

DATE OF STATEMENT: 14<sup>th</sup> December, 2018 (FOR THE YEAR 2019)

## SLAVERY & TRAFFICKING STATEMENT

### INTRODUCTION FROM THE DIRECTOR -

#### **What is the Modern Slavery Act 2015 and Why Do Businesses Need to Know about It?**

The Act deals with a variety of matters relating to slavery and human trafficking. The most relevant section for businesses is section 54 which will require commercial organisations over a certain size to disclose what activities they have undertaken to eliminate slavery and human trafficking from their supply chains and their own business.

#### **What is “Slavery and Human Trafficking”?**

The term covers a number of specific offences under the Act but in very general terms “slavery” is where ownership is exercised over a person, where individuals are coerced into providing their services or do so under threat of a penalty. “Human trafficking” covers arranging or facilitating the travel of individuals with a view to exploiting them.

### INTRODUCTION

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

### **ORGANISATION’S STRUCTURE**

Syntel Europe Limited has its headquarters in London, UK. It has presence in UK and Ireland. It represents 7 % of Syntel’s revenue. Each and every day, Syntel helps Global 2000 clients around the world operate their businesses more efficiently through innovation, technology, and wisdom. Syntel Europe Limited has been providing technology and business services to customers since 1997. Our Europe operations have more than doubled over the past five years and we provide services to 16 organizations across Europe.

Syntel Europe Limited has an annual turnover of GBP 50,301,666.

Syntel Europe Limited’s parent company Syntel, Inc. was acquired by Atos S.E. in October 2018.

Atos is a global leader in digital transformation with 120,000 employees in 73 countries and annual revenue of € 13 billion. European number one in Cloud, Cybersecurity and High-Performance Computing, the Group provides end-to-end Orchestrated Hybrid Cloud, Big Data, Business Applications and Digital Workplace solutions through its Digital Transformation Factory, as well as transactional services through Worldline, the European leader in the payment industry. With its cutting-edge technologies and industry knowledge, Atos supports the digital transformation of its clients across all business sectors. The Group is the Worldwide Information Technology Partner for the Olympic & Paralympic Games and operates under the brands Atos, Atos Syntel, Unify and Worldline. Atos is listed on the CAC40 Paris stock index.

### **OUR SUPPLY CHAINS**

Our supply chains include getting new clients and then sourcing employees to work on client projects (employees even work from client locations), principally related to providing solutions to our clients in various business units as mentioned above.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

This statement sets out Syntel Europe Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> January 2019 to 31<sup>st</sup> December 2019. Our Anti-slavery Policy mentioned below reflects our commitment to acting ethically and with utmost integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking does not take place anywhere in our company premises or supply chains.

"No person shall be compelled or coerced by Syntel to work against that person's willful consent. In particular, Syntel shall not force or coerce any person to work using violence, or threat of violence. Syntel shall not have any form of prison labor or involuntary labor.

Syntel condemns the practice of any form of slavery, including.

- Child slavery,
- Forced labor,
- Descent-based slavery, and
- Trafficking."

Syntel does not (a) participate in human trafficking; (b) use forced, involuntary, or slave labor; or (c) knowingly purchase materials or services from entities using forced, involuntary, or slave labor. We certify that materials included in our products/services comply with the slavery and human trafficking laws of the country or countries in which we do business.

All employees of Syntel shall be individuals who apply for employment with Syntel on their own volition and will continue to be free agents through their employment with Syntel. All employees shall be paid at least the minimum wages as required under the applicable law.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The organization undertakes due diligence when considering onboarding new suppliers, and regularly reviews its existing suppliers.

**As part of our initiative to identify and mitigate risk -**

- We insist, in our agreements, that our suppliers comply with local laws and ensure that they do not indulge in child labor or forced labor practices.
- We build long-standing relationships with local suppliers and make clear our expectations of business behavior.
- We audit our suppliers at regular intervals for payment of minimum wages and social security contributions.
- We have in place systems to encourage the reporting of concerns and to protect whistleblowers.

## SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

**The respective BU Heads are responsible for compliance in their respective departments and for their supplier relationships.**

## TRAINING

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To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff as per our training module. Syntel offers training through appropriate forums and workshops to its employees who are responsible for supply chain management and its suppliers on slavery and human trafficking, specifically regarding how to identify and to respond to supply chain issues in accordance with the applicable laws.

#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Audits by the personnel team;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This is a non-contractual statement and is subject to change as and when needed.

This statement has been approved by The Board of Directors of Syntel Europe Limited.

For Syntel Europe Limited



Anil Agrawal

Director

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