



# Cognizant Technology Solutions Australia Group - Modern Slavery Statement FY 2024

## Background

This statement is provided pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**) by Cognizant Technology Solutions Australia Pty Ltd (ACN 100 749 997) (**CTS Australia, we, or our**).

This statement outlines the actions which CTS Australia took to address modern slavery risks in our business and supply chain for the US financial year ending **31 December 2024**.

This is the fifth statement provided by CTS Australia under the Australian modern slavery reporting regime. Cognizant Worldwide Limited (**CWW**), a company registered in the United Kingdom, has provided six statements to date under the *Modern Slavery Act 2015* (UK).

## Introduction

CTS Australia is part of Cognizant, one of the world's leading digital technology and professional services businesses.

Cognizant is headquartered in New Jersey (USA) and has approximately 336,800 employees worldwide (as of 31 December 2024).

The Cognizant Sustainability and Corporate Citizenship Report ("**Sustainability Report**") is published annually and includes information about Sustainability commitments, policies, and processes. As part of our ongoing Sustainability development efforts, we also consider Sustainability in our supply chain in new ways. More information is available in our Sustainability Report.

## Modern Slavery, Human Trafficking and Forced Labour

Cognizant opposes all forms of slavery, human trafficking and forced labour in its operations and the operations of its suppliers. Cognizant's management of modern slavery risks falls within its overall approach to protecting human rights and equal opportunity and upholding business ethics.

## Alignment with External Initiatives - United Nations Global Compact

In February 2021, Cognizant joined the United Nations Global Compact (UNCG), a worldwide network of companies and non-business participants that are committed to building a sustainable future. In October 2021, we deepened our commitment by joining the United Nations Global Compact India (UNGCI), a country-level leadership platform for strengthening sustainable business practices.

These principles focus on supporting the protection of human rights, promoting greater environmental responsibility, and working against corruption in all forms. In keeping with these principles, we adopted goals for our company and report regularly on our progress toward their achievement.

## Policies and Practices

Cognizant extends its commitment to address modern slavery to the management of its supply chain. Our supply chain management policies include:

- Cognizant's 'Supplier Standards of Conduct' which apply to all our third-party representatives, suppliers, vendors, subcontractors and business development agents and their parent, subsidiary and affiliated entities, or collectively, suppliers, including suppliers engaged by Cognizant's subsidiaries and affiliates. (see *Supplier Standards of Conduct* section below for further details).
- Cognizant's Global '[Human Rights Policy](#)' which outlines our commitment to respect the basic principles of human rights and sets the expectation that our suppliers, business partners and clients adopt similar policies within their own businesses. The principles for addressing child labour and forced labour are:
  - End human trafficking. Never engage in trafficking in persons, which includes but is not limited

to the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labour of any form. All Cognizant employees are responsible for proactively reporting human trafficking to the appropriate authorities. Under Cognizant's Human Rights Policy, we encourage our employees to report any known or suspected human trafficking through various channels available to them.

- Cognizant adopts a zero-tolerance approach to human rights abuses in the supply chain. Our Supplier Standards of Conduct prohibit and address human rights abuse and are embedded into vendor contracts throughout our supply chain.

Our [Supplier Diversity Policy](#) sets out Cognizant's commitment to providing opportunities for all qualified businesses to participate as suppliers of products and services to our company. Our commitment to supplier diversification is not philanthropic, nor does it contradict the application of existing purchasing goals, policies and procedures. The award of opportunities to all suppliers will be based on criteria established as part of the sourcing request or other criteria that may arise from time to time, including, but not limited to, their relative competitiveness, the value of their offerings, and their demonstrated performance.

### Global Human Rights Policy

In December 2020, Cognizant adopted a global [Human Rights Policy](#). The Human Rights Policy affirms Cognizant's commitment to respecting human rights globally, and seeks to ensure that we are not directly or indirectly complicit in human rights abuses by focusing on:

- ending human trafficking
- maintaining a safe and healthy workplace
- considering our supply chain
- maintaining respect for freedom of association
- ensuring fair and merit-based employment decisions
- treating others with dignity and respect
- competing ethically

The Human Rights Policy reflects a zero-tolerance approach to human rights violations (including modern slavery) and reinforces Cognizant's commitment to following ethical practices in its business dealings and relationships.

The Board of Directors of CTS Corporation, through its Governance and Sustainability Committee, has overall responsibility for overseeing the Company's human rights program. Responsibility for managing day-to-day compliance with the Human Rights Policy rests with the Chief People Officer in conjunction with the Chief Ethics and Compliance Officer.

