWS considers that people are at the heart of our business. Most employees are employed on a permanent full-time basis, with a 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. Similarly to HCL Australia, DWS employees largely work on our clients 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 due for a number of reasons, including instances of forced labour identified in electronics factories in locations such as China and Malaysia. The products and services that HCL 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 due to the complex and opaque nature of these industries and the potential use of goods linked to higher risks of modern slavery. HCL Australia's operations are entirely based in Australia and DWS'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. HCL Australia deals with all Australian businesses.

#### *Supply Chains*

HCL 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 has a more localised supply chain.

Neither HCL Australia nor DWS are directly involved in manufacturing and do not directly procure the high-risk goods that are often part of IT products 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. HCL Australia and DWS 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. HCL Australia sources our goods and services from many different suppliers who are located all over the globe. Of HCL Australia's 184 suppliers, we are aware that a significant portion are based in Australia or in low-risk geographic locations, but also that 8.67% of our suppliers are in locations cited as having a high prevalence of modern slavery. DWS and its six subsidiaries have only 0.25% of suppliers based in countries with a high prevalence of modern slavery. Although many suppliers are based in Australia, we acknowledge that these suppliers may in turn source their goods or services from suppliers in other countries, which may be more vulnerable to or have a higher prevalence of modern slavery.

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

## **ACTIONS AND EFFECTIVENESS ss 16(1)(d),(e) MSA**

HCL Australia is committed to always making long-lasting improvements to workers' employment, workplace conditions, systems and processes related to its operations. HCL Australia currently maintains Labour Hire Licences for Victoria and Queensland.

DWS was built upon the values of Integrity, Honest and Transparency and they underpin the business to this day. DWS 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. DWS also maintains Labour Hire Licences in all relevant Australian States (presently being Victoria, Queensland and the ACT).

### *Policies and Processes*

HCL Australia in 2024, rolled out 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 is applicable to all staff and outlines 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 has been sent to all 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.

The principle of Trust through Transparency and Accountability is at the core of HCLTech's existence, as enshrined within HCLTech's global 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.

In relation to suppliers, HCLTech also has a Procurement Policy which sets out the guidelines to be followed by the HCLTech group, including HCL Australia, for the purposes of procuring requisite goods and services from vendors across the globe. We 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 social responsibility, sustainability, employee health and safety record, reputation and undertaking reference checks. In 2024, we added another element to this due diligence through an online search assessment called "L1" which identifies a range of risks including modern slavery risks. This allows for HCLTech to better understand the risks of slavery or human trafficking in our supply chain or in any part of our business. We also have

a Vendor Onboarding System that has questions related to sustainability and modern slavery. As part of the Onboarding System, suppliers are required to complete a self-assessment regarding modern slavery risks and report to HCLTech any non-compliance or breaches of the Code.

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. We consider this an important tool in using our leverage to ensure any impacts of modern slavery are remediated.

HCL is also certified under ISO 9001 and complies with all of the rigorous reporting requirements associated with maintaining that certification. Under ISO 9001, we conducted a standard supplier audit in the last reporting period. Our contracts provide us with the ability to audit all suppliers annually should we choose to.

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, the Policy and the Code, 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.

DWS maintains a modern slavery policy. DWS operates a Quality Management System which is also certified under ISO 9001:2015 which has appropriate monitoring and auditing allowing identification of potential areas for improvement and the implementation of any required remediation. DWS was last audited itself for ISO 9001 requirements in the 2024– 2025 reporting period. DWS also maintains a set of policies and procedures relevant to the safety and wellbeing of our people, 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. DWS 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.

DWS completed a modern slavery review of key suppliers. This included understanding and assessing how modern slavery was addressed in the operations of those suppliers. DWS has also collated a list of all suppliers that the parent body and six subsidiaries worked with in the reporting period and has examined this list for potential higher risks. We are committed to ensuring that the suppliers we engage with are reputable and have the proper internal governance and checks to ensure that modern slavery risks are minimised within their organisation. DWS 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 will continue to maintain a register of suppliers with a view to surveying suppliers who do not have a published modern slavery statement so we may take steps to minimise the possibility of inadvertently contributing towards modern slavery risks.

### *Reporting*

HCL Australia 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. Similarly to HCL Australia, DWS understands that having retribution-free reporting avenues is key in the fight against modern slavery and as such DWS also maintain Whistleblower Policies and processes.

### *Training*

HCL Australia and DWS are also developing training modules for staff in the area of modern slavery. We have previously 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. DWS has also included modern slavery topics in its mandatory compliance training which is undertaken by all staff upon induction and every 2 years from there on.

Each HCL Australia 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 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.

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 ss 16(1)(f) MSA**

HCL Australia has in consultation with DWS regarding modern slavery. DWS has a separate board to HCL 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.

HCL Australia invited representatives from DWS to attend our tailored interactive workshop referenced above so that we could consult on next steps in this space. HCL Australia has also commenced discussions with DWS representatives as to each of our modern slavery risk profiles and approaches and how we can share ideas and learnings going forward to develop efficiencies across the entities and endeavour to continue to consult on these matters.

The entities within DWS share a common executive leadership team, who conduct discussions with regular frequency on risk, governance, and process improvement. This includes consultation on the risk, action and effectiveness of modern slavery measures within the group, which has assisted with the preparation of this statement.

### **APPROVAL**

The HCL Australia Board of Directors and the DWS 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 HCL Australia Board of Directors by circular resolution passed on September 29, 2025.

#### **For HCL Australia Services Pty. Limited**

Signed by:

 **Shiv Kumar Walia**

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**Shiv Kumar Walia**

**Director**

Responsible Member of HCL Australia's Principal Governing Body

This modern slavery statement was considered and approved by the DWS Board of Directors by circular resolution passed on September 29, 2025

#### **For DWS Pty. Limited**

Signed by:

 **Shiv Kumar Walia**

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**Shiv Kumar Walia**

**Director**

Responsible Member of DWS's Principal Governing Body