



## **Modern Slavery Statement 2019**

Diligenta Ltd. has been a business with a clear social commitment since it was founded 14 years ago. This commitment has shaped us ever since and that's why we're doing everything we can to make sure modern slavery has no part in the way we conduct business.

Being responsible is embedded through our values and behaviours, our leadership, management and operations. Diligenta fully supports the principles of the Modern Slavery Act, and we find any violation of human rights unacceptable. We are committed to promoting inclusive and rewarding experiences of employment for everyone.

This statement has been published in accordance with the Modern Slavery Act 2015.

It sets out the steps taken by Diligenta since the introduction of the Modern Slavery Act, and during the financial year which ended on 31st Dec 2018, to prevent modern slavery from occurring in our business operations and supply chains.

## About Diligenta

Diligenta, a UK-based, FCA regulated, wholly owned subsidiary of Tata Consultancy Services (TCS), is a leading provider of business process services for the Life and Pensions industry.

Established in 2005, Diligenta has a consistent track record of delivering operational transformation to the Life and Pensions industry. Diligenta delivers outstanding customer services and supports its clients both through operational service delivery and in launching new products and propositions. Our aim is to utilise our skills in operational excellence and our in-depth knowledge of life assurance, together with TCS' proven IT, Digital, Platform and delivery capability, to deliver transformation for our clients in a competitive market place.

## Assessment of Effectiveness in Preventing Modern Slavery

We are aware of the complex nature of modern slavery and acknowledge that it remains difficult to find and effectively remedy without addressing root causes. Diligenta is therefore committed to protecting and promoting the fundamental right of freedom of association within our business operations and supply chains. We recognise the role that freedom of association plays in protecting vulnerable people against modern slavery and other human rights abuses.

Diligenta has robust on-boarding (background checking) procedures for all of its employees. We are confident that the provision of bonded, forced or human trafficked labour would therefore be found as part of such processes. To-date Diligenta has had no concerns, suspected or otherwise, to call into question the validity and/or success of such checks. It continues to be the case that no incidents of potential bonded, forced or human trafficked labour have been brought to light in our organisation.

Our risk profile of eradicating modern slavery is, therefore, focused predominantly on our Supply Chain.

## Our Suppliers

Diligenta has a supplier population of circa 400. We manage suppliers across the business within two functions: IT and non-IT, enabling specialised individuals to focus on areas of expertise in combination with business requirements.

Whilst Diligenta manages IT and non-IT suppliers separately, we use a Board approved Supplier Management Policy, including an oversight framework to ensure that regulatory requirements, for example the Modern Slavery Act, are managed holistically within the Supplier Management Team.

All Diligenta suppliers are categorised using a tiered framework. This classification model forms the basis for the way in which suppliers are governed and overseen. Diligenta ensures that identified high risk suppliers adhere to the Modern Slavery Act by requesting a copy of their Modern Slavery Statements and periodic checks are undertaken for validity, confirmation and establishment purposes.

Our 4 tier Supplier Management oversight framework is as follows:

Category	Definition
<p><b>Tier 1</b></p>	<p>A supplier that is fundamental to the continuation of Diligenta’s business operations and/or...</p> <p>An extensive set of terms and conditions, in addition to a structured governance framework which enables proactive regular oversight and has access to personal or policy data as part of the Service provision and/or...</p> <p><b>A failure of the supplier would pose a significant risk to Diligenta’s operations.</b></p>
<p><b>Tier 2</b></p>	<p>A supplier that provides goods or services but if the relationship failed without warning Diligenta will continue to operate effectively and/or...</p> <p>It has a skeletal governance framework to enable oversight when required and/or...</p> <p><b>A failure of the supplier would pose a limited risk to Diligenta’s operations.</b></p>
<p><b>Tier 3</b></p>	<p>A compulsory supplier to Diligenta, which it requires to operate its business effectively, and, although key, it has a reactive risk framework due to the nature of the obligatory relationship and/or...</p> <p>It has a skeletal governance framework to enable oversight when required and/or...</p> <p><b>A failure of the supplier would pose a limited risk to Diligenta’s operations and/or...</b>  <b>Has direct or indirect access to Customer or Client data.</b></p>
<p><b>Tier 4</b></p>	<p>All other third party expenditure.</p>

# Policies and Contractual Controls

## For our Employees

Our employment policies comply, as a minimum, with all statutory employment rights which apply in the United Kingdom. They reflect our commitment to pay employees fairly and properly for their work and we continue to align our minimum pay rates to the Real Living Wage, set by the Living Wage Foundation.