Amongst other things, the Human Rights Policy stipulates that: *"If you are aware of a violation of this policy, you have an obligation to report it to the Company. As stated in Cognizant's Whistleblower and Non-Retaliation Policy, Cognizant does not tolerate retaliation against any individual who submits a good faith report of a violation or possible violation of law, the Code of Ethics, or other Cognizant policies."*

The launch of the Human Rights Policy was accompanied by a training and awareness campaign for Cognizant associates around the globe, that we continue to offer when we are onboarding new employees.

### Key Principles and Code of Ethics

Cognizant's goal is to engineer modern businesses to improve everyday life. We do this based on four (4) key ethical principles:

1. We earn trust by continually striving to be a trusted business partner and corporate citizen. In pursuing this goal, we must consistently incorporate ethical standards into our day-to-day business activities.
2. We do the right thing, the right way. Our clients, shareholders and communities depend on our commitment to perform with the highest level of integrity.



3. We respect people and the environment. Cognizant is committed to a safe and healthy work environment.
4. We live up to our responsibilities. Our commitment to doing business ethically includes respecting privacy, protecting information and safeguarding assets.

Our [Code of Ethics \(Code\)](#) builds on the key principles and articulates the standards of conduct that we expect from managers and associates to ensure that they cultivate our culture of integrity.

The Code is important because it instills trust and confidence in the minds of our clients, shareholders, partners and associates. Our employees (known within Cognizant as “Associates”) and other stakeholders are encouraged to report concerns proactively.

#### Australia Whistleblower Policy

In April of 2020, CTS Australia implemented an Australia specific ‘Whistleblower & Non-Retaliation Policy’ (**WB Policy**) in response to amendments to the *Corporations Act 2001* (Cth) (**Corporations Act**).

The WB Policy is based on Cognizant’s global Whistleblower & Non-Retaliation Policy which applies to Cognizant’s worldwide operations (**Global WB Policy**). Reports and disclosures which (a) do not qualify for protection under this WB Policy or (b) are about legal and ethical issues relating to Cognizant business operations not involving CTS Australia, are handled in accordance with the Global WB Policy.

At Cognizant, we promote a ‘speak-up’ culture that relies on our associates raising questions or concerns so that appropriate action can be taken. Reports of suspected improper or unethical activity are investigated and treated confidentially to the maximum extent possible and in accordance with the Corporations Act. Reports and disclosures can be made anonymously.

The WB Policy outlines extensively the reporting avenues available to disclosers as well as the associated protections for disclosers and seeks to ensure fair treatment for individuals.

#### Compliance Helpline

Cognizant maintains an [Ethics and Compliance Helpline](#) through which associates, customers, vendors and others can anonymously communicate concerns about potentially unethical behaviour. The Helpline is resourced by a third-party provider and can be accessed online or by telephone. Investigations are handled by an experienced company investigator.

#### Supplier Standards of Conduct

In 2024, Cognizant conducted its annual update to its [Supplier Standards of Conduct \(Supplier Standards\)](#) to formalize the expectations and requirements in terms of ethical business conduct.

The Supplier Standards apply to all our third-party representatives, suppliers, vendors, subcontractors and business development agents and their parent, subsidiary and affiliated entities, or collectively, suppliers, including suppliers engaged by Cognizant’s subsidiaries and affiliates.

All suppliers are required to review and confirm their understanding of our Code, our Anti-Corruption Statement and our Human Rights Policy.

The Supplier Standards list several specific requirements. Those related to addressing modern slavery, child labour and forced labour include:

- **Prohibition on Child Labor.** Cognizant strictly prohibits the use of child labor in any of the supplier’s operations. Suppliers must not employ workers younger than the greater of (a) 15 years of age, or 14 where the local law allows such exception consistent with International Labor Organization guidelines, or (b) the age for completing compulsory education, or (c) the minimum age established by law in the country of operations. In addition, suppliers must comply with all legal requirements for authorized young workers (including students and interns), particularly those pertaining to hours of work, wages and working conditions.
- **Prohibition on Forced Labor.** All forms of forced or compulsory labor, such as prison labor,

bonded labor or indentured labor, are forbidden in any operations. Forced overtime and human trafficking are also strictly prohibited. Additionally, Cognizant expects suppliers to follow responsible recruitment practices to prevent forced labor and other forms of modern slavery. Suppliers and their agents and subagents are prohibited from holding, destroying, concealing, confiscating or denying workers access to their identity or immigration documents.

Cognizant leverages publicly available globally recognized slavery risk indices to assign country and purchase commodity-level risk to suppliers, which determine appropriate due diligence to perform on our supply chain.

