

# **DXC MODERN SLAVERY STATEMENT**

FY 2025

## Our commitment

DXC Technology Company, inclusive of our direct and indirect subsidiaries (DXC), prohibits all forms of slavery, human trafficking, forced labor, and child labor in our operations and supply chain and works to minimize any associated risks. Irrespective of the circumstances, we will not tolerate forced labor, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons in any of our own business operations or by any of DXC's suppliers, our supplier's suppliers (collectively, Suppliers), or for any other purpose.

DXC is a United Nations (UN) Global Compact signatory and supports the Ten Principles of the UN Global Compact, among them, supporting and respecting the protection of internationally proclaimed human rights; and ensuring DXC is not complicit in human rights abuses. We define our modern slavery commitments in our Human Rights Statement, our Code of Conduct (Code), and our Responsible Supply Chain Principles (Principles). This Modern Slavery Statement (Statement) reflects DXC's aspirations and efforts to be a principled and responsible corporation, in line with our values.

The Statement is also designed to be responsive to the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chain Act, the U.K. Modern Slavery Act, the Australian Modern Slavery Act, the German Act on Corporate Due Diligence in Supply Chains, the Californian Transparency in Supply Chains Act, and the Norwegian Transparency Act. It details the actions taken in the fiscal year ending on March 31, 2025.

## About DXC

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 to drive new levels of performance, competitiveness, and customer experience across their IT estates.

Every day we deliver excellence for our customers and colleagues across the globe. Our ability to serve our customers and earn their trust requires that our colleagues live the DXC Values every day:

- **Deliver.** We do what we say we are going to do.
- **Do the right thing.** We act with integrity.
- **Care.** We take care of each other and foster a culture of inclusion and belonging.
- **Collaborate.** We work as a team — globally and locally.
- **Community.** We believe in stewardship and building a sustainable company that supports our communities.

Learn more about how we deliver excellence for our customers and colleagues at [DXC.com](https://www.dxc.com).

## DXC structure, operations, and supply chains

DXC and our subsidiaries provide world-class IT services at scale, with globally distributed teams.

Our more than 121,000 employees in more than 60 countries are entrusted by our customers to deliver transformative technologies to ensure the success, safety, and well-being of businesses and people around the world.

We leverage the power of partnerships through our curated [DXC ecosystem of leading technology providers](#). By combining strengths and expertise globally, we create solutions and deliver greater outcomes for customers across their IT estates.

Approximately 98% of our employees are on regular or permanent contracts, with 51% in Asia Pacific, Japan, the Middle East, and Africa; 33% in Europe; and 16% in the Americas. English is the common language across our operations.

## Risk of modern slavery

DXC's activities are largely considered low risk for modern slavery and labor violations. DXC does not manufacture products, and our core activities are typically performed by a highly skilled and specialized workforce. This applies also to the types of activities that DXC procures, predominantly software and services.

We review human rights and modern slavery risks annually, which includes conducting due diligence in our internal operations and on our supply chain.

During our FY 2025 review of human rights and modern slavery risks, we identified the following risks:

Risk area	Risk	Risk level	Risk commentary
Operations	Risk of modern slavery among our own employees or contract staff	Extremely low	DXC hires highly skilled specialists through rigorous employment practices.
Supply Chain	Risk of modern slavery in suppliers located in countries at high risk for modern slavery	Low	Services procured by DXC require highly skilled specialists who are not typically at risk for modern slavery.
Supply Chain	Risk of modern slavery in services requiring low skill levels, such as security, catering, and janitorial services	Low	These services are performed onsite at DXC locations by outsourced suppliers who are required to adhere to our Responsible Supply Chain Principles, which includes modern slavery prevention practices.
Supply Chain	Risk of modern slavery in electronics procurement	Moderate	Electronics are a known high-risk commodity for modern slavery. DXC procures IT equipment from companies with robust modern slavery programs, including Dell Technologies, IBM, HP Inc., and Lenovo.

To assess risk levels, we reference the U.S. Trafficking in Persons Report and the U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor.

Mitigations for these risks are discussed below under the headings "Management of internal modern slavery concerns" and "Management of modern slavery concerns in our supply chain."

