



# **DXC Responsible Supply Chain Principles**

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## DXC Responsible Supply Chain Principles

At DXC Technology, we consider sustainability to be an essential component of our business processes in areas from corporate and social responsibility to sound business ethics. As a technology group, 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.

Our suppliers are an integral part of our sustainability strategy. In all our procurement activities, we take 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. This is why we have established the DXC Responsible Supply Chain Principles. These Principles speak to the commitments we make to our customers and our relationships built on trust and personal responsibility. They establish the standards required for conducting business with DXC. DXC's own Human Rights Statement was developed following 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.

We expect our suppliers to introduce suitable processes within their organizations that support compliance with applicable statutes and that drive continuous improvements with regard to the requirements laid out in these Principles.

**Our goal is to work with our suppliers** to ensure full compliance with these Principles, as they in turn apply them to their own suppliers with whom they work to deliver goods and services for DXC. We will consider these Principles in our selection of suppliers, and DXC reserves the right to monitor supplier processes and procedures against these Principles as part of DXC's ongoing Responsible Supply Chain Program.

Where applicable, suppliers must participate in surveys and information gathering and must allow audits if required by DXC. Suppliers are expected to follow programs of improvement, including remediation if required, and must accept, if necessitated, the possibility of termination of the contract.

### 1 Human Rights

**Human Rights.** DXC requires its 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 law or otherwise identified by international human rights organizations and conventions.

**Harassment, Harsh or Inhumane Treatment.** DXC expects its suppliers to create and maintain an environment that treats all employees with dignity and respect, and not to engage in any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse in the conduct of its business. No harsh or inhumane treatment, coercion or corporal punishment of any kind is to be tolerated by a supplier in the conduct of its business, including concerning its business with any of its suppliers.

**Health and Safety.** DXC requires its suppliers to follow all applicable laws and regulations to ensure a safe and healthy workplace for all personnel, including the personnel of any of their suppliers. This includes mitigating potential as well as actual health and safety risks at work.

Suppliers will provide the same standard of health and safety in any housing that they provide for their employees. At a minimum, suppliers should strive to implement recognized workplace systems, procedures and controls for the health and safety of all personnel in compliance with nationally and internationally recognized standards.

To further ensure the health and safety of personnel, suppliers should have clear programs and policies to identify potential emergency situations and their handling. Emergency drills must be executed at least annually or as required by local law, whichever is more frequent. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

Suppliers will provide personnel with health and safety information and training in the mother tongue of the worker or in a language the worker can understand. Health and safety information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. As applicable, training will be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

**Wages and Benefits.** DXC requires its suppliers to comply with all applicable wage and working hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide all applicable legally mandated benefits. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

**Working Hours.** DXC requires that its suppliers will not exceed prevailing local work hours and will appropriately compensate workers for overtime. Workers shall not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their written consent. All overtime must be voluntary. In countries where the maximum workweek is shorter than 60 hours, that standard shall apply. Employees should be allowed at least 1 day off per 7-day week.

**Conflict Minerals.** DXC requires its suppliers and their suppliers, where they supply products containing tantalum, tin, gold or tungsten, or their ores, to be in full compliance with the U.S. Conflict Minerals Law and the EU Conflict Minerals Regulation and in line with the Organisation for Economic Co-operation and Development (OECD) Guidance. DXC expects that its suppliers and their suppliers shall provide such further cooperation as DXC may reasonably require in order to meet any obligations it may have under conflict minerals regulations.

## 2 Labor

DXC requires suppliers to respect and comply with the fundamental rights granted to all employees under applicable national statute. Furthermore, DXC expects its suppliers to fully recognize the labor standards issued by the International Labour Organization (ILO), taking into due account the applicable laws and regulations in different countries and at different sites.

Suppliers must abide by DXC policies relating to modern slavery, human rights and labor. Suppliers must enable confidential reporting of concerns or incidents and communicate this facility appropriately to their staff and their own suppliers. Suppliers must participate in and train supplier staff in these and other DXC policies as relevant.

**Freedom of Association and Collective Bargaining.** DXC requires its suppliers and their suppliers to recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed.

**Forced or Involuntary Labor.** DXC requires that its suppliers and their suppliers do not and will not use any forced, bonded or indentured labor or involuntary prison labor. All work, including overtime work, will be voluntary, and workers should be free to leave upon reasonable notice. Suppliers will not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.

