

HCL Modern Slavery Statement

Introduction

In 2015 new legislation was introduced entitled the Modern Slavery Act 2015. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

HCL is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

This statement represents HCL's slavery and human trafficking statement.

Responsibility

Responsibility and accountability for HCL's compliance with the Modern Slavery Act 2015 ultimately lies with the director(s) of HCL.

HCL works to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

Our Modern Slavery Act Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure our suppliers comply with the requirements of the Modern Slavery Act 2015.

Risk

Overall risk for HCL related to Modern Slavery Act compliance is deemed to be low, for the following reasons:

- HCL operates is almost entirely UK based and operates in the field of management consultancy & training
- Our supply chain is limited to goods and services which are required to support an organisation of this nature (e.g. knowledge, stationary & software)
- Use of non-UK based suppliers is extremely limited
- Expenditure on suppliers is very low.

Supplier Due Diligence

- We have zero tolerance to slavery and human trafficking. We expect all suppliers to comply with our values.
- We endeavour to establish and build long standing relationships with our local suppliers
- It is not practical for us (and every other participant in the chain) to have a direct relationship with all members of the supply chain or have systems in place to encourage the reporting of concerns and the protection of whistle blowers.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the HCL's slavery and human trafficking statement.