



DXC MODERN SLAVERY STATEMENT

FY 2021

OUR COMMITMENT

DXC Technology is committed to minimizing the risk of all forms of forced labor and human trafficking within our global business and supply chain. DXC forbids any form of slavery, human trafficking, forced labor and child labor, and we are committed to complying with applicable laws prohibiting such exploitation. DXC Technology is a member of the UN Global Compact.

DXC Technology is making this statement — as required by section 54 of the UK Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018 — of the actions that DXC Technology Company and DXC Technology Australia Holdings Pty Ltd (ACN 120 570 390) and our subsidiaries and affiliated companies (“DXC”) have taken during our fiscal year ended March 31, 2021, to ensure that modern slavery and human trafficking are not taking place in our supply chain or in any part of our business. DXC policies regarding code of conduct and compliance apply to all employees and entities of DXC.

ABOUT DXC

DXC Technology helps global companies run their mission critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private and hybrid clouds. The world's largest companies and public sector organizations trust DXC to deploy services across the Enterprise Technology Stack to drive new levels of performance, competitiveness and customer experiences. We deliver excellence for our customers and colleagues.

We provide world-class IT services at scale from our Global Innovation and Delivery Centers in North America, South America, Europe, Asia and Australia with globally distributed teams. DXC operates in more than 70 countries.

As a technology company, we purchase software, hardware, services and labor from suppliers worldwide in order to secure the sustainable success of our customers by providing innovative solutions for products and services.

We are committed to living our values: Deliver, Collaborate, Community, Care, and Do the right thing. We believe in stewardship and supporting our communities, and we take care of each other and act with integrity.

POLICIES AND PROCEDURES

DXC has global policies and procedures in place to combat human rights violations, such as child labor or forced labor, and to explicitly target modern slavery and human trafficking. These policies apply to all geographies in which DXC operates. Our local DXC entities are empowered to respond to local risks and issues to further mitigate concerns or risks.

DXC policies related to preventing modern slavery include the DXC Code of Conduct and accompanying employee training material, the DXC Human Rights Statement, and the DXC Responsible Supply Chain Principles (with accompanying guidance and employee training material).

The Code of Conduct, Human Rights Statement and Responsible Supply Chain Principles are published on dxc.com. These policies are also made available to our directors, officers, managers, employees and representatives through awareness and training programs.

Code of Conduct

DXC employees are required to follow the DXC Code of Conduct and report any modern slavery concerns to management, to the DXC Ethics and Compliance Office or to DXC's confidential reporting channel, OpenLine. All employees are required to complete Code of Conduct training annually. The Ethics and Compliance Office is responsible for implementing the Code of Conduct.

DXC intends for the Code of Conduct to apply equally to everyone working at, with or on behalf of DXC. This includes DXC directors, officers, executives, employees, business partners and suppliers, agents and other company representatives. Anyone who violates the Code of Conduct, the law or our policies may be subject to disciplinary action, up to and including termination, in accordance with applicable laws.

View the [DXC Code of Conduct](#).

Human Rights Statement

The DXC Human Rights Statement was developed in accordance with the tenets of the United Nations (UN) Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights.

As a leading global IT services company, DXC attracts highly skilled and educated employees. Our main human rights-related focus areas include promoting good practice through our large and diverse global supply chain and supporting a diverse and inclusive corporate culture.

DXC's approach to human rights encourages employees and suppliers to go beyond legal compliance, drawing on internationally recognized standards to advance social and environmental responsibility and business ethics.

View the [DXC Human Rights Statement](#).

Responsible Supply Chain Principles

The DXC Responsible Supply Chain Principles drive our commitment to fostering sustainable business practices across our global network. We are serious about our environmental, social and financial responsibilities, and we strive to develop good relationships with suppliers who take them seriously, too. The DXC Responsible Supply Chain Principles cover five main categories:

- Respecting the basic human rights of our people
- Enforcing labor standards and prohibiting child labor
- Prohibiting corruption and bribery
- Protecting the environment
- Fostering equality, diversity and inclusion

Our suppliers are required to adhere to the DXC Responsible Supply Chain Principles. These principles speak to our customer commitments and

relationships, which are built on trust and personal responsibility. They establish the standards required for conducting business with DXC.

