

Kyndryl Modern Slavery Statement

Introduction

Kyndryl is a leading provider of mission-critical enterprise technology services offering advisory, implementation and managed-service capabilities to thousands of customers in more than 60 countries. As the world's largest IT infrastructure services provider, the Company designs, builds, manages, and modernizes the complex information systems that the world depends on every day.

Kyndryl provides enterprise technology services across cloud, applications, infrastructure, digital workplace, security and network domains. The Company delivers office-based and technology-enabled services and does not manufacture physical products.

This Modern Slavery Statement is prepared on behalf of Kyndryl Australia Pty Ltd ABN 98 646 647 592 (**Kyndryl Australia**) and Kyndryl UK Limited (**Kyndryl UK**), subsidiaries of Kyndryl Holdings, Inc., in accordance with the requirements set out in *Section 16 of the Modern Slavery Act 2018 (Cth) and the Modern Slavery Amendment (Australian Anti-Slavery Commissioner Act 2024) (Cth)*, and *UK Modern Slavery Act 2015 Section 54(1)*.

Kyndryl's Approach to this Modern Slavery Statement

Commitments to human rights and modern slavery are outlined in the Global Human Rights and Modern Slavery Policy (Policy), which applies to Kyndryl staff and suppliers. The Policy prohibits human rights abuses and addresses risks of forced labour, child labour, other forms of modern slavery, and complicity in supply chain abuses.

This Statement applies to all Kyndryl staff and suppliers, including Kyndryl UK Limited and Kyndryl Australia Pty Ltd, and aligns with the *UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) (as amended 2024)*.

This Statement was prepared jointly by Kyndryl's Procurement, Global Citizenship and Sustainability, Legal, and Human Resources teams across the United States, United Kingdom, and Australia.

The Policy is reviewed annually, and more frequently as required. Review involves Legal, Human Resources, Global Citizenship and Sustainability, and Procurement for continued compliance with the *UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) (as amended in 2024)*. Annual updates are approved by the SVP, Global Citizenship & Sustainability. Updates are approved by the SVP, Global Citizenship & Sustainability.

This Statement outlines actions taken during the reporting period from 1 April 2025 to 31 March 2026.

Country President Remarks

People are at the heart of everything we do. As a services company, Kyndryl has an opportunity to embed ethical corporate behavior and protection for human rights into every aspect of our business. Our human-rights and modern-slavery statements are essential foundations for us to achieve our goal for driving positive change at scale and reflect our values focused on creating a just and sustainable future for all.

We are committed to excellence in how we conduct our business, to maintaining constructive employee dialogue and labor relations worldwide and to complying with all applicable regulations protecting freedom of association and employee rights under the law to join associations and engage in consultation. These commitments are guided by globally recognized frameworks as outlined in our Policy.

This Modern Slavery Statement is published not only to address required regional regulations, but also to set a high standard for human rights in all countries where we operate. We are proud to publish a combined Modern Slavery Statement that reflects the global nature of our business and our global focus on human rights and modern slavery issues.

Modern Slavery Statement

Kyndryl's Policies on Human Rights and Modern Slavery

Governance of human rights and modern slavery is guided by our Policy. The Policy and global employment standards, in line with the Kyndryl Code of Conduct (Kyndryl Code), govern labour conditions, health and safety, community engagement, and child labour. We prohibit forced labour, bonded labour (including debt bondage), indentured or involuntary prison labour, and child labour, and comply with applicable laws relating to wages, working conditions, and employment standards.

Our approach aligns with international standards, including the International Bill of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines.

Kyndryl's global governance framework includes periodic review of human rights and modern slavery practices. Oversight is provided by the SVP of Global Citizenship and Sustainability, who reports to the Global Head of Corporate Affairs and chairs the Corporate Citizenship Executive Committee on a quarterly basis.

Our Supply Chain

Global Procurement manages the sourcing of goods, services and intellectual property required to support business operations. A global structure is used to select suppliers and execute contracts and purchase orders.

Approximately 700 sourcing professionals support procurement activities across categories including information technology services, consulting, administrative services, marketing and communications, software, infrastructure services (including network, edge, hardware and maintenance), telecommunications, and facilities and logistics.

Supply chain social responsibility activities are managed through dedicated resources responsible for the development and implementation of policies and processes to identify and address risks in the supply chain.

Global Procurement operates in coordination with the Corporate Citizenship and Sustainability team, with dedicated resources for monitoring and managing direct suppliers. Procurement operations are geographically based in our countries of operation.

Kyndryl is an affiliate member of the Responsible Business Alliance (**RBA**) and has adopted the RBA Code of Conduct (**RBA Code**) in operations and for use in supplier management.

