



MODERN SLAVERY STATEMENT 2018/2019

Slavery, servitude, forced labour and human trafficking (modern slavery) are issues of increasing global concern, affecting all sectors, regions and economies.

Modern slavery is fundamentally unacceptable within our business and supply chains and is an important element in our overall approach to business and human rights.

Diligenta is committed to respecting, protecting and championing the human rights of all those who come into contact with our operations, including employees, suppliers, and local communities.

We accept our responsibility to support transparency and honesty; to find and resolve problems, and to work with others to protect the rights of workers, particularly those who are most vulnerable to abuses such as modern slavery.

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

It sets out the steps taken by Diligenta during the **financial year ending 31 March 2018** to prevent modern slavery in our business operations and supply chains from occurring.

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 our 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

Diligenta have 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 have had no concerns, suspected or otherwise, to call into question the validity and / or success of such checks. No case of potential bonded, forced or human trafficked labour has been brought to light in our organisation.

We are aware however 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.

We understand that success in this area is unlikely to be achieved by our Supply Chain working independently. As a long term believer in the values of Ethical Trading initiatives, we believe that the key to real progress is collaboration across all of our Suppliers and Trade Union partners as a whole.

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 to be undertaken for validity confirmation establishment purposes.

Our 4 tier Supplier Management oversight framework is as follows:

Category	Definition
<p>Tier 1</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>A failure of the supplier would pose a significant risk to Diligenta’s operations.</p>
<p>Tier 2</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>A failure of the supplier would pose a limited risk to Diligenta’s operations.</p>
<p>Tier 3</p>	<p>A compulsory supplier to Diligenta, which it requires to operate its business effectively, that 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>A failure of the supplier would pose a limited risk to Diligenta’s operations and/or Has direct or indirect access to Customer or Client data.</p>
<p>Tier 4</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 mean 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 do business 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;
- Identified suppliers are mandated to offer assurances that their business and supply chains were free from modern slavery; and
- **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 its introduction, we have used the Modern Slavery Act 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; and
- Provided material on our intranet explaining more about modern slavery and human trafficking to raise awareness of this important issue.

Further Steps

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:

- Design and develop specific training interventions for all employees to raise awareness and ensure they understand that they should report any modern slavery concerns and how to do this. This activity will include updating our existing mandatory Business Ethics training and test module which all employees are required to complete on an annual basis;
- Continue to review and, where necessary, improve due diligence and associated processes to manage the risk of modern slavery in both the workplace and supply chain respectively;
- Contact low risk contracted suppliers to establish if a Modern Slavery Statement is in existence and where not, ask that to maintain on their supply to our organisation, our Modern Slavery Act is adopted.

Approval of this Statement

As a fast growing and changing organisation, we need to be particularly aware of emerging risks and to be alert to the dynamic nature of both modern slavery and the impacts leading from our own operations. We will therefore 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 2018/2019 is approved for and on behalf of the Board of Directors on 31st March 2018.

Signed



Daniel Praveen
Chief Executive Officer