

Modern Slavery and Human Trafficking Statement

Introduction

Modern Slavery and Human Trafficking Statement has been developed by HFCL Limited (hereinafter referred as “**HFCL**” or the “**Company**” or “**we**”), a leading technology enterprise with operations in high end Telecom and Defence Equipment, Optical Fiber and Optical Fiber Cables and also in creating digital networks for telcos, enterprises and governments. The Statement sets out the steps taken by HFCL during the financial year 2019-20 and onwards to prevent modern slavery in its business and value chain.

Our Position

HFCL is committed to prevent any form of modern slavery, servitude and human trafficking, as well as forced or compulsory labour. HFCL actively supports human rights and conducts its business in line with Modern Slavery Act, 2015, (Government of UK) and in alignment with the principles of the United Nations Human Rights, ILO Guidelines on Human Trafficking and Forced Labour Exploitation and the Convention on Human Rights. We also support the principles of the United Nation Sustainable Development Goals (UN SDGs) -Agenda 2030.

Our business and supply chain

HFCL is a leading technology enterprise with operations in high end Telecom and Defence Equipment, Optical Fiber and Optical Fiber Cables and also in creating digital networks for telcos, enterprises and governments. As an integrated telecom infrastructure provider, it delivers innovative, customized and competitively priced end-to-end telecom solutions. Over the years, HFCL has emerged as a trusted partner offering sustainable high-tech solutions with a commitment to provide the latest technology products to its customers. Our strong R&D expertise coupled with our global system integration services and decades of experience in fiber optics enable us to deliver innovative digital network solutions required for the most advanced networks.

The Company’s in-house R&D Centers located at Gurgaon, Bengaluru and Hyderabad along with invested R&D houses and other R&D collaborators at different locations in India and abroad, innovate a futuristic range of technology products and solutions.

HFCL has developed capabilities to provide premium quality Optical Fiber and Optical Fiber Cables, state- of-the-art telecom products including 5G

Radio Access Network (RAN) products, 5G Transport Products, Wi-Fi Systems (Wi-Fi 6, Wi-Fi 7), High Capacity Backhaul Radios, Switches, Routers and Defence electronics products viz. Thermal Weapon Sights, Electronic Fuzes, High-Capacity Radio Relay and Surveillance Radars.

HFCL operates advanced manufacturing facilities in Hyderabad, Goa, Chennai (through its subsidiary HTL Ltd.) and Manesar for telecom and networking products, and Hosur for defence equipment. HFCL has worldwide customers with exports to more than 60 countries.

The HFCL Group consists of several companies and an experienced and talented human capital of more than 3,200 employees as of March 31, 2025.

Securing a sustainable supply chain is vital in our strategy to deliver value to our customers and contribute to sustainable development. We are implementing a Group-wide Code of Conduct for Suppliers with requirements within the following areas: Environment, Human Rights (eradication of discrimination, avoiding child labour), Fair Employment Terms (reasonable employment conditions, avoidance of slavery, freedom of association), Health and Safety (working environment, safety) and Anti-Bribery and Anti-Corruption.

Our policy on avoidance of slavery

At HFCL, we do not take part in any form of slavery which entails forced labour, trafficking and/ or non-volition of labour in any form. Employees are free to leave their respective workplace at the end of the day and to end their employment after a reasonable period of notice in line with applicable laws or contracts. Employees are not forced to deposit money nor original identity documents with HFCL during joining or exit from the Company.

Supplier due diligence, risk assessment, and monitoring

HFCL deems no risk of modern slavery and human trafficking in its own business nor across the supply chain. The Company sources all its raw materials and services from reputable suppliers located not only across Europe, Asia and North America but also locally within India.

We recognize that risks can exist within any supply chain and, as such, we continuously track and monitor our suppliers, both international and domestic, through a robust due diligence process. This ongoing vigilance helps ensure that our operations and procurement practices remain free from modern slavery and human trafficking.

We have conducted a review of our suppliers, and have not identified, nor do we foresee any risk related to modern slavery or human trafficking. Further desktop and onsite audits will continue throughout the year and additional KPIs for the sustainable supply chain management have been introduced and measured from the year 2020. Personnel in specific purchasing positions also undergo specialized training on sustainability issues in the supply chain, including the area of modern slavery, human trafficking, forced or compulsory labour, child labour, and other human rights issues and related topics.

We regularly conduct audits and random spot checks of our suppliers to monitor compliance with HFCL expectations, statutory compliances, and legal requirements. If any issues are identified during an audit, the supplier is required to prepare a corrective action proposal/ plan and resolve all violations within an agreed time period.

We urge our suppliers to report any violations of our Code of Conduct directly to us on given contact details at our website.

For HFCL Limited
Executive President - Human Resources