**Human Trafficking.** DXC does not tolerate any form of human trafficking or exploitation of staff employed directly by suppliers or through a recruitment agency. DXC expects its suppliers to adhere to the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially in Women and Children.

**Child Labor.** DXC suppliers will not use child labor in any form within their organization, in line with the ILO Conventions.

**Discrimination.** DXC does not tolerate any form of discrimination in hiring and employment practices on the grounds of race, color, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status. DXC expects that its suppliers and their suppliers will align to DXC's no-discrimination policies, including as they relate to access to training, promotion and rewards.

### 3 Ethics and Compliance

DXC has a zero-tolerance policy for its employees and suppliers toward corruption, bribery and any unfair practices. This policy goes above and beyond the local regulations, and any breaches may be met with sanctions including the termination of the relationship.

**Corruption.** DXC requires its suppliers and their suppliers to adhere to the highest standards of moral and ethical conduct in line with all UN and OECD conventions against corruption, and to comply with all local laws and regulations as they relate to fair business practices.

Suppliers are expected to ensure that their employees, subcontractors and agents do not engage in any form of corrupt practices, such as extortion, fraud or bribery with the goal of securing an order award or any other form of preferential treatment in their business transactions.

**Disclosure of Information.** Information regarding the supplier's activities, including financial situation and performance, should be in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable and may result in suspension or termination of the relationship. This includes disclosures on surveys, audits, verifications and programs.

**Protection of Identity and Non-Retaliation.** Suppliers will maintain programs to ensure confidentiality, anonymity, and protection of supplier and employee whistleblowers, unless prohibited by law. Suppliers should have facilities and processes in place whereby personnel or members of the public can raise concerns without fear of retaliation.

**Privacy Protection.** DXC and suppliers will comply with all laws regarding protection of the privacy of stakeholders including suppliers and their personnel, DXC, its employees and its customers. This includes information gathered in the normal course of activities as well as any transmission, storage, processing or sharing.

**Intellectual Property.** DXC requires that suppliers comply with all applicable laws and highest industry standards regarding intellectual property rights.

**Conflict of Interest.** Suppliers are expected to disclose to DXC (and indirect suppliers are expected to disclose to supplier, for further disclosure to DXC): (i) any situation that may appear

as a conflict of interest; and (ii) any DXC employee or other professional under contract with DXC who may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

**Gifts and Hospitality.** DXC does not accept inducements or gifts (other than items of small value such as calendars or other token items). DXC will accept only that which it deems to be "reasonable and proportionate" hospitality and will not allow hospitality to influence a business decision or to lead to unfair business advantage. DXC expects its suppliers to align to these Principles in their business dealings with DXC, their suppliers, and any other persons related to business activities by, for or on behalf of DXC.

## 4 Environment

DXC requires its suppliers and their suppliers to implement responsible environmental policies in accordance with all applicable local, national and global environmental laws, such as requirements around greenhouse gas emissions, use of chemicals and hazardous materials, waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. We expect that our suppliers operate their facilities with consideration and protection of biodiversity impacts including land, forest, soil, flora and fauna, water, animal welfare and habitat preservation, air quality, and noise and light pollution.

Suppliers are expected to develop procedures to minimize their impact on the environment in accordance with principles 7, 8 and 9 of the UN Global Compact, as follows:

- Support a precautionary approach to environmental challenges
- Undertake initiatives to promote greater environmental responsibility
- Encourage the development and diffusion of environmentally friendly technology

Suppliers must also comply with any additional environmental requirements specific to the products or services being provided to DXC as called for in design and product specifications, and contract documents. Suppliers are required to implement appropriate management systems to meet these requirements.

**Reducing Consumption of Energy.** Suppliers will have programs in place to minimize energy consumption in line with DXC requirements.

**Greenhouse Gas (GHG) Emissions.** DXC expects its suppliers and their suppliers to, as part of a responsible environmental policy, measure, monitor and report material sources of GHG emissions. Suppliers should set targets to reduce GHG emissions in line with international standards, and externally report their progress.

**Water Use and Management.** DXC expects suppliers to implement a water management program that will monitor and help minimize usage. The program will also aid in monitoring and improving where necessary the discharge of water and wastewater.

