

Human Rights Policy

Region/Country: Global

Effective Date: April 1, 2024

Supersedes: Human Rights Policy

Dated: February 1, 2017

Scope

Conduent Incorporated, LLC and its subsidiaries (“Conduent” or the “Company”) provide this policy as a guide for associates. This policy applies to all Conduent associates.

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. This policy incorporates Conduent’s commitment to stakeholder engagement by seeking to include the input of key investors and other stakeholders in the evaluation of this policy.

Definitions

Human Rights: 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: Labor 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

It is the policy of Conduent to conduct its business with appropriate respect for:

I. 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:

- 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.

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- 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 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 business partners with whom we work.

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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 in all material respects 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 associates shall enjoy a rest period of at least 24 consecutive hours every seven days.

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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 and Compliance Helpline website or via phone (in US, Canada and Jamaica call (844) 330-0221. Additional country phone numbers can be found in the Ethics Grievance Directory) 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 and Compliance 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 provides additional training to members of its global team, who are tasked with communicating this policy to our suppliers.

Responsibilities

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

I. 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 suppliers to 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.

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II. Potential and Actual Human Rights Impacts

Conduent will conduct risk assessments and audits in its own operations and throughout its 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.

III. 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.

IV. Exceptions

Within the boundaries of each policy there may be 'allowable' exceptions, and where this is the case the policy owner (e.g. Global Leader, Compensation for the Compensation Policy) will oversee and grant the exception subject to approval of the Global Head of Human Resources.

Without the necessary approvals, no exceptions may be made to the existing HR policy nor granted to specific individuals. Any other exception would be classified as unauthorized and would be considered a policy violation. Where a policy exception is made without the appropriate approvals disciplinary action, up to and including termination may be taken against the associate(s) who authorized the exception.

Oversight

I. Board Oversight

The Board of Directors of Conduent (the "Board") is responsible for overseeing the management of the Human Rights Policy and strives to ensure an appropriate balance between human rights responsibility and Conduent's business goals. Conduent's human rights performance are overseen by the Board's Corporate Social Responsibility (CSR) and Public Policy (PP) Committee. The CSR and PP Committee assist the Board in reviewing of the company's material environmental, social, and corporate governance (ESG) strategies, initiatives, investments and policies.

II. Management

ESG Steering Committee (SteerCo) Purpose

SteerCo is a cross-functional management committee at Conduent that provides input and guidance on ESG strategy, initiatives and policies, stakeholder communications and macro/micro developments related to ESG.

- The additional purpose of the SteerCo is to support and provide guidance to Conduent's the Board of Directors (the "Board") regarding the Company's ongoing commitment to environmental, corporate social responsibility, health and safety, corporate governance, other non-financial risks and opportunities, and other public policy matters relevant to the Company (collectively "ESG Matters").

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SteerCo Duties and Responsibilities

- Coordinate with the CEO and the Management Operating Team on incorporating ESG matters into Operating Unit strategies.
- Set strategy, long-term targets, and budget for ESG Matters company wide.
- Oversee/provide guidance on environmental, health & safety issues, climate change, social, and public programs, policies, practices, partnerships, activities, and goals to ensure compliance, consistency, and impact on corporate strategy.
- Oversee progress on key sustainability targets and related initiatives and provide advice on how to improve performance.
- Maintain oversight of communications on ESG Matters.
- Consider and bring attention regarding current and emerging ESG Matters to Management Operating Team, the CSR and PP Committee and the Board.
- Advise management on stockholder proposals and share concerns related to ESG Matters.
- Review the sustainability strategy, policies, practices, and disclosures for consistency.
- Integrate ESG Matters into strategies, policies and practices, compliance related to health and safety incidents/laws, emerging issues, inspection audits, and corrective action reports.
- Assist management in overseeing internal and external communications with associates, investors, and other stakeholders regarding the Company's position on or approach to ESG Matters, including the coordination and review of, as appropriate, draft responses, corporate social responsibility reports, or other disclosures to stakeholders.

SteerCo Members and Chair

Members of SteerCo shall be approved by the ESG Practice Lead as the responsible body to manage and coordinate the sustainability process. It reports to the CSR and PP Committee.

- Chief Communications Officer, Chair
- Legal
- Diversity and Inclusion
- Real Estate
- Procurement
- Human Resources
- Risk Management
- Operations
- Additional members, as necessary

SteerCo Structure, Operations, Cadence and Annual Calendar

- SteerCo shall meet monthly with additional meetings, as necessary.
- SteerCo will report to the Board's CSR and Public Policy Committee quarterly on ESG Matters
- SteerCo will provide ongoing direction to an internal tactical team, (SME Task Force) to ensure appropriate integration of ESG Matters into corporate strategy and monitor goals and progress.

Forms/Exhibits

Conduent's Corporate Responsibility [Page](#).

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Conduent Ethics and Compliance Helpline

Contact Conduent’s Ethics and Compliance Helpline if you have questions or to report a concern about potential unethical or noncompliant conduct.

- For online reporting visit www.conduent.com/ethicshelpline.
- By phone in US, Canada and Jamaica call (844) 330-0221. Additional country phone numbers can be found in the [Ethics Grievance Directory: www.conduent.com/ethicshelpline](http://www.conduent.com/ethicshelpline)
- For traditional mail use: Conduent Ethics and Compliance Office, 100 Campus Drive, Suite 200, Florham Park, NJ 07932

Revision History

Date	Description
February 1, 2017	New Policy
April 9, 2021	Updated
April 1, 2024	Updated