- **Prohibition on Charging Workers for Employment.** Suppliers are prohibited from charging any recruitment or other related fees to workers for employment. If any such fees are found to have been charged by the suppliers to workers, such fees shall be repaid to the workers immediately .
- **Commitment to Health and Safety.** Suppliers must provide clean, safe and healthy working conditions for all employees. Suppliers must comply with all applicable, legally mandated standards for workplace health and safety in the countries in which they operate, and Cognizant encourages suppliers to implement industry best practices.
- **Fair Wages and Benefits.** Suppliers must pay workers according to any applicable minimum wage, as well as any legally mandated overtime premium for all hours worked. Suppliers also must ensure that any legally mandated benefits are being provided to their employees and that there are no illegal deductions for employee benefits. Workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Suppliers are also required to take steps to ensure equal pay for equal work and that remuneration for work of equal value is established without discrimination.
- **Working Hours.** Working hours are not to exceed the maximum set by local law. Furthermore, a standard workweek should not exceed 48 hours or 60 hours, including overtime, except in emergency or unusual situations. All overtime must be voluntary and workers must be allowed at least one day off every seven days.
- **Freedom of Association and Collective Bargaining.** Suppliers must respect the right of all workers to form and join, or not join, a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) and to bargain collectively. Suppliers will prohibit any form of intimidation, harassment, retaliation and violence against workers exercising these rights.
- **Private and Public Security Forces.** Where our suppliers employ security personnel, we expect them to respect all internationally recognized human rights and to ensure that personnel receive appropriate guidance and training. We will not tolerate unlawful behavior towards employees or third parties.
- **Commitment to Responsible Sourcing.** Suppliers commit to sourcing goods and services for Cognizant in alignment with all the principles and standards laid out in Cognizant's Supplier Standards of Conduct. Suppliers should give exceptional emphasis to sourcing with the same fundamental support of human rights, labor, health and safety, environment and ethics as set forth in these Supplier Standards. This commitment also applies to the responsible sourcing of minerals, including conflict minerals. Suppliers must take steps to determine if their products contain conflict minerals (including tin, tantalum, gold and tungsten) and, if so, implement supply chain processes to identify the sources of these minerals and support efforts to eradicate the use of conflict minerals, which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

## Risk Analysis

Cognizant's focus for risk assessment of modern slavery practices emerging in our operations and supply chain has been on ensuring that its standards and expectations are clearly communicated to existing and prospective suppliers.

### Structure, operations and supply chain

Cognizant Technology Solutions Australia Pty Ltd was registered in May 2002 and commenced active operations in 2006 as part of Cognizant's broader expansion into the Asia-Pacific region.

CTS Australia has offices in Melbourne, Sydney, Brisbane, Perth and other locations throughout Australia and New Zealand. These office locations form part of a much larger regional footprint which



includes numerous regional offices and delivery centers. In addition, many of our employees are client-based.

As of 31 December 2024, CTS Australia has approximately 2,050 employees based on operations across Australia and New Zealand. Most of the workforce consists of highly trained associates with software engineering, consulting, programming and other IT skills.

Cognizant Technology Solutions Australia Pty Ltd is a wholly owned subsidiary of Cognizant Technology Solutions AG, a company registered in Switzerland.

The ultimate parent entity of all Cognizant entities globally is Cognizant Technology Solutions Corporation (**CTS Corp**), a company incorporated in the State of Delaware (USA) and publicly listed in the USA on the Nasdaq Stock Market.

As of 31 December 2024, Cognizant Technology Solutions Australia Pty Ltd owns and/or controls several entities which it has established or acquired over recent years.

Further, as CTS Australia owns and/or controls various other subsidiary entities, whilst those other entities may not be reporting entities for the purpose of the Act, this statement is provided on a consolidated basis for the CTS Australia group of companies.

CWW is the primary contracting entity for Cognizant's global business, however, CTS Australia, and its respective subsidiaries, at times enter into contractual arrangements with local clients and suppliers.

Although CTS Australia has a large workforce of its own, it often utilizes the services of other Related Body Corporates and/or affiliates forming part of its corporate group from around the globe, in particular the Offshore Delivery Centres (**ODCs**) in India, Malaysia, Singapore and the Philippines.

ODCs are an essential part of CTS Australia's supply chain. They allow us to provide cost effective services, access to global talent and capability, as well as 24/7 worldwide support to clients regardless of geographic location.

### Supply Chain Due Diligence

Cognizant is fundamentally a "people business". We do not manufacture any products, nor do we usually directly procure products for clients. As an exception to this, from time to time, CTS Australia may enter into software resale or licence agreements for clients. In our view, such arrangements do not have a material effect on the level of our exposure to the risk of modern slavery.

