



## UK Modern Slavery Act Statement

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 enacted in the United Kingdom. It sets out the steps taken by Conduent Business Process Solutions Limited during the financial year ending 31 December 2022 to prevent modern slavery and human trafficking in its business and supply chains.

This Statement has been approved by the Directors on 30 May 2022.

### **Conduent Business and Supply chain**

Conduent Group is a large international organization. At the top of the organizational chain is Conduent Incorporated, a publicly listed company trading on the New York Stock Exchange with a symbol CNDT. Conduent Incorporated is an indirect shareholder of the Conduent Business Process Solutions Limited and all its subsidiaries.

Conduent is a global enterprise and leading provider of business process services with expertise in managing operations involving high volume, repeatable and individualized interactions. The Company's portfolio covers both front office and back office operations; however, the majority of its revenue and differentiation derives from engagements where it serves on behalf of its clients to manage end-user interactions across a wide-range of domains. Examples include payments, collections, benefit administration and end-user communication services. The Company creates value for its commercial and government clients through more efficient service delivery combined with a personalized and seamless experience for the end-user. The Company applies its expertise, technology and innovation to continually modernize its offerings for improved customer and constituent satisfaction and loyalty, increase process efficiency and respond rapidly to changing market dynamics.

Conduent recognizes that having a diverse Supplier Pool is a major competitive advantage and powerful business tool. Conduent strives to proactively identify, build relationships with and purchase goods and services from diverse and small businesses that can help meet our clients' expectations and achieve our corporate goals and objectives.

Conduent's supply chain operations are extensive and global, including sourcing goods and services to fulfill the needs of Conduent client requirements from a wide range of suppliers. Goods and Services are also procured from suppliers to support Conduent's customer services and internal business operations.



Conduent conducts its global business with great respect for human rights. Our policy governing human rights is principally guided by the United Nations Universal Declaration of Human Rights. In addition, our relationships with our people are guided by human rights principles established in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We have no tolerance for any violation of basic human rights relative to our business operations.

Consistent with the principles of the United Nations Universal Declaration of Human Rights Conduent is committed to freely chosen labor and supports efforts to eradicate human trafficking. Our support for these principles is embedded in our global policies as well our [Code of Business Conduct](#) which applies to those who do business on Conduent's behalf, as well as to all Conduent employees.

Information regarding a potential violation of Conduent's anti-human trafficking policy, whether by a Conduent employee subcontractor or agent, must be promptly reported to a Conduent manager or the Conduent [Ethics Helpline](#). Individuals aware of potential human trafficking violations also may contact the Global Human Trafficking Hotline directly at 1-844-888-3733 (in the United States) or [help@befree.org](mailto:help@befree.org), or may contact the Modern Slavery Helpline at 0800 0121 700 (in the United Kingdom). If a specific case of potential modern slavery is identified in the United Kingdom, it should be immediately reported to the police on 101. If potential victims are in immediate danger, the standard 999 emergency number should be used.

In addition, Conduent has vigorous processes and policies set up to prevent modern slavery of all forms, across all its departments and global networks.

## **1. Supplier relations and controls**

In order to strengthen our approach to supplier-facing sustainability and human rights actions, Conduent has rolls out a Supplier Code of Conduct on corporate social responsibility annually to our suppliers. The Supplier Code of Conduct includes Conduent's stance on the principles of international labor and human rights.

The following also highlight our efforts to ensure the absence of slavery and human trafficking from our supply chain:

### **1.1 Verification**

- All Conduent Global Procurement Contracts have language in adherence to the United States FAR Rule 52.222-50. The contract language addresses prohibiting severe forms of human trafficking, procurement of commercial sex acts, and the use of forced labor when



acting as a sub-contractor supporting Conduent working on U.S. Government Contracts.

- All Suppliers are required to go through a risk assessment process, that is governed by policies for sourcing, financial, technical, operational, data privacy and security controls. The risk assessment review is conducted by a cross-functional team that includes representatives from Conduent Global Procurement, Risk Management, ISO and Data Privacy teams, Suppliers' financial condition, technical and operational capabilities, access to data, security controls and policies are included as part of the assessment.
- Conduent has a standard process to manage supplier contract termination. Conduent monitors Third Party performance through its Vendor Management and Governance (VM&G) Program. The VM&G Program includes quarterly business reviews, periodic audits and monitoring of performance scorecards and dashboards. Performance measurements for each contract are designed to reflect the unique services and contractual terms governing each supplier relationship.

