

THE ZENSAR TECHNOLOGIES GROUP OF COMPANIES – MODERN SLAVERY ACT STATEMENT

INTRODUCTION FROM MR SANDEEP KISHORE AND MR CHAITANYA RAJEBHADUR

This is a joint statement, published on behalf of Zensar Technologies Limited and Zensar Technologies (UK) Limited.

We are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

OUR BUSINESS AND ORGANISATION STRUCTURE

Zensar Technologies Limited is the parent company of the Zensar Group of Companies specialising in providing information technology services and infrastructure services with headquarters in Pune, India.

Zensar Technologies is a global company with offices in 38 global locations.

Zensar Technologies (UK) Limited is our UK based company.

The Group has grown through various mergers and acquisitions. Further information is available about the Group on www.zensar.com.

All companies within the Group operate as global subsidiaries of Zensar Technologies Limited and are expected to adhere to the same rigorous standards of ethical behaviour and social responsibility.

OUR SUPPLY CHAINS

The primary suppliers in our supply chain are third party companies that supply Zensar Group Companies with resources. Other suppliers within our supply chain include hardware or software suppliers, office facilities suppliers, infrastructure suppliers, travel and hospitality services suppliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Corporate Social Responsibility is extremely important to the Zensar Technologies Group of Companies and can be summarised as follows:

- Our vision is to foster happiness and well-being of people and communities, thereby enabling them to realize their full potential.
- Our mission is to build empowered communities and foster the agency of individuals to lead and subsequently enable social transformation.
- Our values are to help people live with dignity, equality, empathy, integrity, freedom and creativity – and lend wings to their dreams.

We view our policy on slavery and human trafficking as an extension of these duties to conduct our business in an ethical and socially responsible way.

Zensar Technologies expects all companies within our group to adhere to and advance these core principles.

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We are committed to ensuring that there are no practices that promote or encourage 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 does not take place anywhere in our supply chains.

From 1st April 2019, we have been including in our commercial contracts with suppliers, specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we will further encourage our suppliers to hold their own suppliers with the same high standards.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have established a set of policies and procedures that govern the way the Zensar Group of Companies operate.

In particular, we ensure that:

- We provide our employees and workers with at least the minimum conditions required by the local statutes where we operate, including provision of the national minimum/living wage and statutory leave entitlement;
- Wage levels are audited monthly through the company's payroll;
- Our employment contracts and policies and procedures are audited independently and updated regularly to ensure compliance with current legislation;
- Checks are carried out prior to engaging employees, workers or contractors to ensure that they have NI, Social security or other statutorily recognized unique identification numbers (as applicable) and that they are eligible to work in the countries in which they are working and/or residing.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains through a committed task force;
- Help employees understand how they should report suspected instances of modern slavery and child trafficking;
- Protect whistle blowers;
- Include into the task force, members from all key functions within the organization; and
- Ensure employees and suppliers can register their concerns, ask queries, questions and seek guidance from the taskforce by simply writing to Combat.MSlavery@zensar.com.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have formed a dedicated compliance team, which consists of representatives from our Human Resources, Legal, Compliance and Procurement Departments.

Their remit is to ensure that all of our business partners comply with the high standards which we set for ourselves and ensure that their own organisations and supply teams are free from slavery and human trafficking.

The team will seek to monitor any risk areas and encourage anyone to report any concerns regarding supplier activities.

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TRAINING

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 our principals, employees and workers with a copy of our modern slavery policy, which they are required to read and understand. We also encourage them to report any concerns to their manager or the compliance team.

We have referred to our people the website modernslavery.co.uk to provide them with useful information on modern slavery and human trafficking, how to recognise the different types and how to report it along with details of a helpline. We will circulate a training module to create awareness on modern slavery and human trafficking with our employees who manage the supply chain.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following as benchmark to measure the effectiveness of our systems in ensuring compliance with the requirements and prevention of the slavery and human trafficking practices in our business and supply chains:

- Listing down details of any concerns raised by our principals, employees or workers about Zensar Group of Companies and putting in place the measures to curtail any such concerns in future;
- Information provided to us by our suppliers, and utilize it further to develop our modern slavery awareness activities.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there are no practices that encourage slavery or human trafficking in our supply chains we will continue to improve our processes, continue to encourage our principals and staff to report any concerns they have. We will continue to ensure that we comply with the statutory requirements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Zensar Group of Companies' slavery and human trafficking statement for the financial year ending 31 March 2021.

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Signed by a Director of Zensar Technologies Limited

			
Signed:	_____	Name:	<u>Sandeep Kishore</u>
Position:	<u>CEO & Managing Director</u>	Date:	<u>30th September 2020</u>

Signed by a Director of Zensar Technologies (UK) Limited

			
Signed:	_____	Name:	<u>Chaitanya Rajebahadur</u>
Position:	<u>EVP and Head of Europe</u>	Date:	<u>30th September 2020</u>