Suppliers are provided equal opportunity to compete for business, regardless of characteristics protected by applicable law.

Modern Slavery Risks

For Kyndryl, human rights and modern slavery risk is primarily associated with the extended upstream supply chain. Risk management is supported through semi-annual Enterprise Risk Management assessments and alignment with the RBA Code.

We share the responsibility to help ensure every person in our supply chain is treated with respect and dignity, and for protecting workers and the communities in which we operate.

The RBA Code is applied to first-tier suppliers and defines compliance expectations related to applicable laws, human rights, and remediation of adverse impacts. We expect suppliers to establish and maintain social responsibility, comply with applicable regulations, respect human rights, and remedy human rights and modern slavery impacts.

Supplier expectations include labour standards addressing forced labour, child labour, working hours, wages and benefits, freedom of association, health and safety, environmental responsibility, and ethical conduct.

Modern Slavery Prevention and Due Diligence

RBA Code principles are implemented across operations through the Kyndryl Global Employment Standards and the Kyndryl Code. The Global Employment Standards address labour conditions, including freely chosen employment, young workers, wages, benefits and working hours. The Kyndryl Code applies to directors, executive officers and employees, who complete training and confirm compliance annually.

Supplier due diligence is aligned with the RBA Code. During new supplier onboarding, Kyndryl requires suppliers work toward and remain compliant with the RBA Code, as applicable to their industry.

Supplier commitments are formalized via either: (1) execution of an RBA Letter Agreement; (2) signing an ethics and integrity agreement letter; or (3) demonstration of a supplier code of conduct equivalent or exceeding RBA Code for the supplier industry. Procurement templates also require suppliers to review and agree to the Kyndryl Contractor Code of Conduct.

Kyndryl uses the RBA Risk Assessment Platform to identify and assess potentially high-risk suppliers and regions. The platform applies a risk-based methodology aligned with the RBA Code, covering labour, human rights, health and safety, environmental, and ethical factors.

Potentially high-risk regions and suppliers are tracked through the Platform along with RBA Code Supplier self-assessment questionnaires (**SAQs**). SAQs include but are not limited to, child labour, forced labour, working hours, wages and benefits, health and safety, and elements of human rights due diligence. RBA tools support Kyndryl's supplier due diligence framework and contribute to meeting expectations under *section 16(1)(c) of the Australian Modern Slavery Act 2018 (Cth)* and *section 54(5)(d) of the UK Modern Slavery Act 2015*. If a supplier violates commitments, Kyndryl can take corrective actions, including limiting or excluding such supplier from business opportunities.

Kyndryl reviews risk assessment resources provided by both the Australian Federal Attorney General's Department and the UK Government to ensure our approach addresses the unique needs of the countries in which we operate.

We collaborate with industry initiatives and external partners to enhance shared visibility of supply-chain risks.

Modern Slavery Effectiveness and Reporting

During the reporting period, Kyndryl performed semi-annual enterprise risk assessments including human rights and modern slavery. In 2025, the Kyndryl ERM assessment did not identify human rights, or modern slavery operational risks.

In fiscal year 2025, 95% of new suppliers signed a commitment letter, with the remaining 5% demonstrating compliance through an ethics and integrity letter or equivalent standards.

Kyndryl employees, customers, suppliers, and others with whom we engage can report any suspected unlawful or unethical conduct or potential violations of the Kyndryl Code or policies through [Kyndryl Reporting Channels](#) that include an online web portal and geography specific hotlines.

Modern Slavery Training

All Kyndryl employees and contractors have access to training modules supporting responsible supply chain practices. Modules are based on Kyndryl's corporate training framework, and include RBA Standards, Environmental Management, Health and Safety Management Systems, and Ethics and Responsible Business Practices. Training completion is tracked to help ensure global coverage, reinforce compliance, and strengthen Kyndryl responsible supply chain practices.

This statement was approved by the board of Kyndryl UK Limited.

Signed by:



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Jonathan Ingram

President, Kyndryl UK Limited

Date: 02-Jun-2026 | 10:59 AM CEST

In order to prepare this Modern Slavery Statement, Kyndryl Australia Pty Ltd ABN 98 646 647 592 as the reporting entity pursuant to the Modern Slavery Act 2018 (Cth), engaged and consulted with the entity Kyndryl Australia Client Services Pty Ltd ABN 35 139 232 885 covered by this statement, being an entity we own or control, with the ultimate holding company being our parent, Kyndryl Holdings, Inc. 655735292 incorporated in the United States.

This statement was approved by the board of Kyndryl Australia Pty Ltd ABN 98 646 647 592.

Signed by:



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Graeme Beardsell

Managing Director, Kyndryl Australia and New Zealand

Date: July 14, 2026 | 2:38 PM AEST