



CYIENT AUSTRALIA PTY LTD

**MODERN SLAVERY POLICY
STATEMENT**

VERSION: 1.0

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Introduction

Cyient Limited and its related bodies corporate, subsidiaries and affiliated entities worldwide (henceforth jointly referred to as “Cyient”) are dedicated to protecting Human Rights and providing equal opportunity and to the preservation of business ethics.

Cyient prohibits all forms of modern slavery including all acts of human trafficking, forced or compulsory labour, slavery, forced marriage, servitude, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour, including situations where children are subjected to slavery or similar practices, or engaged in hazardous work, in its organisation, business operations, and supply chain in accordance with the **Modern Slavery Act 2015 (UK)** and the **Modern Slavery Act 2018 (Cth) (Australia)**.

Cyient explicates herein key initiatives that have been adopted to eliminate modern slavery and human trafficking from its organisation, business operations and supply chain. This policy statement sets out the steps Cyient is taking to ensure that slavery and human trafficking does not exist in its business operations or its supply chain.

Business Structure, Operations and Supply Chains

Business Structure

Established in India in 1991, Cyient provides engineering, geospatial, design-led manufacturing, and network and operational support services to global industry leaders, including many Fortune 500 clients. Cyient leverages the power of digital technology and advanced analytics capabilities, along with domain knowledge and technical expertise, to solve complex business problems across several industries, including aerospace and defence, industrial, medical, utilities, semiconductor, telecommunications, rail transportation, energy, mining and natural resources. Our 13,000 employees are located in more than 21 countries, supporting 12 industries, including aerospace, rail transportation, power generation, and telecommunications, digital and medical technology. With a sound track record of growth and profitability, we are committed to developing a sustainable society and actively promoting education and inclusive growth initiatives in our local communities.

Business Operations

Cyient is listed in on the National Stock Exchange and the Bombay Stock Exchange in India. Cyient is a global engineering and technology solutions company. It engages with customers across their value chain, helping to design, build, operate, and maintain the products and services that make them leaders and respected brands in their industries and markets. Customers draw on Cyient's engineering, manufacturing, and digital technology expertise to deliver and support their next-generation solutions that meet their competitive edge, highest safety, reliability, and performance standards.

Supply Chains

Cyient conducts due diligence and risk assessments throughout its supply chain to ensure the supplier performances align with applicable policies, laws, regulations, and Cyient corporate values. Cyient expects its suppliers to comply with all applicable laws and regulations relating to the services or supplies they are offering to Cyient, which will not be compromised or disregarded at any time.

Also, Cyient suppliers are expected to perform their services and provide supplies in accordance with Cyient policies, including the Cyient Vendor Code of Business Conduct, the codes of conduct supplied by Cyient's customers or clients as applicable, and any other policies in effect at the time of on-boarding or when subsequently updated from time to time.

Cyient trusts its suppliers are key stakeholders to succeed in its growth in the industry and provide end-to-end solutions or services to integrate specific industry experiences. Cyient, to fulfil its obligations to its customer or client, may take the initiative in supporting its suppliers through training and knowledge sharing by holding regular meetings to communicate clear expectations where required.

Relevant Cyient Business Policies

Cyient is committed to ensuring that slavery and human trafficking do not exist in any part of its business operations or supply chain. Cyient's internal processes and policies such as Corporate Social Responsibility Policy, Business Code of Conduct, Whistleblower Policy, and practices emphasising antislavery and human trafficking are a more significant part of the effort to ensure transparency, accountability, and protection of Human Rights are extended throughout its business operation and supply chain.

The policies mentioned above stipulate Cyient's ongoing commitment to protecting Human Rights, banning human trafficking, forced or compulsory labour, slavery, forced marriage, servitude, debt

bondage, deceptive recruiting for labour or services, and the worst forms of child labour, including situations where children are subjected to slavery or similar practices, or engaged in hazardous work, and also available on Cyient’s business website (<https://www.cyient.com/>).