**Pollution.** DXC expects its suppliers and their suppliers to investigate possible sources of known air, land and water pollutants and to implement controls to prevent pollutant release in excess of environmentally prudent limits as dictated by local law and generally accepted environmental conservation standards. Suppliers will have policies for remediation of damage and fair treatment of stakeholders and those impacted by such incidents.

**Waste.** DXC requires its suppliers and their suppliers to establish and maintain controls designed to minimize waste and its impact throughout the supply chain, including the production and packaging of waste and end-of-life treatment of products, encouraging recycling and reuse at all stages. These activities are to be in line with DXC's policies and programs, including its IT Asset Disposal program.

**Hazardous Materials.** DXC expects its suppliers and their suppliers to establish and maintain controls to eliminate hazardous substances and materials from products and services, and to promote the use of suitable alternatives, whenever practicable. Where substitution is not possible, suppliers will distribute information on product hazardous substances as well as appropriate handling instructions for safe end-of-life treatment and disposal.

**Preservation of Resources.** DXC requires all its suppliers and their suppliers to establish and maintain controls to minimize the use of non-renewable and scarce resources in the supply chain. Suppliers should source and promote renewable and more abundant substitutes whenever practicable. DXC may require programs and verification to ensure the move to sustainable resource selection practices.

## 5 Equality, Diversity and Inclusion

**Diversity.** It is the policy of DXC to affirmatively seek the participation of small businesses, small disadvantaged businesses, minority-owned, woman-owned, veteran-owned, disabled-owned, LGBTQ-owned small business concerns, as well as other similar groups in the performance of subcontracts and procurements. DXC expects its suppliers to be similarly aligned, including concerning the selection of their suppliers. DXC reserves the right to require suppliers to follow these Principles with activities, and to require reporting on these activities and results.

**Unrestricted Competition.** DXC requires suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter into agreements with competitors that might constitute a breach of antitrust law, or to take advantage of any dominant market position they might hold.

## 6 Corporate and Management Systems

DXC requires suppliers to have appropriate management systems that ensure compliance with applicable laws and regulations, with DXC requirements, and with these Principles. These are expected to include but are not limited to the requirements defined below.

**Reputation Protection.** DXC requires that suppliers not participate in any activities that may diminish or harm the reputation of DXC or its customers in the eyes of DXC, its stakeholders or the public. DXC reserves the right to terminate the supplier relationship due to any situation that may bring disrepute to DXC.

**Risk Management.** DXC requires suppliers to identify and manage legal, health and safety, labor, environmental, reputational, ethical, and financial risks in their activities. Suppliers are expected to inform DXC of relevant risks upon discovery and take actions to remedy them.

**Policy and Program for Business Continuity.** DXC requires that suppliers maintain business continuity plans for their dealings with DXC. These plans include how to ensure required delivery of services and products, and recovery of information and systems if applicable. DXC will work with suppliers to develop these plans and capabilities.

**Implementation and Monitoring Progress.** DXC requires suppliers to implement programs in line with these Principles. These programs and progress will be monitored during the relationship with DXC. DXC expects suppliers to cooperate by correcting any deficiencies or gaps.

**Training.** DXC requires suppliers to provide appropriate training for managers and workers in order to implement these Principles.

**Communication with Suppliers.** DXC expects suppliers to have processes for communicating these requirements to their own suppliers, and to have processes for monitoring compliance with these Principles and the supplier's own policies.

DXC is committed to these Responsible Supply Chain Principles. As such, DXC expects that its employees and everyone working with, or on behalf of, DXC will seek advice related to business ethics and conduct policies and raise concerns regarding known or suspected misconduct. In this context, "misconduct" is any action inconsistent with our values or which would violate the above principles, DXC policy, or the law.

DXC's SpeakUp! (mailbox, [speakup@dxc.com](mailto:speakup@dxc.com)) program provides various channels for employees and representatives to ask questions and submit concerns. Such reports may be made openly, confidentially, and/or anonymously, as allowable by law, to:

- DXC's Ethics & Compliance mailbox, [ethics@dxc.com](mailto:ethics@dxc.com)
- OpenLine, DXC's always available, confidential, anonymous, toll-free and web-enabled advice and reporting channel





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### 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).

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