

Human Rights Policy

Region/Country: Global

Effective Date: New Policy

Supersedes:

Dated:

Scope

Conduent Business Services, LLC and its subsidiaries (hereafter referred to as “Conduent”) provide this policy as a guide for associates. This policy applies to all associates of Conduent and any reference hereafter to Conduent is a reference to Conduent Business Services, LLC and its subsidiaries. This policy applies to associates globally and is also applied to all current and potential suppliers and partners of Conduent. Each country in which we operate may provide supplemental policy and implementation guidance as is required by local or regional law.

Summary

This policy establishes uniform standards for the recognition and protection of human rights, which are the foundation upon which business, community and broad economic success are realized. The policy incorporates Conduent’s commitment to stakeholder engagement by seeking to include the input of key investors in the evaluation of the policy.

Definitions

Human Rights: are the fundamental rights, freedoms and standards of treatment to which all people are legally entitled.

Human Trafficking: the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labor: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty. This includes debt, bondage, and indentured labor.

Child Labor: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

Policy

I. Respect for Human Rights

Conduent conducts its global business with great respect for human rights. This Policy adheres to the UN Guiding Principles on Human Rights and the International Bill of Rights, including the United Nations Universal Declaration of Human Rights and the two international covenants. In addition, we commit to uphold the OECD Guidelines for Multinational Enterprises and human rights principles established in the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. This is a zero tolerance policy for any violation of basic human rights relative to our business operations. These activities include all topics discussed in this Policy including but not limited to:

Conduent Internal Use Only

CONDUENT GLOBAL ETHICS HELPLINE www.conduent.com/ethicshelpline or 844-330-0221

Conduent Ethics Program Internet Site: www.conduent.com/ethics

Region/Country: Global

Effective Date: New Policy

Supersedes:

Dated:

Human Rights Policy

- Using involuntary prison labor
- Engaging in any form of slavery
- Destroying, concealing, confiscating, or otherwise denying access by an associate to the associate's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Using misleading or fraudulent recruitment practices, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of associates regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the associate, and, if applicable, the hazardous nature of the work.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.
- Charging applicants/candidates recruitment fees.
- Providing or arranging housing that fails to meet the host country housing and safety standards

Conduent will take appropriate disciplinary action for violations of these rules, up to and including termination of associates, subcontractors, and third-party representatives acting on behalf of the Company. Conduent will cooperate with the U.S. Government or other appropriate governmental authorities in audits or investigations relating to such violations. Associates of Conduent are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy.

II. Community Impact

The Company recognizes its impact on the communities in which it operates. Conduent is committed to engaging with stakeholders in those communities to ensure that the Company understands their views and to acquiring the Free, Prior, Informed Consent (FPIC) of indigenous communities where necessary. Where appropriate, we will engage in dialogue with community stakeholders on human rights issues related to our businesses. To the extent possible and feasible, we strive to address local issues at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

III. Diversity and Inclusion

The Company values the diversity and inclusion in the workplace. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We prohibit discrimination and harassment on the basis of race, sex, color, national or social origin, religion, age, disability, sexual orientation, gender identity and expression, or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation and advancement at the Company is qualifications, performance, skills and experience. Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to Conduent associates but also to the

Conduent Internal Use Only

CONDUENT GLOBAL ETHICS HELPLINE www.conduent.com/ethicshelpline or 844-330-0221

Conduent Ethics Program Internet Site: www.conduent.com/ethics

Region/Country: Global

Effective Date: New Policy

Supersedes:

Dated:

Human Rights Policy

business partners with whom we work.

IV. Freedom of Association and Collective Bargaining

The Company respects our associates' right to join, form or not to join a labor union or Works Council without fear of reprisal, intimidation or harassment. Where associates are represented by a legally recognized union or Works Council, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

V. Safe and Healthy Workplace

The Company provides a safe and healthy workplace and complies with applicable safety and health laws, regulations and internal requirements. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks. We are committed to engaging with our associates to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

VI. Workplace Security

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for associates are provided as needed and will be maintained with respect for associate privacy and dignity.

