

AXON SOLUTIONS LIMITED SLAVERY AND HUMAN TRAFFICKING STATEMENT

Axon Solutions Limited. (hereafter “**AXON**” or the “Company”) is committed to making significant and long-lasting improvements to workers' employment, workplace conditions, systems and processes related to its operations by being committed to complete eradication of Human trafficking, child labour, forced labour in its entire supply chain.

This statement is to meet **AXON's** obligation to comply with section 54(1) of the Modern Slavery Act, 2015 guided by the UN Universal declaration of Human Rights and conventions of the International Labour Organizations (ILO) focusing on zero tolerance to Human trafficking, bonded labour, child labour, Slavery and servitude.

This statement is published emphasising our compliance and adherence in every aspect to the Modern Slavery Act, 2015 in our operations including but not limited to procurement processes, policies and procedures, employee practices and business management.

ORGANISATION'S STRUCTURE

Axon Solutions Limited is a group company of HCL Technologies Ltd. (“HCL”) and is trading entity of HCL operating in the UK and Ireland.

HCL offers an integrated portfolio of products, solutions, services, and IP around Digital, IoT, Cloud, Automation, Cybersecurity, Analytics, Infrastructure Management and Engineering Services, amongst others, to help enterprises reimagine their businesses for the digital age.

OUR SUPPLY CHAINS

Our operations are supported by a global supply chain for goods and services. This supply chain includes suppliers of goods, technology related products and services, software and skilled labour.

In the Financial Year 2018 – 2019, AXON made payment of USD **3,359,472** to entities / organisations, comprising our supply chain.

HCL's contracts with all suppliers explicitly cover aspects relating to the adherence to Modern Slavery Act 2015. We expect all our suppliers to comply to the provisions laid out in the act to ensure that all facets of human integrity are upheld, thereby aiding in eradicating Human trafficking. We would also like to strongly uphold that we have zero tolerance for non-adherence to this aspect and any act of violation reported shall be duly acted upon as per the prevailing legislations.

OUR GOVERNANCE AND POLICIES

The principles of Trust through Transparency and Accountability are the core of HCL's existence. HCL ensures strict compliance with ethical and legal standards across the company and also adheres to the Human Rights principles. These principles extend not only to the employees but also third parties, client's suppliers or parties legally associated with the operations relating to the Company.

Mentioned below are key policies that mark our adherence to an acceptable operating standard in UK:

- 1) **Code of Business Ethics and Conduct:** We have prescribed a Code of Business Ethics and Conduct (COBEC) that provides for transparency, ethical conduct, a gender friendly workplace, legal compliance to all regulatory norms and protection of the Employee rights and integrity. COBEC is a set of guiding principles and covers all directors, employees, third party vendors, consultants, suppliers and customers across the world. As per COBEC, HCL's relationships with suppliers are to be based on lawful, efficient and fair practices. Consequently, we expect our suppliers to obey our policies and the local laws that require them to treat employees fairly, provide a safe and healthy work environment and protect the quality of the environment.
- 2) **Anti-Bribery and Anti-Corruption Policy:** This policy prohibits any practices related to corruption, or any practice that can potentially lead to corruption. HCL has very stringent processes that do not permit such practices in supply chain or the business environment.
- 3) **Procurement Process:** The procurement team has defined elaborate process guidelines which are to be followed by all the companies in the HCL group, including AXON for the purposes of procuring requisite goods and services from vendors across the globe. It is our endeavour to ensure that we meet global standards & follow best practices in business engagements with all our vendors. Agreements on critical expectations from suppliers regarding the management of supply chain and integrity in operation with due compliance to all legal standards is documented in the contracts for reference and records.
- 4) **Human Rights Policy:** HCL also has Human Rights policy that describes how HCL values its workforce and ensures that they are provided with a respectful and secure environment to operate. This policy is closely linked to various other policies like: "*Occupational Health Safety and Environmental Policy*" which further focuses on a conducive environment for our workforce.

REPORTING MECHANISM

In the event of any non-compliance to any of our above stated policies by our employees ,customer or supplier or if they are found to be in violation of the same or found to be involved in unethical practices, they, along with their representatives, may be prohibited from doing any business with HCL.

HCL has a **Whistleblower Policy** that encourages reporting of violation of any of the above stated policies. Such reporting can be done by employees or anyone outside the organization too. Reporting done under this policy are handled by a third party to ensure a non-biased approach. There is a defined process to look into any non-compliance that may arise owing any of the actions that are not compliant as per the Company's norms.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING IN SUPPLY CHAIN

As part of our initiative via various policies as listed above, HCL has a framework to identify and mitigate risk:

- 1) By conducting due diligence on our suppliers and their activities before they are engaged. All such is done via appropriate assurance to adhering all organization policy and laws of the land.

- 2) HCL has signed the UN Global Compact since 2011 confirming its voluntary commitment to abide by the ten UN principles on Human Rights
- 3) HCL does required due diligence prior to engaging with suppliers and ensures long lasting relationships to strengthen the commitments towards such practices.
- 4) All our policies focusing on governance of these aspects are periodically reviewed to ensure that they are at par with the global best practices and laws of the land.

TRAINING

To ensure a high level of understanding of the governance policies as mentioned above, all suppliers are required to make themselves aware of all relevant policies and laws (as applicable). A clause is added to each contract specifying strict compliance of above stated policies and termination rights in case of non-compliance. Our employees are also provided training on COBEC. We intend to implement more robust training programmes in the future for awareness and adherence.

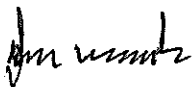
NEXT STEP

AXON.is committed to ensuring that there are no instances of slavery or human trafficking in our supply chain and we intend to take the following steps to combat slavery and human trafficking:

1. Outline management KPI's focusing on strengthening existing checkpoints and improvising on new methods to have a more robust model to cater to omission of such practices
2. More stringent supplier engagement with detailed clauses to comply with the Modern Slavery Act, 2015.
3. Obtaining periodic sign offs on compliance with respect to Modern Slavery Act, 2015.
4. Conducting specifically targeted training programmes for our staff.

This statement is made for the financial year ending 31 March 2019.

Axon Solutions Limited Board of directors approved this statement through written resolution passed on **September 18, 2019**



Shiv Kumar Walia
Director

AXON SOLUTIONS LIMITED
September 18, 2019