View the [DXC Responsible Supply Chain Principles](#).

SpeakUp! reporting with mailbox and OpenLine reporting channel

DXC provides several reporting channels for anyone to raise concerns about responsible business practices, including modern slavery issues. These reporting channels include:

- DXC Ethics and Compliance (ethics@dxc.com)
- SpeakUp! (speakup@dxc.com)
- OpenLine (<https://secure.ethicspoint.com/domain/media/en/gui/32161/index.html>), which allows anonymous reporting

DXC's management periodically convenes an Ethics Committee to review current initiatives and monitor the operation and activity of DXC's OpenLine. Any emerging trends or issues on human rights are reviewed by the ESG Executive Steering Committee, which comprises executive management.

DXC STRUCTURE, OPERATIONS AND SUPPLY CHAINS

DXC Technology and our subsidiary companies provide world-class IT services at scale from our Global Innovation and Delivery Centers in North America, South America, Europe, Asia and Australia with globally distributed teams. DXC operates in more than 70 countries and has more than 130,000 employees, approximately 97% of whom are on regular or permanent contracts. A significant percentage of our colleagues are in Asia (approximately 40%) and the Americas (approximately 25%).

As a technology group, we purchase software, hardware, services and labor, working collaboratively with our ecosystem partners and wider supply chain to secure the sustainable success of our customers by providing innovative solutions. We provide services in the areas of modern workplace, IT outsourcing, cloud, security, applications, analytics and engineering, and insurance business process as a service (BPaaS) and business process outsourcing (BPO).

DXC activities and industries are largely considered low risk for modern slavery. DXC does not manufacture any hardware, and our core activities often require specialist skills. Our workforce is highly skilled, and English is the common language across the business. Our core activities and the industries in which DXC operates keep our risk profile low for modern slavery and labor violations.

INTERNAL MANAGEMENT OF MODERN SLAVERY CONCERNS

DXC employees are required to follow the DXC Code of Conduct and report any concerns on modern slavery to management, the DXC Ethics and Compliance

Office, Human Resources, Legal, Internal Audit or via the DXC OpenLine channel. Such reports may be made openly, confidentially and/or anonymously, as allowable by law, through any of these reporting channels.

SUPPLY CHAIN MANAGEMENT OF MODERN SLAVERY CONCERNS

In all our procurement activities, DXC takes into careful consideration a set of economic, process-driven and technical criteria as well as essential social, environmental and ethical responsibilities such as human rights, labor conditions, anticorruption concerns and environmental protection. We have supplier screening questions that we require all prospective suppliers to answer, and we conduct corporate responsibility screening of our largest direct spend suppliers.

Our efforts cover all levels of our engagement with suppliers. We have incorporated specific questions on modern slavery and human trafficking into our initial screening survey for suppliers, so our policies are at the foundation of every interaction thereafter. We also have incorporated specific questions on modern slavery and human trafficking into our corporate responsibility screening survey for our largest direct suppliers by spend.

We are incorporating our modern slavery prevention efforts in our contracts with suppliers. Modern slavery is addressed in our purchase order terms and conditions, which are listed on every purchase order. Specific text on modern slavery and human trafficking has been included in the Responsible Supply Chain Principles schedule since 2018. These commitments will be more deeply embedded throughout our supply chain as we renew contracts.

Our suppliers are required to adhere to the DXC Responsible Supply Chain Principles. These principles speak to our customer commitments and relationships, which are built on trust and personal responsibility. They establish the standards for conducting business with DXC. We routinely assess performance of our key suppliers and evaluate compliance with our principles.

In addition to being emphasized by DXC for specific engagements with key suppliers, the principles are available on DXC's website for all our contractors and their employees to view. We hope that this will increase awareness of modern slavery and encourage more reporting and cooperation against it.

DXC periodically conducts a Responsible Supply Chain survey that includes environmental and social criteria. This was last conducted in FY 2021, and we are planning to conduct another in FY 2022.

Responsible Supply Chain survey FY 2021

As part of our due diligence, DXC conducts a Responsible Supply Chain survey. In FY 2021 DXC undertook a review of our supply chain, including questions to suppliers regarding environmental and social topics. We surveyed a selection of our suppliers, including Tier 1 suppliers, some of whom may have high potential for risk elements of modern slavery.

