

Slavery and Human Trafficking Statement

January 2019 – December 2019

1 Financial year

1.1 This slavery and human trafficking statement relates to the company's financial year beginning 1st of January 2019 and ending 31st of December 2019. To keep the information as up to date as possible, we have also included work from the current financial year starting with 1st of January 2020.

2 Our practices to combat slavery and human trafficking

2.1 We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our supply chains and in our business.

2.2 In 2019 as a group we have:

- (a) continued the implementation of the action plan developed in 2016;
- (b) appointed solicitors to assist the group with our compliance with the UK Modern Slavery Act 2015 ("Modern Slavery Act");
- (c) maintained our internal team to work on modern slavery issues comprising members of the Legal and Compliance and Vendor Governance Framework groups;
- (d) updated our existing policies to include reference to the Modern Slavery Act;
- (e) maintained an Anti-Slavery Policy;
- (f) maintained a Critical Incident Response Plan;
- (g) trained key personnel on the requirements of the Modern Slavery Act and our standard approach;
- (h) updated standard modern slavery wording for our supplier terms and conditions; and
- (i) updated our supplier due diligence questionnaire related to the Modern Slavery Act.

In 2020, we have continued the implementation of the action plan and the remaining ongoing activities in order to ensure continuous compliance.

2.3 It is our policy to conduct all business ethically and in accordance with the UK Government's Modern Slavery Strategy, as amended from time to time, and as outlined in the UK Home Office Guidance "Transparency in Supply Chains: a Practical Guide" first published on 29th of October 2015 and updated on 22nd October 2018 and on 18th December 2019.

2.4 We are committed to acting ethically in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter slavery and human trafficking.

2.5 We understand that we are covered by the Modern Slavery Act because:

- (a) we are a body corporate;
- (b) we carry on business in the UK;
- (c) we supply services; and
- (d) have a turnover of over £ 36 million per year, namely £ 2,104,700,059.41 million.

3 Organisation's structure

- 3.1 Genpact (UK) Ltd. was incorporated in 2001 and is based in London, United Kingdom. Genpact (UK) Ltd operates as a subsidiary of Genpact Limited (together with its direct and indirect subsidiaries, "Genpact" or the "Genpact Group"), a Bermuda company whose shares are publicly traded on the New York Stock Exchange. Genpact is a global professional services provider of business support services focusing on technological innovation and digital transformation.
- 3.2 As a member of the Genpact Group, Genpact (UK) Ltd. provides business services to international customers, including collections, finance and accounting, industrial solutions, IT managed services, master data management, IT infrastructure services, supply chain management.
- 3.3 The turnover of Genpact (UK) Ltd. and its subsidiary undertakings in the financial year ending 31st of December 2019 was £ 2,104,700,059.41.

4 Our business

- 4.1 Genpact is a global professional services firm that makes business transformation real. We drive digital-led innovation and digitally-enabled intelligent operations for our clients, guided by our experience running thousands of processes primarily for Global Fortune 500 companies. We think with design, dream in digital, and solve problems with data and analytics. Combining our expertise in end-to-end operations and our AI-based platform, Genpact Cora, we focus on the details – all 90,000+ of us. From New York to New Delhi and more than 30 countries in between, we connect every dot, reimagine every process, and reinvent companies' ways of working. We know that reimagining each step from start to finish will create better business outcomes. Whatever it is, we'll be there with you – accelerating digital transformation to create bold, lasting results – because transformation happens here.

5 Our suppliers and supply chains

- 5.1 Most of Genpact UK Limited's suppliers are based in Europe. We also receive services (such as technology, digital and business process services) from other members of the Genpact Group.

Our main suppliers are:

- (a) software companies (international, mostly Europe and US) that provide software that we embed into our products;
- (b) subcontracting companies (international) that provide sub-contracted human resources on customer projects;
- (c) IT infrastructure suppliers (international);
- (d) facilities infrastructure suppliers (international); and
- (e) ancillary administrative services (Legal, Professional consultancy, Travel services etc.).

