

13 August 2024

MODERN SLAVERY ACT STATEMENT (“Statement”)

Financial Year Period: 2023 – 24

Background

ITC Infotech India Limited’s (“Company”/“ITC Infotech”) and its wholly owned subsidiaries’ (namely ITC Infotech Limited, UK and ITC Infotech (USA) Inc.) commitment to human rights focuses on subjects such as forced labour, slavery, child labour and human trafficking and thereby the Company and its wholly owned subsidiaries are committed to ensure that its personnel and suppliers across the globe take appropriate steps to mitigate the risk of human trafficking and slavery in any part of its business.

About the Company

ITC Infotech is a leading global technology services and solutions provider, led by Business and Technology Consulting. ITC Infotech provides business-friendly solutions to help clients succeed and be future-ready, by seamlessly bringing together digital expertise, strong industry specific alliances and the unique ability to leverage deep domain expertise from ITC Group businesses. The company provides technology solutions and services to enterprises across industries such as Banking & Financial Services, Healthcare, Manufacturing, Consumer Goods, Travel and Hospitality, through a combination of traditional and newer business models, as a long-term sustainable partner.

ITC Infotech is a wholly owned subsidiary of ITC Ltd. ITC is one of India's leading private sector companies and a diversified conglomerate with businesses spanning Consumer Goods, Hotels, Paperboards and Packaging, Agri Business and Information Technology. For more information, please visit: <http://www.itcinfotech.com/>

Introduction to the Statement

The Company has always been and is committed to exhibit, zero tolerance towards all facets of modern slavery, including slavery, servitude and forced or compulsory labour, human trafficking or exploitation in its businesses and supply chains, as elaborated under the Modern Slavery Act, 2015 of the United Kingdom (“Act”).

In enactment of this, this Statement is published pursuant to Section 54(1) of the Act elucidating the initiatives undertaken to eradicate the slavery and/or human trafficking from any part of the Company including its supply chains. This Statement sets out the steps that the Company and its wholly owned subsidiaries have taken to ensure that slavery and human trafficking is not taking place in its businesses or supply chains.

In this Statement, references to “slavery, servitude and forced or compulsory labour”, “human trafficking” and “exploitation” are as per the definitions set out in the Act.

This Statement pertains to the financial year of the Company as stated above. This Statement may be reviewed annually and updated as required.

The Company Policy

ITC Infotech strictly adheres to and complies with all employment related laws, including laws related to working hours, wages, welfare and human rights.

The Company operates within an established corporate governance framework that is underpinned by the Company’s vision and values. ITC Infotech is dedicated to creating a fair and transparent work environment with mutual respect for all.

The Company’s Code of Conduct reflects its commitment to act ethically and with integrity in all its business relationships, including dealing with people in the organization and relationships with suppliers, vendors and customers. The Code of Conduct is available on the Company’s intranet portal.

The Company expects that all those who work with and for it (“Transacting Party”), including without limitation, its personnel, supply chains and contractors, to read and comply with this Statement.

Non-adherence to comply with this Statement may result in disciplinary action, including dismissal, or termination of the contract or any other legal action against the Transacting Party.

The Company requires that non-adherence to this Statement to be immediately brought to the attention of the supervising manager or the relationship manager of the Transacting Party, who shall in turn, report the same to the undersigned.

The Company’s Code of Conduct strictly prohibits any discrimination, harassment or retribution, both personal and professional, towards the person reporting non-adherence.

Preventing Slavery and Human Trafficking in the Company’s Business and Supply Chains

ITC Infotech’s business is primarily information technology services. Any suppliers and partners which ITC Infotech engages with are specific to client requirements. ITC Infotech also obtains IT services and IT skilled resources from certain suppliers, who work with ITC Infotech and its clients’ teams for developing client required software and IT solutions.

ITC Infotech’s supply chains are integrally linked to its successful growth and works end-to-end to bring specific industry experience as well as a cross-industry perspective to help seed innovation. ITC Infotech is committed to ensure that there is no slavery or human trafficking in any part of the Company’s business including its supply chains.

The Company expects its suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare, human rights. The Company’s suppliers are

expected to work in accordance with applicable laws and policies and approach with regards to health, safety, environmental and people development objectives.

The Company provides every employee with a written employment contract and ensures that it complies with legal obligations relating to employment, pay, working hours, rest breaks, holidays and all due care is taken towards ensuring health and safety of employees and workers. The company also conducted training on Health and Safety for all UK based employees

The Company conducts appropriate checks on all employees, workers and all those who work with and for it as suppliers or service providers.

The Company does not employ any person below the statutory age nor does it use forced labour in any form.

The Company has a formal grievance framework to address and resolve any issues, concerns, complaints or grievance arising out of employment.

The Company's suppliers are required to assess their businesses and supply chains to comply with the Act.

In 2024, ITC infotech has formulated the Whistleblower Policy ("Policy") which is applicable to all directors and employees of the Company and its subsidiaries. It also applies to trainees, interns, contractors or subcontractors, employees, customers and suppliers / vendors of the Company and is available on ITC Infotech's internal portal. The policy provides guidance to employees to report suspected wrongdoing as soon as possible, with the knowledge that their concerns will be taken seriously and investigated as appropriate and ensure that their confidentiality will be respected.

In 2024, we have also formulated the Human Rights Policy ("Policy") which embodies our commitment to fairness, respect, and dignity and is available on ITC Infotech's internal portal. It promotes and protects human rights, focusing on equality, compliance with international standards, non-discrimination, and safeguarding vulnerable groups, including children and forced labor.

In August 2024, The Company has conducted training on Modern slavery Act to create awareness on the modern slavery act and to identify and mitigate the risk of human trafficking, slavery, servitude, and forced or compulsory labour in any part of the business. The company also circulated the Modern slavery Awareness booklet and factsheet related to recruitment .

Our ongoing efforts in creating awareness in the organization, and by implementing new policies, we are continuously striving to combat modern slavery in ITC Infotech India Limited and its subsidiaries.



Malliga Rajkumar

Chief Human Resources Officer

Authorised for and on behalf of ITC Infotech India Limited and its subsidiaries