## Code of Conduct, policies, and procedures

At DXC, we deliver excellence for our customers and colleagues. Excellence means being truly the best — not only in what we do, but also in how we do it. The way in which we accomplish our goals is as important as accomplishing them. We strive for growth: growing ourselves, our teams, our customers, and our company. We know that growth is sustainable only if we achieve it the right way, consistent with our values, our Code of Conduct, and the law. Our employees work hard to establish and maintain a culture of delivering excellence with integrity, everywhere and every day. We believe that achieving high performance without integrity is unacceptable. Placing as much emphasis on *how*

we do things as on *what* we do reassures our customers, colleagues, business partners, and investors that they can put their trust in us.

We recognize the importance of providing our colleagues and business partners with resources and tools that help them do the right thing. To help guide decisions and achieve desirable outcomes, we have 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 and describe the high expectations we set for ourselves and our business partners. They provide a framework for ethical behavior in complex situations. Our local DXC entities are empowered to respond to local risks and issues. [DXC's Code of Conduct](#) (Code) and associated training identify and explain our policies, including those that help to combat modern slavery and promote fair labor practices.

Documents relevant to ethical behavior and human rights conduct are published on [DXC.com](#).

## Code of Conduct

The Code applies to all DXC employees, directors, officers, and executives, as well as subsidiaries and affiliates, business partners and suppliers, agents, and other representatives. DXC Integrity is responsible for implementing, maintaining, and overseeing compliance with the Code, internal policies, and the law.

The Code is available in 27 languages, with three new languages introduced in FY 2025. Annual training on the Code is mandatory for DXC employees and contractors. Training must be completed within 30 days of assignment. New hires are assigned the Code training within 3 to 4 days of joining and must complete it within 30 days of assignment. We insist on and achieve 100% completion.

Any violation of the Code, supporting policies, or the law may result in disciplinary action, up to and including termination, in accordance with applicable laws.

As part of the obligation to follow the Code, anyone who sees or suspects activity resembling modern slavery is expected to report it immediately to management, to DXC Integrity, or via DXC's confidential reporting channel, the [SpeakUp Line](#).

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

## Human Rights Statement

As a UN Global Compact signatory, DXC developed its Human Rights Statement in accordance with the tenets of the 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.

Our leadership and Board of Directors are committed to the protection and advancement of human rights and ensuring that our operations in communities around the world function with integrity. The DXC Human Rights Statement confirms our key commitments and principles and provides the framework for human rights and modern slavery commitments in our Code of Conduct and our Responsible Supply Chain Principles.

Our Human Rights Statement explicitly prohibits child labor in accordance with ILO Convention 138 and prohibits forced labor. Additional 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, business partners, 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

DXC's suppliers form an integral part of our sustainability strategy, which is why we established the DXC Responsible Supply Chain Principles (the Principles). The Principles speak to the commitments we make to our customers and the relationships we build based on trust and personal responsibility. They are part of our framework of standards for conducting business.

The Principles underpin our commitment to fostering sustainable business practices across our global network. We are serious about our environmental, social, and financial responsibilities, and we seek relationships with suppliers who also take these issues seriously. DXC expects suppliers to adhere to relevant national, regional, and international laws and standards.

The Principles cover six main categories:

- Respecting the basic human rights of our employees
- Enforcing labor standards and prohibiting child labor
- Prohibiting corruption and bribery
- Protecting the environment
- Anti-discrimination and inclusion
- Creating systems and processes to ensure success in these areas

Our suppliers are required to adhere to the Principles. We expect suppliers to introduce suitable processes and controls within their organizations to support compliance with applicable laws and regulations, and drive continuous improvements related to the requirements laid out in these Principles. Our goal is to work with our suppliers to ensure full compliance with these Principles, which includes a requirement that they apply the Principles to their own suppliers, with whom they work to deliver goods and services for DXC.

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

## Management of internal modern slavery concerns

As previously stated, DXC prohibits any form of slavery, human trafficking, forced labor, or child labor. We are committed to complying with laws prohibiting such exploitation. Internally, we have implemented various initiatives to prevent, identify, and — if violations are found — address and remediate modern slavery concerns.

## DXC SpeakUp Line reporting channel

The DXC Values, Code of Conduct, and policies set the expectation that employees, and anyone working with or on behalf of DXC, should seek advice and report misconduct, including that related to modern slavery — whether witnessed or suspected.

We strive to create an inclusive, supportive culture that encourages speaking up without fear of retaliation. DXC does not tolerate direct or indirect retaliation against anyone seeking advice or reporting a concern.