VII. Forced Labor and Human Trafficking

The Company unconditionally prohibits the use of all forms of Forced Labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of Human Trafficking.

VIII. Child Labor

The Company prohibits the use of Child Labor and will not hire individuals that are under eighteen (18) years of age. Moreover, it is our policy not to work with any supplier or contractor that is linked in any way to child labor and we will continue to monitor suppliers and contractors for continued adherence to this policy. Any suspected use of child labor will be thoroughly investigated to determine credibility of the allegations

IX. Work Hours, Wages and Benefits

The Company compensates associates competitively relative to the industry and local labor market and in keeping with its business needs. We comply with all applicable wage, work hours, overtime and benefits laws. Furthermore, we commit to provide a fair and livable wage to all associates paid in legal tender at regular intervals and workers shall enjoy a rest period of at least 24 consecutive hours every seven days

Conduent Internal Use Only

CONDUENT GLOBAL ETHICS HELPLINE www.conduent.com/ethicshelpline or 844-330-0221

Conduent Ethics Program Internet Site: www.conduent.com/ethics

Human Rights Policy

Region/Country: Global

Effective Date: New Policy

Supersedes:

Dated:

X. Reporting Requirements

Associates having knowledge of credible information concerning actual or potential violations of this policy must report them immediately. Timeliness of reporting any suspected violation is critical as the U.S. Government has imposed an especially stringent reporting obligation when there is credible information of violations. Failure to report actual or potential illegal behavior or actual or potential violations of this policy may also subject associates to disciplinary action, up to and including termination of employment.

Conduent has many channels available to receive reports of possible violations of policy. However, given the immediacy of our notification requirements to the U.S. government, possible violations of this policy should be reported directly to the Ethics Helpline. Associates may also report possible violations to line management, Human Resources, compliance professionals throughout the organization, and the General Counsel. Any person who receives reports of possible violations under this policy must notify the Ethics Helpline. When making a report, associates are encouraged to share as much information as possible so that appropriate action can be taken.

XI. Non-Retaliation Policy

Conduent does not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or governmental audit or investigation. Any associate who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.

XII. Training

As part of its mandated annual associate training, Conduent includes training to help associates recognize and report human trafficking and other human rights violations. In addition, Conduent will provide additional training to members of its global team, who are tasked with communicating this policy to our global suppliers.

Responsibilities

Every associate, subcontractor, and third-party representative acting on behalf of the company is responsible for ensuring compliance with this policy.

Potential and Actual Human Rights Impacts

We will conduct risk assessments and audits in our own operations and throughout our value chain on actual and potential human rights impacts. If negative impacts are discovered in our due diligence, we will seek to remedy those impacts and conduct follow-up audits to ensure corrective actions have taken place. The company will pay especially close attention to industry-specific exposure to human rights impacts.

Region/Country: Global

Effective Date: New Policy

Supersedes:

Dated:

Human Rights Policy

Risk Assessments and Audits

Conduent requires selected suppliers and business partners to complete a self-assessment focused on labor practices, human rights, worker health and safety, environmental management and business integrity. Risk factors considered in the selection of suppliers include geographic risks, industry-associated risks and criticality to our operations. The company will evaluate the level of risk associated with each supplier or partner and determine the need to conduct a compliance audit. When a supplier is assessed as high risk, a third-party audit of their facility is required.

Monitoring and Verification

Conduent maintains the following procedures to monitor and seek external verification in our own sites and our suppliers' regarding workplace conditions and human rights practices:

- [Number or percentage of sites verified and description of third-party responsible for verification]
- [Description of compliance mechanisms for suppliers and partners]
- [Description of audit procedures adopted or to be adopted, including extent and timeframe]

Suppliers

In order to enshrine our commitment to supply chain transparency, Conduent takes, and will continue to take the appropriate steps to ensure our suppliers and partners that are located in high-risk locations and/or that may be more exposed to human trafficking risk due to the nature of the industry in which they operate adopt relevant measures to mitigate such risks.