Of the 107 suppliers chosen for the survey, a minority of current suppliers in scope did not have modern slavery statements. Through additional contact and research, we discovered that many had policies and programs similar to the modern slavery requirements of this report. Other suppliers were deemed low risk due to core

activity or low spend. Results following responses to the survey were that approximately 94.4% of the spend in scope was deemed low risk for modern slavery. The remaining 5.6% will be considered for further inquiry. As our processes and policies include more stringent requirements for new and renewing contracts, we feel assured that the risk of modern slavery in the DXC supply chain is low and likely to diminish.

In awareness that there are risk elements in certain types of activities, we inquired more deeply through interviews of some suppliers, covering approximately 8.7% of the spend in scope.

During this deeper inquiry, we found several policies and frameworks with a special focus on modern slavery as well as deeper engagement with the supplier's own supply chain. There was also evidence of third-party assessments deep into the supply chain. We were reassured further of the due diligence of some of our suppliers.

We have no key suppliers under a necessary action plan. We will continue to monitor and remain alert to any new risks that may emerge. There were no material breaches reported during FY 2021 this time.

Due diligence

DXC takes a risk-based approach to managing modern slavery and human trafficking in our supply chain. We make our commitments public via our websites, we require employees to abide by several policies, and we are in the process of requiring all suppliers to have these commitments explicitly stated in contracts with DXC.

DXC addresses modern slavery in initial screenings with suppliers as well as in corporate responsibility screening for our largest suppliers by spend. All suppliers have agreed, by being a supplier to DXC, to abide by the DXC Responsible Supply Chain Principles and all applicable laws. This gives some assurance of intention and level of compliance. In addition, we conduct a supplier survey on a regular basis.

The types of activities that DXC procures — for example, software activities — are largely skilled, requiring high levels of education and specialist knowledge as well as English language skills. These are considered low risk for modern slavery. We have a high level of assurance that there is little risk of modern slavery among DXC's suppliers.

Remediation

DXC offers several methods for reporting concerns about modern slavery. These include reporting via management, the SpeakUp! hotline, and OpenLine online reporting, which offers confidential reporting. These are reviewed regularly by the Ethics Committee.

DXC works with any suppliers found to have breaches or incidents to fill gaps in compliance. During FY 2021, there were no suppliers in remediation activities concerning modern slavery issues.

EFFECTIVENESS AND PERFORMANCE INDICATORS

Our business operations and activities are considered low risk for modern slavery, and we are committed to minimizing the risk of all forms of forced labor and human trafficking within our global business and supply chain. We will increase our monitoring of our effectiveness to include the following key performance indicators concerning modern slavery issues:

- Percentage of staff completing Code of Conduct training
- Number of reports across all channels concerning modern slavery
- Percentage of high-risk suppliers
- Number of suppliers terminated for modern slavery infractions

Internal Code of Conduct training was completed by 99% of our staff in FY 2021. With our requirement to report labor issues applicable to all employees, we are confident that our people are aware of and would report any possible incidents.

DXC received 21 complaints about vendors and suppliers through our various reporting channels in FY 2021. For each complaint, DXC's Ethics and Compliance investigations group followed our prescribed investigations process, which ensured all complainants received a measure of due process. In the limited number of investigations that resulted in a finding of vendor/supplier misconduct, DXC was the victim in almost all cases. For example, DXC was variously the victim of theft, misuse of DXC proprietary information, and vendor/supplier hiring decisions motivated by nepotism. In the rare event that resulted in a finding of vendor/supplier misconduct where DXC was not the victim, the misconduct was not related to the severe exploitation of others for personal gain. DXC addressed vendor/supplier misconduct in a variety of ways, including by severing the relationship with the vendor/supplier and by prompting the vendor/supplier to discipline their employees. We are glad to know that our people are participating in the reporting process and that our efforts appear to be having a positive impact.

With our Responsible Supply Chain Principles and increasing inclusion of modern slavery concerns in our purchase contracts and communications, the growing reach of our policies gives some assurance that our external stakeholders are also working with us to prevent modern slavery in our business.

Our Responsible Supply Chain survey, conducted regularly, helps us measure the percentage of our supplier base that is high risk. By tracking action plans associated with suppliers of concern, we are able to address any gaps in compliance.