CTS Australia's operations are largely confined to Australia. Where a client requires services to be provided offshore, these activities are generally carried out by other entities in the Cognizant corporate group rather than being performed directly or contracted out. Cognizant's global network of offices and ODCs are a key point of difference in the market.

CTS Australia's supply chain is made up of approximately 420 active suppliers across 13 countries as of 2024-year end. Our supply chain relationships include, but are not limited to, suppliers of the following goods and services: Admin and Infrastructure, Corporate Security, Financial Services, Human Resources, Information Technology, Learning and Development, Meetings and Events, Other / Non-Sourceable, Professional Services, Sales and Marketing, and Travel and Global Mobility.

Since IT consulting and professional services is a highly competitive industry, we need to attract and retain talent while building a diverse, inclusive workforce that delivers exceptional client service. There is therefore a strong, ongoing commercial imperative and operational requirement to provide market leading terms and conditions of employment.

We consider that the nature of the industry in which we operate means the risk of modern slavery being used within our service delivery and supply chain is lower than in some other industries. Nonetheless, procedures to avoid engaging or condoning suppliers who engage in modern slavery are in place and continue to be developed.

The risk of exposure to modern slavery practices is higher in relation to ODCs compared to CTS Australia's direct operations and onshore supply chain. This is a product of Australia's high level of legal protections and regulatory enforcement mechanisms relative to other countries in the Asia-Pacific region. India and the Philippines are identified as higher-risk countries under the OECD Guidelines for Multinational Enterprises and the Modern Slavery Index published by the Walk Free Foundation.

Baseline reviews have been conducted with regard to Cognizant's higher-risk activities such as the purchase of office consumables, cleaning and security services and labour hire. Generally, the greatest risk of potential exposure to modern slavery practices arises through the purchase of office consumables (e.g., food and stationery), cleaning and security services arranged by building owners or facility managers of premises occupied by CTS Australia and outsourced printing.

### **Actions taken to address modern slavery risks**

Cognizant has taken several steps to mitigate the risk of modern slavery practices and to continue a culture of continuous improvement within CTS Australia and other companies forming part of its corporate group.

#### **Supplier set-up form**

We continue to include risk-based modern slavery due diligence as a part of our supplier onboarding process, and, in 2022, Cognizant began to reassess suppliers deemed to have a high risk of modern slavery. That process is now repeated annually.

All new suppliers are reviewed based on their risk profile. Cognizant performs a more detailed questionnaire-based review on those suppliers deemed to have higher risk. The questionnaire requires suppliers to respond to a set of questions about their practices and their supply chains in relation to modern slavery, and to upload their policy and process to comply with modern slavery legislative requirements. The questionnaire includes questions such as whether the suppliers have taken any steps to eliminate acts of modern slavery from their own organizations and supply chains.

Suppliers are required to provide evidence that they have implemented modern slavery prevention mechanisms. Those suppliers that do not submit sufficient documentation of their policies and procedures to address modern slavery may be prevented from doing business with Cognizant. Information gathered via the supplier set-up form and the reassessment form is entered into a central database for visibility.

In addition to the questionnaire and desk assessment described above, CTS Australia also incorporate our Supplier Standards of Conduct, which discusses our expectations of our suppliers relating to Labour and Human Rights, into our contracts by reference. CTS Australia plans to include modern slavery-related obligations in our standard contract templates, which require specific warranties and compliance commitments from our suppliers pertaining to modern slavery compliance and controls.

We continue to reassess the questionnaire and diligence process. For example, in 2021, Cognizant conducted a Sustainability supply chain assessment which consisted of internal interviews and external benchmarking. We continue to work towards implementing feasible improvements based on our assessments of the process.

Cognizant reserves the right to monitor and audit each supplier's compliance with the Supplier Standards including, but not limited to, conducting on-site audits of our suppliers' premises, IT systems and infrastructure. Suppliers are expected to maintain all documentation necessary to demonstrate compliance with the Supplier Standards and cooperate with Cognizant associates or third-party monitoring firms in connection with such inspections, or other Cognizant-initiated fact-finding inquiries related to supplier's work for Cognizant.

Suppliers, and their employees and supply chains, are obliged to inform Cognizant immediately if they suspect or become aware of any unethical conduct, actual or potential violation of the Supplier Standards or of any applicable law, regulation or rule.

### Training and communication

As part of our hiring processes, all new employees hired by Cognizant are required to undergo mandatory training covering Cognizant's Code of Ethics. A mandatory refresher is undertaken annually by all employees. See our Sustainability Report for details.

