

UST Global

Slavery and Human Trafficking Statement

This statement sets out the steps that UST Global Private Limited, in conjunction with other UST Global group companies, has taken and will continue to take to prevent modern slavery and human trafficking in its business and supply chain in accordance with the UK's Modern Slavery Act 2015.

UST Global has a zero tolerance approach to any form of modern slavery and human trafficking. In this statement that term includes, including all forms of slavery, servitude and forced or compulsory labour and human trafficking.

We are committed to acting in an ethical manner, with integrity and transparency in all business dealings. We are committed to creating and maintaining effective systems and controls to safeguard against any form of slavery taking place within the business or our supply chains.

OUR BUSINESS & STRUCTURE

UST Global Inc is a multinational provider of IT services and solutions. It is headquartered in Aliso Viejo, California, United States and it has additional operations in India, Mexico, UK, Malaysia, Philippines, Singapore, and Poland. UST Global Private Limited is the UK legal entity within the UST Global group of companies.

We specialise in healthcare, retail & consumer goods, banking & financial services, telecoms, media & technology, insurance, transportation & logistics and manufacturing & utilities.

We have over 22,000 employees worldwide.

OUR SUPPLY CHAINS

Our supply chains include contractors, software and IT hardware supplies, professional services and office equipment and facilities

UST Global's various group companies, notably in India, also supply employees to other companies within the group.

We have reviewed our supply chains and concluded that the services we provide, and the supplies we require to provide those services, are unlikely to involve modern slavery and human trafficking. However, we continue to be mindful of the impact on society of modern slavery and human trafficking and we will continue to take steps to ensure it does not occur within our supply chains.

OUR POLICIES

We operate a comprehensive Code of Business Ethics throughout UST Global as part of our commitment to conducting business honestly, fairly and in an ethical and transparent manner at all times.

We are committed to complying with the laws and regulations of the cities, states and countries in which UST Global operates. Every employee, worker, contractor, vendor and supplier is expected to comply with all applicable laws, rules and regulations.

The manner in which our employees, contractors and suppliers conduct themselves is a reflection of our core values, which are more valuable than any service or product we sell – they are the key to our long-term success.

Our current Code of Business Ethics sets out our position on anti-bribery and anti-corruption, antitrust and competition, insider trading, labour and employment laws and conflicts of interest. We will be taking steps to incorporate our policy on modern slavery and human trafficking into the next revision of our Code of Business Ethics.

UST Global provides global access to a confidential and anonymous values and whistleblowing hotline for the reporting of any violation or suspected violation of the Code of Business Ethics.

OUR ACTIONS

We have in place systems to conduct due diligence on all suppliers before engaging with them, identify and monitor our supply chains, assess potential risks within them, mitigate any such risks and protect any whistle blowers. We will continually seek to implement enhancements in those systems.

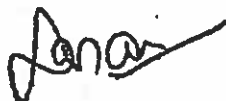
We are supplementing our existing systems and procedures with additional due diligence steps to ensure the integrity of our supply chains. This has to date included questioning suppliers on their approach to modern slavery and human trafficking issues to allow us to assess their level of understanding of the issues and what steps they are taking in respect of their own supply chains.

We already require our suppliers to comply with all applicable laws and we intend to specifically to require our suppliers, as part of our contracts with them, to confirm to us that they will comply with all applicable anti-slavery and human trafficking laws.

OUR COMPLIANCE TEAM

As with our Code of Business Ethics, our CEO shall ultimately be responsible for ensuring that UST Global Inc takes appropriate steps to comply with all applicable anti-slavery and human trafficking laws. Day-to-day compliance will be the responsibility of Legal, Human Resources, Procurement and Sales.

Signed



Sajan Pillai

Director

March 31, 2019