A measure of the effectiveness of our program is the number of suppliers terminated for modern slavery infractions. In FY 2021, we did not find any modern slavery incidents within our supply chain.

TRAINING

DXC requires all employees to complete Code of Conduct training annually. During FY 2021 this was conducted in November 2020, and 99% of DXC colleagues completed the training. DXC also offers further training regarding

supply chain transparency. This is offered online in DXC University to all employees. Other topics are also included in DXC University, and more than 117,000 DXC colleagues have completed training programs through DXC University.

OTHER DXC EFFORTS: DXC AS A GOOD CITIZEN

DXC is committed to living our values: Deliver, Collaborate, Community, Care, and Doing the right thing. DXC contributes to charities, nonprofits and social enterprises and is committed to fostering a diverse and inclusive culture.

For example, the DXC India Foundation helps improve the social mobility of underrepresented/underprivileged groups by collaborating with nonprofit partners to foster digital literacy and skill development, particularly in science, technology, engineering and mathematics. These activities support efforts to eradicate the conditions that allow modern slavery to continue.

DXC is proud to be a leading company for corporate citizenship. In addition to receiving a Gold medal from EcoVadis in 2021 for our sustainability actions, we have been named one of the 100 Best Corporate Citizens of 2021 (3BL Media) and named by Newsweek to its list of America's Most Responsible Companies 2021.

We cultivate a culture that supports inclusion, diversity and progress. We were awarded Best Global Culture and Best CEOs for Diversity by Comparably and were also given a top score of 100 on the 2021 Disability Equality Index.

DXC FUTURE ACTIONS

While we have many proactive programs to identify and reduce the risks of modern slavery and human trafficking, as a responsible business we are motivated to do more. Several possible actions have been identified for consideration to enhance our efforts concerning modern slavery. These actions include the following:

- Our OpenLine incident reporting hotline is accessible to all DXC employees and contractors. **We are evaluating promoting accessibility to employees of our contractors as well.** We are exploring ways to do this safely and effectively.
- We currently offer supply chain transparency training to DXC colleagues. To increase awareness and expand efforts to fight modern slavery, we will consider offering this training to suppliers that are in high-risk countries or that perform high-risk activities. If this is effective, we may extend it to all DXC suppliers.
- In addition to the Responsible Supply Chain survey, we intend to **engage more deeply with providers of certain activities on a more frequent basis**, to better understand their operations and how DXC may prevent the risk of labor violations or modern slavery. While DXC does not know of any incidents, we would like to have a more detailed understanding of this risk in our operations.
- We are seeking to **strengthen our Responsible Supply Chain Principles** to include higher levels of responsibility for certain services and geographies. We

are always open to hearing more and better ways to improve our obligations and good citizenship.

- We will consider strengthening **assessments of modern slavery risk in due diligence processes**, such as supplier selection protocols and supplier KPIs.
- We will consider **pursuing external assessments and certifications**, such as Sedex or other programs that may help identify risks.
- We are aware that collaborating and partnering with responsible businesses may advance our program faster. With this in mind, we may **join industry forums or partner with NGOs to implement leading edge solutions**.
- We will consider whether to **extend the scope of our corporate responsibility screening survey to suppliers of different levels of DXC spend**, and whether to adjust the screening questions. This could accomplish two purposes: identifying fourth-party relationships of concern, and identifying suppliers who, through partnership, could help advance our efforts to combat modern slavery.

AUTHORIZATION AND AVAILABILITY

This Modern Slavery Statement was approved by the DXC executive leadership team on September 27, 2021, and was signed by Chris Drumgoole, executive vice president and chief operating officer, on September 27, 2021.

This statement will be posted on our DXC Technology website and submitted to the relevant authorities.



Chris Drumgoole

September 27, 2021

Executive Vice President and Chief Operating Officer

Learn more at
dxc.com/esg

About DXC Technology

DXC Technology (NYSE: DXC) helps global companies run their mission critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private and hybrid clouds. The world's largest companies and public sector organizations trust DXC to deploy services across the Enterprise Technology Stack to drive new levels of performance, competitiveness, and customer experience. Learn more about how we deliver excellence for our customers and colleagues at [DXC.com](https://dxc.com).