

MODERN SLAVERY ACT – STATEMENT (Financial Year 2020-21)

eClerx Services Limited (hereinafter referred to as “We” or “eClerx”) is publishing this Statement pursuant to Section 54 of the Modern Slavery Act, 2015 to disclose publicly the steps taken to tackle slavery, servitude, forced or compulsory labour and human trafficking.

We are committed to exhibit zero tolerance towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015.

In pursuance of this, we publish this statement pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) elucidating the initiatives undertaken to eradicate the slavery and/or human trafficking from our supply chain or in any part of our organization for the financial year of 2020-2021.

Our Structure, Business and Supply Chains:

eClerx is in the business of knowledge process outsourcing and provides Information Technology Enabled services (‘ITEs’). eClerx provides ITEs services to clients in the financial, retail and manufacturing industry.

eClerx Services Limited is an Indian public limited company, listed on various Stock Exchanges in India, and has its branches and subsidiaries across 8 countries. eClerx Limited, which is the subsidiary of eClerx Services Limited does its business in the UK relating to selling and delivering ITEs services and any relationship between eClerx Services Limited and eClerx Limited are at an arms’ length. eClerx Limited has its office in UK at 1 Dover Street, 1st floor London, W1S 4LA, UK. Approximately 39 employees of eClerx work in the UK at its own offices or from home or at its clients’ locations.

eClerx’s business is primarily the provision of Information Technology enabled services. Its business is service based, very client centric and client focused, and eClerx does not manufacture any significant products. eClerx provides business to business services, and does not provide services directly to consumers.

eClerx also does not have any specific supplier ecosystem. Any suppliers and partners which eClerx engages with are specific to client requirements. Most of the material suppliers are global IT product or software suppliers. eClerx does contract very few IT services and IT resources with specialised skills from certain suppliers, but they work with eClerx and eClerx’s clients’ teams for co-creating and implementing client required software and solutions. Therefore, at eClerx, we do not have supply chain as such.

Policy and due diligence:

We expect our employees and suppliers to meet the provisions set out by us in our policy for Code of Conduct (“Code”) and Employment Practices Policy (“Policy”), which include our policies on slavery and human trafficking. The Code is a set of guiding principles and covers all directors, employees, third party vendors, consultants and

customers across the world. Our anti-slavery policy has been captured in the Code and accessible through <https://eclerx.com/investor-relations/corporate-governance/>, which reflects our intention to ensure effective implementation of human integrity and complete eradication of slavery and human trafficking. To ensure complete compliance, we provide the Code of Conduct Training, to all employees to increase awareness. The Code of Conduct is also provided to all our suppliers and we specifically include a clause in our supplier agreements mandating the suppliers to comply with our Code of Conduct and its inherent principles, failing which the agreements can be immediately terminated by eClerx.

Every individual employee of eClerx is required to undergo this training program. The Code is available on intranet and on the company website for reference.

Risk assessment:

To ensure removal of any instances of slavery or human trafficking or any other form of exploitation or malpractice in dealing with employees, contractors or vendors, we have regular audits within eClerx, conducted by the internal audit team. We also have strong publicly available whistle-blower mechanism which is directly monitored by committee of the Board of Directors. These audits aim at improving our understanding of where the risks are greatest and prioritising our activity accordingly.

eClerx strictly adheres to and complies with all employment related laws, including laws related to working hours, wages, welfare and human rights and do not hire underage workers. We continually update and amend our policies to align it with global best practices and changes in relevant laws.

In addition to complying with these obligations, our employees' performance is appraised in a transparent manner. Employees are given opportunities to grow in their respective professions/ occupations.

eClerx also undertakes several employee-benefit and welfare initiatives like health awareness, entertainment, medical insurance, Family Medical cover including Covid care, death and accidental cover, ESOPs and reward and recognition in order to ensure that its employees work in a conducive and exploitation-free environment. We have dedicated Knowledge management team to train, upskill and reskill all our employees to realise their potential and learning aspirations. We do not bar employees from forming unions or participating in existing ones and do not keep their original documents or withhold any component of salary to create a bond.

Through these initiatives, eClerx has ensured that there is no scope for any instance of slavery, servitude or human trafficking.

Awareness and collaboration:

We have developed internal programs to raise awareness of issues such as slavery, forced or compulsory labour, exploitative practices by labour providers and human trafficking. We also have effective policies in place which ensure that no young person below the legal age is hired by eClerx for any work.

Supplier Adherence to our values and policies:

We require our suppliers to ensure they work in alignment with applicable policies, laws and also our values. We expect our suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare and human rights, social security and we have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chain and contractors comply with our values, we have in place, various governance policies as outlined above, which must be adhered to, by all suppliers who intend to do business with eClerx.

Though as mentioned above, the chances of non-compliances are limited and non-existent in nature owing to the limited supply chain structure and nature of our business, yet, the Group has also reviewed its supply chain to identify areas which may pose a higher risk of modern slavery and human trafficking and has already undertaken a number of measures to mitigate these risks. These include maintaining robust policies and procedures both for engaging new suppliers and monitoring existing suppliers to ensure that they meet both the requirements of the Act and the ethical values expected of them by the eClerx group.

Initiatives taken to ensure compliance:

eClerx is committed to ensuring no slavery or human trafficking in our supply chain. In this regard, we have taken the following steps to combat slavery and human trafficking:

- Stringent supplier engagement with detailed clauses to comply with the Modern Slavery Act, 2015.
- Obtaining confirmation from vendors and suppliers on compliance with respect to Modern Slavery Act, 2015.

We operate within an established and externally benchmarked corporate governance framework that is underpinned by our vision and values. Business must play its part. However, combatting modern slavery effectively requires improved traceability, increased transparency and collaboration between statutory agencies, civil society organisations and the private sector.

This statement was approved by the Board of Directors at its meeting held on August 13, 2021 and is signed by Mr. PD Mundhra

Digitally signed by
Priyadarshan
Mundhra
Date: 2021.08.13
18:58:40 +05'30'

PD Mundhra
Executive Director

August 13, 2021