In addition to this, we have built a specific reference to this subject into our corporate induction program and included a module on modern slavery in our in-house people manager training courses. We continue to make modern slavery training available to all global procurement associates who interact with our suppliers.

Additionally, we provide training materials for all of CTS Australia's business, with a focus on local law requirements. This included the distribution of specific communication and training to senior leadership, human resources teams and procurement teams.

### Assessment and monitoring

The risk of modern slavery occurring in CTS Australia's organisation and supply chain is managed in accordance with Cognizant's global compliance framework. The Global Compliance team (based in the United States) is responsible for monitoring and investigating any suspected unethical behaviour including modern slavery.

The Global Compliance team reports directly to the Board of Directors of CTS Corporation and provides regular updates on the outcome of investigations and inquiries relating to a range of ethics and compliance issues. CTS Australia has access to Cognizant's significant dedicated internal compliance capabilities and resources. Specifically, Cognizant employs a Chief Legal Officer, Chief Ethics and Compliance Officer and Chief Security Officer. These individuals and their staff strive to ensure that our operations follow all internal policies and applicable external laws and regulations.

The Global Compliance team is responsible for providing oversight with respect to modern slavery risks on behalf of the Board of Directors of CTS Australia and Cognizant generally. Several committees support the Board of Directors of CTS Corporation, including the Audit Committee, which is responsible for review and evaluation of the company's enterprise risk management and management of third parties and contractual risks.

Cognizant measures its performance and assesses the effectiveness of the control measures outlined above via regular meetings of the senior leadership team and staff pulse surveys. On an annual basis, after each engagement survey, we develop action plans designed to continue to build on our strengths and address improvement areas.

At the time of preparing this statement, CTS Australia has not been charged or convicted of any criminal offences relating to modern slavery or slavery-like practices. We are not aware of any current or previous issues relating to slavery or human trafficking within CTS Australia's operations and supply chain. As such, we have not had to initiate any remediation action to rectify the effects of any modern slavery practices in our operations or supply chains.

### **Consultation and Previous Joint Statements**

In previous reporting periods, CTS Australia has provided a modern slavery statement covering itself and multiple reporting entities within its group, pursuant to section 14 of the Act. This FY24 statement is provided for a single reporting entity, under section 13 of the Act, as only CTS Australia qualified as a reporting entity during the relevant reporting period. All previous modern slavery statements are located on this webpage: [Sustainability and Corporate Citizenship | Cognizant](#).

CTS Australia owns or controls several entities. We confirm that subsidiary entities were consulted while preparing CTS Australia's original modern slavery statement (for entities present at such time), and this statement. The consultation process has included the following specific steps.

In preparing our initial statement (which was published in 2021):

- CTS Australia's Chief Executive Officer sent an email to contact persons at our subsidiaries advising

that we were in the process of preparing the statement and foreshadowing a meeting to gather relevant information.

- Members of CTS Australia's Legal, People & Culture and Compliance teams with representatives from each entity were consulted.
- CTS Australia personnel liaised with subsidiary entities via phone and emails to prepare and finalise the statements.

In preparing this fifth statement:

- The leadership of CTS Australia, including its relevant subsidiaries, were consulted on the status of modern slavery compliance and the program's progress across 2024. This included consultation on the actions taken in 2024, updates since 2023 and the progress on the 2024 statement. This group included CTS Australia's Country Manager and Director, Chief Operations Officer, Head of People and legal leadership.
- Personnel supporting CTS Australia and its subsidiaries core functions and activities related to modern slavery compliance were involved in preparing this statement: including Procurement, Human Resources, Legal, and Sustainability teams. The support of such functions and personnel is largely centralised (or has centralised management) across our Australia operations. This enables the views contained in this statement to reflect the operations, actions and data related to CTS Australia and each of its relevant subsidiaries.
- Further to previous years trainings, in 2024, a communication by CTS Australia's Country Manager was distributed to all CTS Australia personnel on modern slavery, as a reminder of the relevant ethical and legal frameworks, training materials, and the policies and procedures underlying CTS Australia's compliance.
- Based on the consultations outlined above, CTS Australia believes that the risk of exposure to modern slavery practices occurring in the operations or supply chain of its 'owned or controlled entities', including the reporting entities, is not materially different to Cognizant Technology Solutions Australia Pty Ltd's own risk profile.

## Reporting

Cognizant is dedicated to improving everyday life and believes in acting ethically throughout our business. This is why we have built a strong sustainability program. Cognizant has proudly invested in diverse and dedicated leaders to drive our integrated sustainability management approach and deliver tangible results. The Cognizant Sustainability and Corporate Citizenship Report is published annually and includes information about new commitments, policies, and processes.

## Approved by principal governing body and responsible persons



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