6 Our policies on slavery and human trafficking

- 6.1 We are committed to ensuring that there is no 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 is not taking place anywhere in our supply chains.
- 6.2 Moreover, our current global supplier policy, Business Associate Integrity@Genpact – Guide to our Policies, specifically forbids any type of modern slavery or human trafficking in our supply chains or in any part of our business.

7 Due diligence processes for slavery and human trafficking

- 7.1 As part of our initiative to identify and mitigate risk, we have requested to our suppliers to sign up to a code of practice and to respond to a UK Modern Slavery Act Questionnaire, as part of our process to engage with any new supplier.
- 7.2 Our Anti-Slavery Policy is a first step towards the company having in place systems to:

- (a) identify and assess potential risk areas in our supply chains;
 - (b) mitigate the risk of slavery and human trafficking occurring in our supply chains;
 - (c) monitor potential risk areas in our supply chains; and
 - (d) protect whistleblowers.
- 7.3 Genpact has constituted a formal Risk Council in 2016. The Risk Council reviews the Genpact Group's overall risk profile periodically and reports the key business risks to the board of directors of Genpact Limited. The Enterprise Risk Management Office is headed by the Enterprise Risk Management Leader who is responsible for ongoing maintenance of Enterprise Risk Management at Genpact. Annually, an enterprise wide risk assessment is conducted and risks to the organization are identified and assessed on the likelihood and impact scale. Changes in the regulatory and legal environment, such as the Modern Slavery Act, and the criminal and societal issues which those changes aim to address, which could have an impact on the organization are also subject to the regular risk assessment activity.
- 7.4 We have been releasing bi-annual sustainability communications since 2008. While the earlier communications were based on the 10 principles of the United Nations Global Compact, we started reporting on sustainability performance using the more comprehensive Global Reporting Initiative Framework in 2011. These regular reports provide a holistic picture of our organisation's performance, covering environmental, social, and ethical criteria in addition to economic data which includes also our supply chain. The 2017 report is available on Genpact's website (<https://www.genpact.com/downloadable-content/genpact-sustainability-report-2017.pdf>).

8 Supplier adherence to our values

- 8.1 To ensure all those in our supply chain and contractors comply with our values and ethics we have designed and rolled out a supply chain compliance programme.
- 8.2 We have a group of dedicated resources from the following departments:
- (a) Legal and Compliance;
 - (b) Audit;
 - (c) Vendor Governance Framework;
 - (d) Enterprise Risk Management;
 - (e) Human resources; and
 - (f) Sourcing.
- 8.3 The team reports to Sharon Thomas who has overall responsibility for the company's response to the challenge of slavery and human trafficking and in accordance with the requirements of the Modern Slavery Act has signed this statement below.

9 Effectiveness

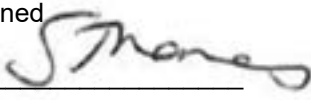
- 9.1 We consider that the steps we have been taking are effective in ensuring that slavery and human trafficking is not taking place in our business or supply chains, as so far we haven't identified any incident that could affect the achievement of our objectives. As part of our plans for the current financial year, we will continue to monitor the effectiveness of the actions taken and will ensure that our strategy is responsive to any potential risks.
- 9.2 As a confirmation of Genpact's commitment to leading with integrity and prioritizing ethical business practices, Genpact was first named one of the World's Most Ethical Companies on February 12th, 2018 and was named for the second year in a row in 2019 by the Ethisphere Institute, a global leader in defining and advancing the standards of ethical business practices. The Ethisphere list can be viewed at <https://www.worldsmostethicalcompanies.com/past-honorees/>. Our press release relating to the naming can be viewed at: <http://www.genpact.com/about-us/media/press-releases/2018-genpact-named-one-of-the-2018-worlds-most-ethical-companies-by-the-ethisphere-institute>.

10 Training

- 10.1 To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided training to the following groups:
- (a) Legal and Compliance;
 - (b) Vendor Governance Framework;
 - (c) Sourcing; and
 - (d) HR.

This Slavery and Human Trafficking Statement has been approved by the Board of Directors of Genpact (UK) Limited on July 2nd, 2020.

Signed



Director

Name: Sharon May Thomas

GENPACT UK LIMITED

Date: July 2nd, 2020