DXC provides several channels for people to seek advice or report concerns. These channels include:

- The relevant employee's supervisor, their supervisor's manager or any other individual in the management chain
- SpeakUp Line at [www.speakupdxc.com](http://www.speakupdxc.com)
- SpeakUp mailbox at [speakup@dxc.com](mailto:speakup@dxc.com)
- Human Resources Employee Connect
- DXC Response Operations Center (DROC)

The SpeakUp Line also allows employees to report without revealing their identity (subject to local law). The option to remain anonymous using the SpeakUp Line is available by phone, web portal, or mobile app. The DXC SpeakUp Line is also open to our suppliers, contractors, and their employees.

DXC Integrity oversees the various platforms and channels for DXC employees, contractors, and others to raise questions or concerns, and help with the early identification and management of issues.

## Internal assessment

While we believe the risk for modern slavery in our operations is extremely low due to the highly skilled labor we employ, we undertake an annual internal audit to examine employee housing and payroll records to identify areas of potential modern slavery concern. The last audit was conducted in February 2025.

As a first step, we screen bank account information looking for cases where multiple employees share a bank account, which could indicate instances where employees are not in control of their earnings. We specifically review payroll systems of countries in which we operate that are known to be of high risk for modern slavery and look for incidents where three or more employees share bank accounts (considering that it is not uncommon for spouses to be employed by DXC). In the FY 2025 audit, we found no such instances.

Our findings support our belief that DXC's business model is one of extremely low modern slavery risk. Regardless, we evaluate our internal modern slavery practices annually by participating in an online modern slavery self-assessment to identify opportunities and learn of new safeguards that could help strengthen our practices.

## Training

DXC offers human rights training to all employees through our online learning portal, DXC Learning. On DXC Learning we maintain an Environmental, Social, and Governance (ESG) academy, which includes general and country-specific training on modern slavery (e.g., Australia, Canada, and U.K.). We also provide a variety of courses to reinforce our inclusive culture.

## Effectiveness and performance indicators of internal modern slavery prevention

While our business operations and activities are considered to present a very low risk for modern slavery, we are committed to minimizing the risk of all forms of forced labor and human trafficking within our global business. We monitor our effectiveness in combatting modern slavery in our operations through the following key performance indicators:

- **Percentage of staff completing Code of Conduct training.** DXC requires employees to complete our mandatory Code of Conduct training annually. In FY 2025, 100% of employees completed the training.
- **Number of modern slavery concerns raised across all channels.** In FY 2025, no reports of internal modern slavery were raised.

## Management of modern slavery concerns in our supply chain

DXC is dedicated to ethical and legal business practices. In FY 2025, we invested in an artificial intelligence (AI)-enabled platform to enhance the end-to-end visibility of our supply chain.

Management of modern slavery concerns in our supply chain consists of three practices: (1) supplier selection criteria requiring certain standards of social, environmental, and ethical behavior; (2)

cascaded human rights requirements through our Responsible Supply Chain Principles; and (3) annual supply chain monitoring of higher-risk suppliers for effective human rights protection practices.

## Supplier selection criteria

DXC carefully considers economic, process, and technical criteria when making procurement decisions, which include essential social, environmental, and ethical responsibilities such as human rights, labor conditions, anti-corruption concerns, and environmental protection.

## Human rights protection requirements

As part of our efforts to comply with laws and regulations related to modern slavery, we address modern slavery in our purchase order terms and conditions, and we have addressed it in our Responsible Supply Chain Principles (the Principles) since 2018. These commitments will be more deeply embedded throughout our supply chain as we renew contracts.

We require our suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses, as defined by laws or otherwise identified by international human rights organizations and conventions. Our suppliers are required to adhere to the Principles. We routinely assess the performance of our key suppliers and evaluate compliance with the Principles.

The Principles are publicly available on DXC's website. Suppliers are encouraged to report concerns about noncompliance with the Principles through DXC's SpeakUp Line.

## Annual supply chain monitoring

DXC conducts annual modern slavery due diligence on its higher-risk suppliers to assess potential risks or instances of modern slavery in our supply chain. In FY2025, we implemented an AI-enabled platform to monitor ongoing human rights risks of our higher-risk suppliers. This group includes DXC's largest suppliers (top 75% by spend) and suppliers operating in geographies or industries that are at high risk for modern slavery (as noted in the risk assessment on page 3). We evaluate suppliers against the requirements of the DXC Responsible Supply Chain Principles. Compliance with the Principles, which includes upholding human rights and modern slavery prevention, monitoring, and, if necessary, remediation practices, is a contractual obligation for suppliers.

