

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.

This statement is to meet AXON 's obligation to comply with section 54(1) of the Modern Slavery Act, 2015.

ORGANISATION'S STRUCTURE

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

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 2017-2018, AXON made payment of USD 5,162,633 to entities / organisations, comprising our supply chain.

OUR GOVERNANCE AND POLICIES

The principles of Trust through Transparency and Accountability are at the core of HCL's existence. To ensure strict compliance with ethical and legal standards across the company, the Whistleblower policy has been created.

We have prescribed a Code of Business Ethics and Conduct (COBEC) that provides for transparency, ethical conduct, a gender friendly workplace, legal compliance and protection of the Company's property and information. COBEC is a set of guiding principles and covers all directors, employees, third party vendors, consultants 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.

We also have a Procurement Policy which sets out the guidelines to be followed by 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 our vendors.

In the event of any non-compliance of our COBEC policy and if any supplier is 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 in the future.

We are committed to ensuring that there is no slavery or human trafficking in our supply chain or in any part of our business. Our Procurement Policy strongly discourages forced labour including slave labour or trafficking of humans or the infringement of human rights.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative via COBEC and Procurement policy, HCL is developing a framework to identify and mitigate risk by conducting due diligence on our suppliers and their activities before they are engaged.

SUPPLIER ADHERENCE TO OUR VALUES AND POLICIES

We have clear standards towards slavery and human trafficking. To ensure that all those in our supply chain and contractors comply with our values, we have in place, various governance policies as outlined above, which must be adhered to, by all suppliers who intend to do business with AXON.

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 will be added to each contract specifying strict compliance of HCL COBEC policy and termination rights in case of non-compliance. Our employees are provided training on COBEC. We intend to implement more robust training programmes in the future.

NEXT STEP

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

1. More stringent supplier engagement with detailed clauses to comply with the Modern Slavery Act, 2015.
2. Obtaining periodic sign-offs on compliance with respect to Modern Slavery Act, 2015.
3. Conducting specifically targeted training programmes for our staff.

This statement is made for the financial year ending 31 March 2018.

The AXON Board of directors approved this statement at its Board meeting on 4th December 2018.



Shiv Kumar Walia
Director
Axon Solutions Limited.
4th December 2018