

MODERN SLAVERY ACT STATEMENT (“Statement”)

Financial Year Period: 2017 – 18

Background

ITC Infotech India Limited’s (“**Company**”/“**ITC Infotech**”) and its wholly owned subsidiaries’ (namely ITC Infotech Limited, UK and ITC Infotech (USA) Inc.) commitment to human rights focuses on subjects such as forced labour, slavery, child labour and human trafficking and thereby the Company and its wholly owned subsidiaries are committed to ensure that its personnel and suppliers across the globe take appropriate steps to mitigate the risk of human trafficking and slavery in any part of its business.

About the Company

ITC Infotech is a specialized global full service technology solutions provider, led by Business and Technology Consulting. ITC Infotech’s Digitaligence@work infuses technology with domain, data, design, and differentiated delivery to significantly enhance experience and efficiency, enabling the Company’s clients to differentiate and disrupt their business.

The Company is powered by a growing portfolio of specialized solutions addressing critical business challenges, including: Industry 4.0 solutions (PLM, IoT and Embedded), Customer Value Management, Loyalty, Trade Marketing & Distribution, Supply Chain Optimization, Data Engineering and Analytics, Healthcare Analytics, Digital Banking solutions and Digital Agriculture solutions. The company provides solutions to enterprises in Supply Chain based industries (CPG, Retail, Manufacturing, Hi-Tech) and Services (Banking, Financial Services and Insurance, Healthcare, Airline, Hospitality) through a combination of traditional and newer business models.

Introduction to the Statement

The Company has, and is committed to exhibit, zero tolerance towards all facets of modern slavery, including slavery, servitude and forced or compulsory labour, human trafficking or exploitation in its businesses and supply chains, as elaborated under the Modern Slavery Act, 2015 of the United Kingdom (“**Act**”).

In pursuance of this, this Statement is published pursuant to Section 54(1) of the Act elucidating the initiatives undertaken to eradicate the slavery and/or human trafficking from any part of the Company including its supply chains. This Statement sets out the steps that the Company and its wholly owned subsidiaries have taken to ensure that slavery and human trafficking is not taking place in its businesses or supply chains.

In this Statement, references to “slavery, servitude and forced or compulsory labour”, “human trafficking” and “exploitation” are as per the definitions set out in the Act.

This Statement pertains to the financial year of the Company as stated above. This Statement may be reviewed annually and updated as may be required.

The Company Policy

ITC Infotech strictly adheres to and complies with all employment related laws, including laws related to working hours, wages, welfare and human rights.

The Company operates within an established corporate governance framework that is underpinned by the Company’s vision and values. ITC Infotech is dedicated to creating a fair and transparent work environment with mutual respect for all.

The Company’s Code of Conduct reflects its commitment to act ethically and with integrity in all its business relationships, including dealing with people in the organisation and relationships with suppliers, vendors and customers. The Code of Conduct is available on the Company’s intranet portal.

The Company expects that all those who work with and for it (“Transacting Party”), including without limitation, its personnel, supply chains and contractors, to read and comply with this Statement.

Non-adherence to comply with this Statement may result in disciplinary action, including dismissal, or termination of the contract or any other legal action against the Transacting Party.

The Company requires that non-adherence to this Statement to be immediately brought to the attention of the supervising manager or the relationship manager of the Transacting Party, who shall in turn, report the same to the undersigned.

The Company’s Code of Conduct strictly prohibits any discrimination, harassment or retribution, both personal and professional, towards the person reporting non-adherence.

Preventing Slavery and Human Trafficking in the Company’s Business and Supply Chains

ITC Infotech’s business is primarily information technology services. Any suppliers and partners which ITC Infotech engages with are specific to client requirements. ITC Infotech also obtains IT services and IT skilled resources from certain suppliers, who work with ITC Infotech and its clients’ teams for developing client required software and IT solutions.

ITC Infotech’s supply chains are integrally linked to its successful growth and works end-to-end to bring specific industry experience as well as a cross-industry perspective to help seed innovation. ITC Infotech is committed to ensure that there is no slavery or human trafficking in any part of the Company’s business including its supply chains.

The Company expects its suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare, human rights. The Company’s suppliers are expected to work in accordance with applicable laws and policies and approach with regards to health, safety, environmental and people development objectives.

The Company provides every employee with a written employment contract and ensures that it complies with legal obligations relating to employment, pay, working hours, rest breaks, holidays and all due care is taken towards ensuring health and safety of employees and workers.

The Company conducts appropriate checks on all employees, workers and all those who work with and for it as suppliers or service providers.

The Company does not employ any person below the statutory age nor does it use forced labour in any form.

The Company has a formal grievance framework to address and resolve any issues, concerns, complaints or grievance arising out of employment, called Sahyog.

The Company’s suppliers are required to assess their businesses and supply chains to comply with the Act.

This Statement is made by and on behalf of ITC Infotech India Limited and its wholly owned subsidiaries under section 54(1) of the Modern Slavery Act 2015 for the financial year ended 31 March, 2018.

Anand Talwar

Chief Human Resources Officer

Authorised for and on behalf of ITC Infotech India Limited and its subsidiaries