Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Cyient Europe Limited’s (CEL) anti-slavery and human trafficking statement for the financial year 2020. It is important to note that this statement should be read in the context of CEL's:

- Corporate Social Responsibility Policy
- Code of Business Conduct
- Annual Report

CEL operates across Europe providing highly skilled engineering services to telecommunication, gas, electric and water utility companies, public sector agencies, and commercial businesses. In addition, it provides engineering services as well as big data and analytics capabilities to rail, aerospace, and manufacturing companies.

CEL’s Code of Business Conduct outlines its commitment to stakeholders, clients, and employees and provides a clear set of standards for all its professional endeavors. All CEL’s dealings across its relationships are guided by its core values: Fairness, Integrity, Respect, Sincerity, and Transparency. CEL conducts its business in accordance with the highest ethical standards and adheres to all applicable employment, health and safety, and human rights laws. As such, it has established, implemented, and maintained an EOHS Management System in accordance with ISO 14001:2004 and BS 18001:2007 standards. This framework helps CEL identify and control health and safety risks, prevent accidents, aid legislative compliance, and improve overall performance, thereby ensuring a safe and healthy work environment.

CEL is committed to ensuring that slavery and human trafficking do not exist in any part of its business or supply chain. A recent review of its employment practices and supplier relationships in light of the requirements of the Modern Slavery Act 2015 did not reveal any circumstances in which CEL employees or suppliers could be exposed or subjected to modern slavery or human trafficking in any form. We have very few suppliers and have assessed our risk levels to be low in this area, given the European legislative context within which we operate. Nevertheless, we only work with suppliers who agree to adopt our same high standards and have introduced a new Vendor Business Code of Conduct that specifically addresses labour practices and human rights, expressly requiring vendors to ensure that forced, bonded or any other form of compulsory labour are prohibited within their own supply chains. Furthermore, a signed declaration from them to this effect is procured prior to any formal engagement.

We conduct regular site visits by management and undertake annual opinion surveys with our employee community, which provides a mechanism for individual issues to be reported. We also have an anonymous, confidential, external whistleblowing hotline through which specific concerns can be raised. We plan to make our associates 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.

We consider these steps a proportionate response to the risks that we face in relation to modern slavery and human trafficking. However, we will continue to monitor this area with due vigilance and will respond accordingly to any change in the level or nature of risks.

John Renard
President—Cyient Europe Ltd.