The principle policies that we have in place, including our robust on-boarding background checking procedures severely limit the risk of slavery and human trafficking in the workplace from coming about and encourage all employees to work and act ethically and with integrity at all times. The following key policies (this list is by no means defined as being exclusive) which assist us in achieving this are:

- The Tata Code of Conduct;
- The Diligenta Code of Conduct Statement;
- Whistleblowing Policy and Confidential Disclosure;
- Modern Slavery Act Statement;
- Contracts of Employment;
- Health & Safety Policy; and
- Working Time Policy.

## For our Suppliers

We will not knowingly engage with a supplier involved in any form, suspected or otherwise, of modern slavery or human trafficking.

Since the Act came into force we have:

- Carried out a full risk-based review of all of our suppliers to identify those that may be impacted by any form of modern slavery or human trafficking in our direct supply chain;
- Embedded modern slavery into the ongoing due diligence framework within Diligenta to ensure Modern Slavery Statements are in place, where applicable with the requirements of the Act;
- Contacted low risk contracted suppliers to establish if a Modern Slavery Statement is in existence and, where not, ask that in order to maintain their supply to our organisation our Modern Slavery Statement is adopted;
- All new contracted suppliers are asked to provide a copy of their Modern Slavery Statement (if applicable) or indicate that they are aware of the requirements of the Act.

We take a zero tolerance approach to modern slavery or human trafficking in any form. If a supplier is seen to breach this policy, or is found to have any form of slavery or human trafficking in their business, or knowingly in their supply chain, we hold the right to terminate the product or services with immediate effect.

Where such information becomes known, we will not hesitate to blow the whistle on such illicit acts to the relevant authorities and will support any forthcoming prosecution this may entail.

## Modern Slavery Training

Since the introduction of the Modern Slavery Act, we have completed the following activities:

- Used it as an opportunity to embed greater understanding of human rights within our supply chains;
- Published our Modern Slavery Statement on our intranet for all employees, agency and third party workers to be able to view;
- Provided material on our intranet explaining more about modern slavery and human trafficking to raise awareness of this important issue;
- During 2018, we updated our Business Ethics training and test materials to include reference to modern slavery as well as ensuring employees understand how to report any concerns. All employees are required to complete this training on an annual basis;
- Added a new section in the 2019 Statement to provide details of the mechanisms which can be used to report any concerns regarding modern slavery.

## Reporting Mechanisms

Employees, agency workers, third party workers and suppliers with any concerns regarding modern slavery can report them through the following mechanisms:

Independent reporting service: [Safecall](#)

Telephone: [0800 915 1571](tel:08009151571)

On-line incident report: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

## Further Steps During 2019

We will continue to review and improve our approach in order to fulfil our commitment that modern slavery is not taking place in our supply chains or in our business. As part of this approach we will:

- Monitor the outcome of the independent review of the Modern Slavery Act 2015, which is due to be presented to the Home Secretary by the end of March 2019, and assess any impact on our existing policy, practices and procedures;
- Complete activity to contact low risk contracted suppliers to establish if they have a Modern Slavery Statement in-place and, where not, ask that in order to maintain their supply to Diligenta our Modern Slavery Statement is adopted;
- Monitor the risk of human trafficking and Modern Slavery within the entire Diligenta supply chain, encompassing all suppliers and carrying out relevant checks depending on the tier of the supplier.

## Approval of this Statement

As a fast growing and changing organisation, we continue to be particularly aware of emerging risks and be alert to the dynamic nature of both modern slavery and the impacts leading from our own operations. We continue to reflect on, develop and extend our approach to modern slavery across all of our supply chains and in the depth of all procurement and supplier management work.

Diligenta's Modern Slavery Statement 2019 is approved for and on behalf of the Board of Directors on 31st March 2019.

Signed

**Daniel Praveen**  
**Chief Executive Officer**

**Note:**

***\* Our previous Modern Slavery statements refer to Diligenta's financial year ending on 31st March. However, with effect from 31st December 2018, the financial year now ends at the end of December each year.***