## **1.2 Audit**

As noted above, the Conduent VM&G Program provides for periodic audit or review of suppliers:

- Conduent includes terms and conditions in all of its subcontracts relating to compliance with applicable laws, regulations and policies. Additionally, as part of the Conduent VM&G Program, Conduent performs supplier audits to monitor supplier compliance with such terms.
- Conduent assesses service level credits relating to missed service levels. Service level credits are measured and calculated based upon the criticality and severity of missed service levels. Conduent typically includes termination rights in its supplier contracts relating to compliance gaps and breach of contract.
- On-site supplier audits and reviews are structured based upon the particular subcontractor services and contractual terms.
- Issue and dispute resolution processes are established in the respective contracts and conducted as part of the Conduent VM&G Program.
- The supplier performance monitoring and feedback process is customized based upon the particular supplier. Typically, we conduct



supplier operational reviews on a monthly basis and overall supplier business reviews on a quarterly basis.

### 1.3 Certification

- Conduent requires all suppliers to comply with the Conduent Supplier Code of Conduct, as well as represent and warrant their compliance with all applicable laws and regulations concerning the products and/or services procured by Conduent in Conduent's standard procurement agreements and purchase orders.
- If it comes to the attention of Conduent that a supplier has violated applicable laws or contract terms, Conduent will analyze each situation on a case by case basis and will determine the necessary course of action (for example, instruct the supplier to take corrective actions or terminate the supplier relationship).

## 2. Internal Accountability

- The [Conduent Ethics and Compliance Program](#) is an integral part of our daily business operations and practices. Conducting business with the highest degree of ethical integrity is the job of every employee at Conduent. To facilitate this commitment to integrity we have:
  - A global, written code of business conduct
  - A supplemental code of conduct for finance employees
  - A specific code of conduct for the board of directors
  - A dedicated Conduent Ethics Helpline to receive questions and complaints, which is accessible from anywhere in the world at any time, and a strictly enforced 'no retaliation policy' to promote comfort in using the Helpline.
  - An Ethics & Compliance Governance Board comprised of senior executives representing all areas of Conduent business
  - Annual distribution of the Global Ethics Policy and CEO message on ethics and integrity to all employees
  - Code of conduct training required of all employees, including senior management
  - An annual ethics certification process that includes all senior managers and officers
- The Conduent Ethics and Compliance Program is overseen by the Audit Committee of the Board of Directors. The Ethics Office reports directly to the General Counsel and Secretary via Conduent's Chief Ethics Officer, with ongoing reporting responsibilities directly to the Audit Committee. The General Counsel and Secretary reports directly to Conduent's CEO.



- Conduent's [Code of Business Conduct](#), applies to all Conduent employees and those who do business on Conduent's behalf, including agents, representatives and independent contractors. The Code of Business Conduct is designed to help align actions and decisions with the Company's operating principles and business ethics policies. Conduent promptly addresses and determines appropriate corrective actions on all policy and practice violations.
- Conduent offers a variety of channels for employees, suppliers and customers to receive guidance regarding ethics and compliance issues and to report suspected ethical violations. These channels include the [Ethics Helpline](#) and [Internet reporting](#)

### 3. Training

- Ethics training covering the Code of Business Conduct is required for all employees. The training is designed to enhance employees' understanding of Code of Business Conduct and their ability to recognize and respond to ethical issues. The training course communicates the process and expectations about reporting suspected violations of the Code of Business Conduct and provides instructions for obtaining additional guidance should employees have questions or concerns about Conduent ethics procedures.
- Additionally, a Supply Chain Transparency Course was made available to all employees during the 2021 year. The training is designed to aid in the mitigation of human trafficking by building awareness of how human trafficking and slavery manifest themselves in the supply chain.

For more information about supplier relations and governance at Conduent, please visit the [Conduent Supplier Relations](#) site.

Signed

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*Richard Frow*

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Vice President, Conduent