In FY 2025, 188 suppliers were identified for modern slavery due diligence. Our AI-enabled platform that we use for monitoring modern slavery concerns in the supply chain has identified no direct or indirect supply chain concerns for our 188 higher-risk suppliers. Further, 78% of our highest-risk suppliers (those operating in the IT hardware industry and those in high-risk countries with whom DXC spends over \$1 million annually) have publicly available Modern Slavery Statements describing their exemplary efforts to prevent modern slavery in their supply chains. Using our AI-enabled due diligence platform, we continuously monitor these suppliers throughout the year and have more visibility into our indirect supply chain.

## Effectiveness and performance indicators of modern slavery prevention in our supply chain

We are committed to minimizing the risk of all forms of forced labor and human trafficking within our global business and supply chain. We monitor the effectiveness of supply chain management through the following key performance indicators:

- **Percentage of high-risk suppliers.** Fewer than 2% of DXC's suppliers fall into the risk categories defined in the risk assessment on page 3, a level we deem acceptable as a global company operating in the IT services industry.



- **Number of suppliers with active modern slavery violations.** In FY 2025, DXC received no reported concerns or evidence that situations of active modern slavery were present in our supply chain.

## Investigation, remediation, and mitigation of modern slavery concerns

DXC Integrity, a strategic global corporate function, manages and oversees our Ethics & Compliance, Third-Party Risk Management, and Global Data Protection programs. These are designed and implemented to help prevent, detect, and respond to actual or potential misconduct, which includes modern slavery and human rights issues.

DXC Integrity's overarching strategic objective is to promote a culture of performance with integrity that encourages ethical conduct, reinforces corporate values, and drives compliance with the Code of Conduct, internal policies, and the law.

DXC Integrity is led by the vice president and chief ethics and compliance officer (CECO), who reports to the executive vice president and general counsel. The CECO is also DXC's designated human rights officer. Independence from management is assured through the CECO's indirect reporting to the Audit Committee of DXC's Board of Directors.

DXC Integrity oversees the various reporting channels mentioned earlier, which facilitate the ability of DXC employees, suppliers, contractors, and others to raise questions and concerns and help with the early identification and management of issues. These platforms and channels can and should be used for reporting concerns about modern slavery and other human rights abuses. The DXC SpeakUp Line is also open to our suppliers, contractors, and their employees. Reports are reviewed regularly by DXC's Integrity Committee. The Integrity Committee comprises members of the executive leadership team.

If DXC becomes aware of any modern slavery concern, internally or with a supplier, DXC Integrity will investigate, partner with internal organizations to remediate, and ensure mitigations are implemented to prevent recurrence. DXC Integrity has a dedicated team of trained investigators across the globe responsible for conducting investigations. Further, DXC Integrity has a formal issue management process and methodology, leveraged to drive required remediation and mitigation.

## Continual improvement

As a UN Global Compact signatory, we continue to enhance our human rights efforts; learn from the best practices of our partners, governments, and nongovernmental organizations (NGOs); and act as a role model for our suppliers and our communities.

To ensure the prevention of human rights violations across our operations and supply chain, we assess and enhance our internal and external processes to maintain best-in-class assurances.

## Improvements from last year

Over the past year, the following improvements were implemented:

- We invested in an AI-enabled platform to continuously monitor and enhance the end-to-end visibility of our supply chain, expanding due diligence monitoring to our indirect supply chain
- We started reporting in compliance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act
- We launched an Integrity Working Group composed of subject matter leaders across the organization to better enable compliance and risk efforts within the company
- We published our Code of Conduct in three additional languages, making it now available in 27 languages



## Future actions

We continuously evaluate our human rights initiatives alongside industry best practices to identify ways to prevent the occurrence of modern slavery within DXC's supply chain. In FY 2026, we anticipate screening new suppliers for human rights issues prior to onboarding, and, in parallel, formalizing a response process should we identify an instance of modern slavery in our supply chain.

## Other efforts: DXC as a responsible citizen

As an IT services company, DXC uses the power of technology to build better futures for our customers, colleagues, environment, and communities. We are committed to living our values: Deliver, Do the right thing, Care, Collaborate, and Community. DXC contributes to charities, nonprofits, and social enterprises and is committed to fostering a diverse and inclusive culture.

We are proud of our extensive and active Employee Resource Groups, which are open to all employees. More than 20 affinity groups with regional chapters in the Americas, Asia Pacific, and Europe create and nurture a safe and welcoming workplace environment where all employees are valued. These groups bring our values to life and help make DXC an employer of choice.