In addition, Cyient attempts to work with the suppliers who agree to adopt the same high standards and have introduced to a new Cyient [Vendor Code of Business Conduct](#) that addresses labour practices and human rights explicitly, expressly requiring vendors to ensure that forced, bonded, or any other form of compulsory labour are prohibited within their supply chains. Furthermore, a signed declaration from them to this effect is procured prior to any formal engagement.

Cyient conducts regular site visits by management and undertakes annual opinion surveys with its employee community, which provides a mechanism for individual issues to be reported. Cyient also has an anonymous, confidential, external whistleblowing hotline through which specific concerns can be raised. Cyient plans to make its employee aware of red flags, which could signal issues relating to modern slavery and human trafficking and provide them with guidance on how they should respond if they identify any suspicious activity. Cyient considers these steps an appropriate response to the risks that it faces in relation to modern slavery and human trafficking. However, Cyient will continue to monitor this area with due vigilance and respond accordingly to any change in the level or nature of risks.

Cyient Corporate Core Values & Code of Principles

Cyient has established enduring relationships with global industry leaders by understanding their business needs, culture and core values. Their distinctive words describe our unique approach of working with its customers or clients to improve their business and the lives of their customers: **“Designing Tomorrow Together”**.

Cyient is guided by its corporate value **“FIRST”** (Fairness, Integrity, Respect, Sincerity, Transparency) principle across all stakeholder relationships, which is never ignored or compromised by the organisation and its leadership team.

Modern Slavery Procedure

As a leader in the implementation of the Modern Slavery Policy in Cyient, Cyient has established a Modern Slavery Procedure whereby its Modern Slavery Policy requirements are fulfilled in the following ways:

- ✓ Supply chain and Procurement Policy and Procedure
- ✓ Contractual terms through effective Contract management processes and monitoring key suppliers/offshore business partners regarding its Modern Slavery obligations.
- ✓ Risk assessment and Corporate Social Responsibility.

- ✓ Business operations including Human Resources – integrating Modern Slavery requirements into other policies; and
- ✓ Communications, Training, Engagement with a continuous augmentation approach to minimising the risk of Modern Slavery.

Evaluation to address Modern Slavery imperatives which are:

Conducting due diligence

Cyient expects its employees and suppliers to meet the provisions set out by Cyient policies and procedures and its Business Code of Conduct. Cyient policies reflect its intention to effectively foster human integrity and the complete removal of slavery and human trafficking.

Undertaking Complete Risk Evaluation

Cyient is undertaking an evaluation of risk in its supplier on-boarding processes to ensure that we identify areas where there is potential for modern slavery based upon the type of work performed. The policies in place that our procurement team follows to on-board suppliers includes the provision of the Cyient Vendor Business Code of Conduct which contains a policy prohibiting suppliers from engaging in any form of modern slavery and the supplier is obligated to acknowledge in writing compliance to this Vendor Code.

All employee-related policies and procedures of Cyient are transparent and available to all its employees. From time to time, Cyient updates and make necessary changes to the existing policies to align with the best practices globally and changes in relevant laws in the respective country.

Cyient has a multi-layer reporting structure for each employee and has processes of 360-degree feedback and employee satisfaction surveys (“ASAT”). Thus, every employee can give feedback on his/ her Reporting Managers, respective department/ function, and organisation as a whole. These feedbacks are taken on an annual basis and are shared with department/ function heads to be further disseminated. Departments/ functions are also rated based on such 360° feedbacks and ASAT.

All employees’ performances are appraised in a transparent manner and at face value. Employees are given equal opportunities to grow in their respective professions/ occupations.

Cyient undertakes several employee benefits and welfare initiatives like health awareness, entertainment etc., in order to ensure that employees work in a conducive and exploitation-free environment.

Cyient encourages its supply chain to ensure its organisation is free from slavery, servitude, or human trafficking. Cyient conducts a random audit on Suppliers to complete a performance risk evaluation to ensure suppliers are not violating the respective Modern Slavery Act or any other law that cannot be avoided or disregarded under their performance or obligations.

