

## **TRANSPARENCY STATEMENT ON MODERN SLAVERY FOR 2024**

This is the Modern Slavery Statement for Mastek Systems Co. Ltd. (UK) (“**Mastek**”) for the financial year ending 31<sup>st</sup> March 2024 and is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”).

Modern slavery is a crime in all forms, and we will not tolerate any such activities within our operations or supply chain. We are committed to ensuring that everyone who works for Mastek benefits from a working environment in which their fundamental rights and freedoms are respected and that anyone we do business with also upholds these principles.

The information in this statement identifies policies, processes and actions we have taken and continue to take to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our business.

### **Mastek and our Supply Chain**

Mastek is a wholly-owned subsidiary of Mastek Enterprise Solutions Private Limited, India, which in turn is a subsidiary of Mastek Limited, a publicly listed company registered in India. Mastek’s business provides software implementation services, support services and enterprise software services, and the main business asset is human resources. In order to provide its services, Mastek often calls upon the skilled human resources of its parent company under a service agreement arrangement. These skilled resources may travel to the UK on work permits and provide services from Mastek’s development centers in India. Mastek also recruits staff from the local UK market and other countries.

We seek to partner with suppliers who uphold Mastek’s values and ethics, providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically, and using environmentally responsible practices where practicable. Mastek procures goods and services from the local UK market and assesses the suitability of suppliers by conducting relevant due diligence checks. We also ensure we have suitable terms and conditions of supply with all our preferred and other suppliers.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risks, we have in place a corporate risk assessment and reporting process to:

- Identify and assess potential risk areas in our business and supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle-blowers from any retaliation, which may include dismissal, suspension, demotion, loss of promotion opportunities, punitive transfers and reductions in or deductions of wages, harassment or other punitive or discriminatory treatment.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. Our Code of Business Conduct and Ethics Policy specifying modern day slavery and our Whistleblowing Policy each reflect our commitment to act ethically and with integrity in all our business

relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

These policies apply to both Mastek and Mastek Limited and are available to all employees via our intranet site. Relevant functional heads manage the policies and reporting processes support the escalation of policy issues to senior management.

### **Assessment of Slavery and potential Human Trafficking Risks in the business areas of Mastek**

The majority of Mastek's assets and operations are people-related and fall into two categories:

1. Mastek's employees, and
2. Agency or contract staff, the numbers of which fluctuate depending on demand.

Management and staff can report risks through our corporate risk assessment and reporting process. Our other business activities are minor by comparison and include procuring property leases, third-party software, computer hardware and office equipment and services. It is our view that the risks of slavery and human trafficking in these supply chains are low.

### **Supplier adherence to our values and ethics**

We have zero tolerance for slavery and human trafficking. To ensure all those in Mastek and our supply chain and contractors comply with our values and ethics, we have a compliance team, which works alongside legal, human resources, procurement and other functions to comply with this statement.

### **Our effectiveness in combating slavery and human trafficking**

We are introducing the following key performance indicators (KPIs) to measure our effectiveness in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains:

KPI: Full compliance with Mastek's values related to anti-slavery for all active supply chains - We expect full compliance from all active and immediate supply chain partners.

KPI: All prospective suppliers assessed via Mastek's vendor onboarding process - All prospective suppliers are required to self-assess compliance to the Act as part of standard onboarding processes. Thereafter, Mastek shall annually review the suppliers for this purpose.

KPI: Transparency Statement on Modern Slavery for 2024 published on Mastek's external website within six months of Mastek's financial year-end.

KPI: Conduct annual due diligence on procurement policies, processes and practices – a review of all procurement policies, processes, and practices shall be conducted at least once every year.

KPI: Training - To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, we provide training to our staff and ensure that supply chain and contractors provide training to their staff and providers.

KPI: Where appropriate, provide workshops for the supply chain to identify and eradicate modern slavery.

**Board approval**

This statement has been approved by the Board of Directors of Mastek Systems Co. Ltd., UK on 11<sup>th</sup> July 2024 and will be updated annually in line with the Act's reporting requirements.



Abhishek Singh  
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**Director**  
**Mastek Systems Company Limited**