# **Genpact (UK) Limited**

# Slavery and Human Trafficking Statement 2016 - 2017

## 1. Financial year

- 1.1 This slavery and human trafficking statement relates to the company's financial year beginning  $1^{st}$  January 2016 and ending  $31^{st}$  December 2016, as well as the current financial year starting with  $1^{st}$  January 2017.
- 2.2 We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our supply chains and in our business.
- 2.3 In 2016 and during 2017 as a group we have:
- (a) appointed solicitors to assist the group with our approach to the issue of modern slavery and our compliance with the UK Modern Slavery Act 2015;
- (b) formed an internal team to work on modern slavery issues comprising members of the Legal and Compliance and Vendor Governance Framework groups;
- (c) produced and circulated a guidance note on the provisions of the Act;
- (d) updated our existing policies to include reference to the Modern Slavery Act;
- (e) developed an Anti-Slavery Policy;
- (f) developed a Critical Incident Response Plan;
- (g) drew up an Action Plan;
- (h) trained a number of key executives on the requirements of the Act;
- (j) developed some modern slavery clauses for our standard supplier terms and conditions;
- (k) drew up a list of our first tier suppliers;
- (I) carried out a desk top risk assessment of our first tier suppliers; and
- (m) developed and introduced a supplier due diligence questionnaire.

- 2.4 It is our policy to conduct all business ethically and in accordance with the UK Government's Modern Slavery Strategy, as amended from time to time, and as outlined in the UK Home Office Guidance "Transparency in Supply Chains: a Practical Guide" published on 29 October 2015.
- 2.5 We are committed to acting ethically in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter slavery and human trafficking.
- 2.6 We understand that we are covered by the UK Modern Slavery Act 2015 because:
- (a) we are a body corporate;
- (b) carrying on business or a part of its business in the UK;
- (c) which supplies goods or services; and
- (d) has a turnover of over £36 million per year.

### 3. Organisation's structure

- 3.1 Genpact (UK) Ltd. was incorporated in 2001 and is based in London, United Kingdom. Genpact (UK) Ltd. operates as a subsidiary of Genpact Limited (together with its direct and indirect subsidiaries, "Genpact" or the "Genpact Group"), a Bermuda company whose shares are publicly traded on the New York Stock Exchange. Genpact is a global provider of business support services focusing on technological innovation and digital transformation.
- 3.2 As a member of the Genpact Group, Genpact (UK) Ltd. provides business services to international customers, including: collections, finance and accounting, industrial solutions, IT managed services, master data management, IT infrastructure services, supply chain management.
- 3.3 The turnover of Genpact (UK) Ltd. and its subsidiary undertakings in the financial year ending 31 December 2016 was £66 million GBP.

#### 4. Our business

4.1 We are a global professional services firm focused on delivering digital transformation for our clients, putting digital and data to work to create competitive advantage. The Genpact Group has operations in 25 countries around the world from 70 delivery centers servicing more than 700 global clients. For two decades we have been generating impact for clients from the Fortune Global 500 and beyond. The Genpact Group now employs over 77,000 people in more than 20 countries, and has key offices in New York City, Palo Alto, London, and Delhi.

#### 5. Our suppliers and supply chains

5.1 Most of Genpact UK Limited's suppliers are based in Europe. We also receive services (such as technology, digital and business process services) from other members of the Genpact Group.

#### Our main suppliers are:

(a) software companies (international, mostly Europe and US) that provide software that we embed into our products;

- (b) subcontracting companies (international) that provide sub-contracted human resources on customer projects;
- (c) IT infrastructure suppliers (international);
- (d) facilities infrastructure suppliers (international); and
- (e) ancillary administrative services (Legal, Professional consultancy, Travel services etc).

## 6. Our policies on slavery and human trafficking

6.1 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## 7. Due diligence processes for slavery and human trafficking

- 7.1 As part of our initiative to identify and mitigate risk we have requested to our suppliers to sign up to a code of practice or warranties and have asked tier 1 suppliers to respond to a UK Modern Slavery Act Questionnaire.
- 7.2 Our Anti-Slavery Policy is a first step towards the company having in place systems to:
- (a) identify and assess potential risk areas in our supply chains;
- (b) mitigate the risk of slavery and human trafficking occurring in our supply chains;
- (c) monitor potential risk areas in our supply chains; and
- (d) protect whistleblowers.
- 7.3 Genpact has constituted a formal Risk Council in 2016. The Risk Council reviews the Genpact Group's overall risk profile periodically and reports the key business risks to the board of directors of Genpact Limited. The Enterprise Risk Management Office is headed by the Enterprise Risk Leader who is responsible for ongoing maintenance of Enterprise Risk Management at Genpact. Annually, an enterprise wide risk assessment is conducted and risks to the organization are identified and assessed on the likelihood and impact scale. Changes in the regulatory and legal environment, as UK Modern Slavery Act, which could have an impact on the organization are also subject to the regular risk assessment activity.
- 7.4. We have been releasing annual sustainability communications since 2008. While the earlier communications were based on the 10 principles of the United Nations Global Compact, we started reporting on sustainability performance using the more comprehensive Global Reporting Initiative Framework in 2011. These regular reports provide a holistic picture of our organisation's performance, covering environmental, social, and ethical criteria in addition to economic data which includes also our supply chain. The 2016 report is available on our website, www.genpact.com.

## 8. Supplier adherence to our values

- 8.1 To ensure all those in our supply chain and contractors comply with our values and ethics we will be designing and rolling out a supply chain compliance programme.
- 8.2 We have a group of dedicated resources from the following departments:
- (a) Legal and Compliance;
- (b) Audit;
- (c) Vendor Governance Framework;
- d) Enterprise Risk Management;
- (c) Human resources; and
- (d) Sourcing.
- 8.3 The team reports to Sharon Thomas who has overall responsibility for the company's response to the challenge of slavery and human trafficking and in accordance with the requirements of the Act has signed this statement below.

#### 9. Effectiveness

9.1 It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that slavery and human trafficking is not taking place in our business or supply chains. As part of our work for the current financial year we will be considering how best to monitor the effectiveness of the actions taken.

#### 10. Training

- 10.1 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 the following groups:
  - (a) Legal and Compliance;
  - (b) Vendor Governance Framework;
  - (c) Sourcing; and
  - (d) HR.

Signed

Director

Name: Sharon Thomas

GENPACT UK LIMITED
Date: 27 June 2017