In the above manner, Cyient has ensured no scope for any instance of slavery, servitude, or human trafficking.

The Cyient internal stakeholders who will be responsible for ensuring the responsibility during the risk evaluation process

Governance

- ✓ The Corporate Governance team is responsible for administrating onshore and offshore employment and ensuring that an assessment of onshore and offshore employees and suppliers are conducted on their compliance under the Modern Slavery Act.
- ✓ The Corporate Governance team is responsible for preparing the Annual Modern Slavery Statement, supported by the Procurement Team.

Human Resources

- ✓ Human Resource is responsible for addressing modern slavery risks in the recruitment process, mainly when engaging with consultants and agencies recruiting personnel, contract workers, consultants, casual workers, interns and others.

Procurement

- ✓ The Procurement team is accountable for managing and sourcing activity, ensuring that an assessment of suppliers is conducted (where appropriate) on their compliance with the Modern Slavery Act.

Usefulness and Reporting

Cyient encourages and implemented a whistleblowing policy and process and a formal complaint framework that allows all Cyient employees, including contractors and suppliers, to raise their concerns through a single point of contact with complete confidentiality and strict policy to protect the interests of whistleblowers.

Additional Measures, Assessment and Monitoring

Cyient has taken additional measures to ensure no scope for any instance of slavery, servitude or human trafficking.

Responsiveness and collaboration

Cyient has developed internal programs to raise awareness of slavery, forced or compulsory labour, exploitative practices by labour providers and human trafficking. Cyient also has effective policies that ensure that Cyient for any activities hires no employees under legal age.

Developing a strong supply chain

Cyient requires its suppliers to align with applicable policies, laws, and Cyient core values. Cyient expects its suppliers to comply with all applicable laws and regulations relating to working hours, wages, welfare, human rights. Cyient makes available to the suppliers its policies such as the Code of Business Conduct, which is implemented to lay the foundation for strong corporate governance.

All Cyient suppliers are expected to work according to Cyient attitude and approach regarding health, safety, environmental and people development objectives. In this regard, Cyient believes in supporting its suppliers through training and knowledge-sharing and hold regular forums to communicate clear expectations.

Corporate governance framework and structure

Cyient operates within an established and externally benchmarked corporate governance framework reinforced by Cyient vision and core values. An essential function of our corporate governance framework is the Identify, Manage and Mitigate Risks imposed on all key internal stakeholders, including employees under the existing work environment of Cyient. Cyient is committed to creating a fair, reasonable, and transparent work environment with mutual respect and importance to all.

The Corporate Ombudspersons are primarily responsible for administrating and managing issues and concerns within the organisation. The Corporate Ombudspersons ensure that the company and its employees comply with all internal Cyient policies and procedures.

Any employee can raise a complaint with the Corporate Ombudspersons or by using the external confidential reporting hotline listed below:

Website - using the link <https://www.lighthouse-services.com/cyient>

E-Mail: <mailto:Ombudsperson@cyient.com> (will be received by Ethics Helpline Team only)

Phone: Please refer to Annexures 1 and 2

Annexure-1

Contact Details of the Ombudspersons

| APAC including India | EMEA | NAM |
|---------------------------------------|-------------------------------|-------------------------------|
| Rajendra Velagapudi | John Renard | Thomas Edwards |
| Head of Operations for DLM | President, EMEA | President, Cyient Inc. |
| Tel.: + 91 40 67641810 | Tel.: +44 20 7343 1404 | Tel.: +1 860 528 5430 |
| Mobile: + 91 96765 66640 | Mobile: +44 7973 116296 | Mobile: +1 203-648-0578 |
| Email: Rajendra.Velagapudi@cyient.com | Email: John.Renard@cyient.com | Email: Tom.Edwards@cyient.com |

Annexure-2

Lighthouse Services

Toll-Free Number: 800-603-2869