

**Genpact (UK) Limited**  
**Slavery and Human Trafficking Statement**  
**January 2022 – December 2022**

**1. Financial year**

1.1 This slavery and human trafficking statement relates to the company's financial year beginning 1<sup>st</sup> of January 2022 and ending 31<sup>st</sup> of December 2022. To keep the information as up to date as possible, we have also included work from the current financial year starting with 1<sup>st</sup> of January 2023.

**2. Our practices to combat slavery and human trafficking**

2.1 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.

2.2 In 2022, as a group, we have:

- (a) continued the implementation of the action plan developed in 2016;
- (b) maintained a Legal Compliance team who continually monitors legal updates and educates internal stakeholders of the same and the obligations Genpact as an organisation must uphold;
- (c) maintained our internal team to work on potential modern slavery concerns, comprising members of the Legal Compliance and Vendor Governance Framework groups;
- (d) maintained a code of conduct applicable to the third parties Genpact is dealing with, namely the Integrity@Genpact – Third-Party Code of Conduct (publicly available here: <https://website-files.genpact.com/downloadable-content/genpact-third-party-code-of-conduct.pdf>), to set out Genpact's expectations on preventing modern slavery and/or human trafficking in our supply chain;
- (e) maintained a code of conduct applicable to Genpact employees, namely the Integrity@Genpact – Our Code of Conduct (publicly available here: <https://website-files.genpact.com/downloadable-content/genpact-code-of-conduct.pdf>), to set out Genpact's expectations on preventing modern slavery and/or human trafficking in our business;
- (f) maintained an Antislavery and Human Trafficking Policy;
- (g) maintained a Critical Incident Response Plan;
- (h) trained key personnel on the requirements of the Modern Slavery Act and our standard approach;
- (i) maintained standard modern slavery wording for the relevant supplier terms and conditions; and
- (j) reviewed and updated the third party due diligence compliance screening process.

In 2022, we have continued the implementation of the action plan and the remaining ongoing activities in order to ensure continuous compliance.

2.3 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" first published on 29<sup>th</sup> of October 2015 and updated in the following years.

2.4 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.

2.5 We understand that we are covered by the Modern Slavery Act because:

- (a) we are a body corporate;
- (b) we carry on business in the UK;
- (c) we supply services; and
- (d) a turnover of over £ 36 million per year has been reached previously.

### **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 affiliates, "Genpact" or the "Genpact Group"), a Bermuda company whose shares are publicly traded on the New York Stock Exchange. Genpact is a global professional services 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.

### **4. Our business**

- 4.1 Genpact (NYSE: G) is a global professional services firm that makes business transformation real. Led by our purpose – the relentless pursuit of a world that works better for people – we drive digital-led innovation and digitally enabled intelligent operations for our clients. Guided by our experience reinventing and running thousands of processes for hundreds of clients, many of them Global Fortune 500 companies, we drive real-world transformation at scale. We think with design, dream in digital, and solve problems with data and analytics. Combining our expertise in end-to-end operations and our AI-based platform, we focus on the details – all 100,000+ of us. From New York to New Delhi and more than 30 countries in between, we connect every dot, reimagine every process, and reinvent the ways companies work.

### **5. Our suppliers and supply chains**

- 5.1 Most of Genpact UK Ltd'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 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. Genpact Antislavery and Human Trafficking 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.
- 6.2 Moreover, our current global code of conduct for suppliers, Integrity@Genpact – Third-Party Code of Conduct, specifically states our expectation that our suppliers must also comply with all applicable laws and regulations regarding the use of forced labor, slavery, and human trafficking, and should guard against the existence of any such illegal labor practices in every part of their supply chains.
- 6.3 We continue to review our policies, processes and adopt necessary improvement that enable us to identify risks of modern slavery and other human rights as part of our continued commitment to ethical and responsible business practices.

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

- 7.1 As part of our initiative to identify and mitigate risk, as a standard approach, we are requesting our relevant suppliers to acknowledge our code of conduct and to respond to a UK Modern Slavery Act questionnaire, as part of our process to engage with new suppliers.
- 7.2 Genpact Antislavery and Human Trafficking 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 whistle-blowers.

7.3 Genpact has in place a formal Risk Council. 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. An enterprise-wide risk assessment across functions, businesses and regions is conducted regularly and risks to the organization are identified and assessed on the likelihood and impact scale.

Genpact conducts policy effectiveness surveys for employees and external landscape through the external risk surveys and industry benchmarks to evaluate organization risk landscape against the industry and look for external risk drivers that could affect Genpact.

Changes in the regulatory and legal environment, such as the Modern Slavery Act, and the criminal and societal issues which those changes aim to address, which could have an impact on the organization, are also subject to the regular risk assessment activity.

7.4 Genpact has been releasing bi-annual sustainability communications. The Genpact Sustainability Report 2021 (publicly available here: <https://website-files.genpact.com/downloadable-content/insight/genpact-sustainability-report-2021.pdf>) is the eighth sustainability report published by Genpact Limited (Genpact). The report has been developed in accordance with the Global Reporting Initiative Sustainability Reporting Standards. These regular reports provide a holistic picture of our organisation's performance, covering environmental, social, and ethical criteria in addition to economic data which also includes our supply chain.

## **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 have designed and rolled out a supply chain compliance programme.
- 8.2 We have a group of dedicated resources from different departments, such as Vendor Governance Office, Sourcing, Legal Compliance, Audit.
- 8.3 We undertake appropriate due diligence of our current and potential suppliers, using a risk-based approach. As a standard approach, relevant suppliers are required to complete a self-assessment on Modern Slavery standards and are part of a preliminary vetting process.
- 8.4 In August 2020, Genpact updated the third-party due diligence compliance screening process. At the time of onboarding a new third party, Genpact Enterprise Risk and Compliance Group performs an additional screening against several risk drivers (including "adverse media") for the relevant categories of third parties. This screening should capture any publicly available adverse media information, including on modern slavery and human trafficking (if any) with respect to the third party. The compliance screening on adverse media is performed on a regular basis. In April 2023, Genpact has revised and updated the third-party due diligence compliance screening process to ensure the compliance screening is performed as soon as possible in the vendor onboarding process.
- 8.5 We respond to, investigate all concerns promptly, and take any necessary corrective actions, if necessary. Our whistleblowing programme did not register notifications related to modern slavery in 2022.
- 8.6 Genpact takes overall responsibility for the company's response to the challenge of slavery and human trafficking and in accordance with the requirements of the Modern Slavery Act.

## **9. Effectiveness**

- 9.1 We consider that the steps we have been taking are effective in ensuring that slavery and human trafficking is not taking place in our business or supply chains, as so far, we haven't identified any incident that could affect the achievement of our objectives. As part of our plans for the current financial year, we will continue to monitor the effectiveness of the actions taken and will ensure that our strategy is responsive to any potential risks.
- 9.2 As a confirmation of Genpact's commitment to leading with integrity and prioritizing ethical business practices, Genpact has been recognized multiple times, including in 2022, 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://www.worldsmostethicalcompanies.com/honorees/>.

## 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 have provided training to the following groups' members:

- (a) Legal Compliance;
- (b) Vendor Governance Office;
- (c) Sourcing; and
- (d) HR.

We continued our programme of regional training and awareness building among the employees to support them in identifying potential Slavery and Human Trafficking risks.

This update of the Slavery and Human Trafficking Statement has been approved by the Board of Directors of Genpact (UK) Ltd shall be effective starting with 30<sup>th</sup> of June 2023.

Signed  DocuSigned by:  
Lester D'Souza  
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**GENPACT (UK) LIMITED**