In partnership with 12 NGOs in India, DXC has implemented 13 social responsibility projects that have positively impacted the lives of approximately 880,000 individuals nationwide. The Skill Development and Employability Program, which serves 117,000 individuals, provides training in skills that are critical for today's employment market. The 2024 – 2025 Scholarship Program, which nurtures 383 students in science, technology, engineering, and mathematics (STEM) fields and sports, not only promotes academic and athletic success but also develops future leaders in these disciplines. Further initiatives, such as the school transformation program, inclusive education, and career assistance, have helped improve the quality of education in government schools. Digital resource centers serve as important hubs for digital literacy and information access. Additional initiatives such as Skill Development of Persons with Disabilities and the Underserved, as well as targeted STEM-training and the Assistive Technology program, demonstrate a commitment to inclusivity and empowerment while addressing the unique needs of underserved communities. These collaborative efforts are critical to creating a society in which everyone, regardless of background, has the opportunity to succeed and contribute effectively in their communities and beyond.

At DXC, we are reimagining neurodiversity. For over 10 years, the DXC Dandelion Program has helped individuals on the autism spectrum build valuable IT skills and careers. The program combines robotics with commercial IT industry teaching and methodologies to help participants develop technical, life, and executive functioning skills. For the DXC Dandelion Program, we recruit neurodivergent people and provide them with comprehensive career guidance, onsite support, and training, matching their skills to DXC's customer organizations. The program helps neurodivergent people build careers while helping our customers meet their IT needs with the support of highly skilled and dedicated team members. The DXC Dandelion Program has grown to more than 26 teams of neurodivergent colleagues in Australia, the United Kingdom, Poland, Bulgaria, and the Philippines. In FY 2025, we launched the program in Italy as well, and it is under development in the Middle East and the United States.

Our U.K. Social Value Practice strives to contribute to a better world through impact-driven programs — for people, for our planet, and to protect our supply chains. In FY 2025, we employed our fifth cohort of employees in the DXC Dandelion Program in the U.K., adding six new trainees to our existing program, bringing our total across all five cohorts to 38, with 13 of these having completed the program and begun working for the business full time. We continued to impact the lives of more than 100 young people via the Digital Futures Academy, a 4-year education program for secondary-school students in the Greater Manchester and Erskine areas. As of February 2025, we employ 210 apprentices, providing young people and current DXC employees the opportunity to train and upskill. Seventy-one of these are new apprenticeships commenced during FY 2025. A total of 93 apprentices

completed their qualifications during the year. In FY 2025, we also leveraged our membership in the Green Software Foundation (an NGO that provides technology companies with standards and tools for building and delivering more energy-efficient, lower-carbon technology solutions) to certify more than 120 of our employees as Green Software Practitioners. We support green software by treating it as a core design principle, training our employees to be certified Green Software Practitioners, and engaging with the Green Software Foundation's working groups and projects. During FY 2025, DXC was also recognized for its efforts promoting and delivering projects related to the circular economy, receiving a nomination as a finalist for the Circular Company of the Year Award at the CRN Sustainability in Tech Awards.

DXC is proud to be recognized as a leading company for corporate citizenship. We were named on *Newsweek's* list of America's Most Responsible Companies 2024 for environmental, social, and corporate governance performance. Sustainalytics classifies DXC as an ESG Industry Top Rated company, and MSCI rates DXC's ESG performance as AA (on a scale of AAA – CCC). Disability:IN and SAP named DXC the 2024 Autism Inclusion Company of the Year.

## Related policies and documents

[Responsible Supply Chain Principles](#)

[Human Rights Statement](#)

[Code of Conduct](#)

[SpeakUp Line](#)

[Health and Safety Policy](#)

[DXC Values](#)

## Authorization and availability

This Modern Slavery Statement is available to all DXC employees, works councils, suppliers, and the public. It is posted on our public DXC website as well as via internal communications channels and is submitted to the relevant authorities.

This Statement was approved by DXC's Board of Directors on May 6, 2025.



David Barnes  
May 8, 2025 2:07 PM EDT

David Barnes

Director and Chair of the Nominating/Corporate Governance Committee of the Board of Directors of DXC Technology Company



Learn more at  
[dxc.com/esg](https://dxc.com/esg)

**DXC Technology**  
[DXC.com](https://dxc.com)

#### 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 to drive new levels of performance, competitiveness, and customer experience across their IT estates. Learn more about how we deliver excellence for our customers and colleagues at [DXC.com](https://dxc.com).

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