

Global Human Rights and Modern Slavery Policy

Introduction

Kyndryl is a leading provider of mission-critical enterprise technology services offering advisory, implementation and managed services 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. We have a long track record of helping enterprises navigate major technological changes, particularly by enabling our customers to focus on the core aspects of their businesses during these shifts while trusting us with their most critical systems. Our purpose is to design, build and manage secure and responsive private, public, and multi-cloud environments to serve our customers' needs and accelerate their digital transformations.

We offer services across domains such as cloud services, core enterprise and zCloud services, applications, data, and artificial intelligence (AI) services, digital workplace services, security and resiliency services and network and edge services as we continue to support our customers through technological change.

For more information, visit www.kyndryl.com.

Policy Scope

Our Human Rights and Modern Slavery Policy applies to all Kyndryl staff across our operations and suppliers. We also share our policies and best practices with our ecosystem of customers and partners.

Commitments

We are committed to ethical business practices respecting and protecting the civil, cultural, economic, political, individual, and social human rights of all people across our operations, offerings, services, relationships, and we share best practices with our ecosystem of customers, suppliers, partners, and employees.

Globally we do not tolerate human rights abuses and commit to avoiding business with entities involved in modern slavery and human trafficking. We seek to proactively avoid human rights abuses and complicity in abuses by participants in our supply chain, including forced labor and child labor, bonded (including debt bondage), indentured labor, involuntary prison labor, servitude, or human trafficking.

Kyndryl commits to maintaining constructive employee dialog and labor relations worldwide. We fully comply with all applicable regulations protecting freedom of association and ensuring employee

rights under the law to join associations. We ensure our employees have recourse to consultation and dialogue.

In several countries, we have representative bodies which facilitate dialogue and consultation between employee representatives and management at national and European level.

Guiding Principles

Our human rights commitments are informed by global standards, including the [International Bill of Human Rights](#) (consisting of the *Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights*, and the *International Covenant on Economic, Social and Cultural Rights*) and the [International Labor Organization's Declaration on Fundamental Principles and Rights at Work](#).

To focus on efforts material to our business and operations, our human rights actions are also guided by the [UN Guiding Principles on Business and Human Rights](#) (UNGPs) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#).

Policies Addressing Human Rights

Kyndryl has policies to govern our corporate behavior regarding labor, health and safety, community engagement, and child labor.

Our global employment standards and processes help us comply with all applicable laws regarding freely chosen employment, wages, benefits, working hours, harassment, respect and dignity, safe working environments, ethical dealings, privacy, and other elements of employment - in line with the [Kyndryl Code of Conduct](#).

Additional policies and approaches protecting the rights of our value chain include our [Responsible AI at Kyndryl](#) approach and our [Kyndryl Privacy Statement](#).

As a [Responsible Business Alliance affiliate signatory](#) member, we commit to requesting that suppliers certify compliance with laws regarding slavery and human trafficking, refrain from the direct or indirect use of forced labor or any forms of human trafficking, and verify/certify that their supply chains address these issues - in alignment with local laws and the [Responsible Business Alliance Code of Conduct \(RBA Code\)](#). We use the RBA Code to address social responsibility risks including supply chain, labor, health and safety, environment, and ethics issues.

Governance, Accountability and Risk Management

Our Human Rights and Modern Slavery Policy approach and management standards are global and help embed respect for human rights into our operations and supply chain. A cross-functional team including Human Resources, Procurement, and Legal, with support from external stakeholders, develops these policies. Kyndryl employees, suppliers, partners, and customers are expected to respect, uphold, and promote our human rights commitments.

Kyndryl's SVP of Global Citizenship and Sustainability oversees our human rights and modern slavery approach. This includes an annual review of Kyndryl's initiatives and monitoring evolving industry standards.

The SVP reports to Kyndryl's Global Head of Corporate Affairs, who serves as the chair of Kyndryl's Corporate Citizenship Executive Committee. This Committee includes the CEO, COO, CHRO, CFO, General Council, VP Legal, and Global Leader, Kinship @ Kyndryl. This Committee regularly reviews performance and progress, approves efforts, and makes recommendations as part of Kyndryl corporate citizenship governance.

Risk Identification

For Kyndryl, human rights and modern slavery risk reside in the extended upstream supply chain. We manage our risk mitigation efforts through the Enterprise Risk Management (ERM) program, and we perform risk assessments semi-annually that include human rights and modern slavery. In 2024, our ERM assessment did not identify human rights, or modern slavery impacts in our operations.

Areas of Impact

As an IT infrastructure services provider, Kyndryl's human rights and modern slavery management depend on our employees and suppliers who support our business. Our services affect the stakeholders and communities in which we operate.

We aim to identify potential risks in our operations and across our value chain. To help uphold our commitments, we acknowledge the following potential impact areas:

Our Operations and Employees: Our guiding principles, policies and standards addressing human rights and modern slavery issues are the keys to fostering a culture of respect and support that promotes positive relationships between employees and management.

To reinforce this, Kyndryl employees are required to complete the Kyndryl Code of Conduct program (training and certification) annually.

Our customers: We published our approach to [Responsible AI at Kyndryl](#) in 2024. Our approach includes transparency, detecting and reducing bias, privacy and confidentiality, safety, accountability, and training.

Our [Kyndryl Privacy Statement](#) outlines how we collect, use, and share information to help ensure our customers can control their data.

Our Suppliers: We share a responsibility with our suppliers to protect workers and the communities where they operate. We aim to ensure every person in our supply chain is treated with respect and dignity. We expect suppliers to comply with all employment laws, respect human rights and take measures to remedy adverse human rights and modern slavery impacts. This includes maintaining labor standards that address forced and child labor, hours, wages and benefits, freedom of association, health and safety, environmental responsibility, and ethical practices. We leverage [the RBA Code](#) to detail our expectations.

During supplier onboarding, Kyndryl requires our suppliers to work toward and remain compliant to the Responsible Business Alliance (RBA) Code of Conduct, as applicable to the supplier's industry. This commitment is formalized via either; (1) Supplier signing an RBA Letter Agreement, (2) Supplier signing an ethics and integrity agreement letter, or (3) Supplier

demonstrates they have a code of conduct that is equivalent to or exceeding the RBA Code, for elements applicable to the supplier's industry.

Due Diligence

RBA Code Audits and Self-Assessment Questionnaires from suppliers are tracked and monitored to help ensure compliance. We assess high-risk countries using the global RBA risk analysis tool. If a supplier violates supplier controls, Kyndryl can take corrective actions including limiting or excluding suppliers from business opportunities.

Reporting and Transparency

We are committed to reporting transparently and publicly on human rights and modern slavery, and we continue to assess our efforts to evolve our commitments.

Annual human rights and modern slavery updates are available in our [Corporate Citizenship Report](#), and as required on Kyndryl country-specific websites in [Australia](#), [Canada](#), [Norway](#), and the [United Kingdom](#).

How to Report Concerns

Kyndryl strives to act with the highest integrity standards and complying with all applicable laws and regulations. We rely on our employees, customers, suppliers, partners and others with whom we engage to report any suspected unlawful or unethical conduct and potential violations of the [Kyndryl Code of Conduct](#), this Human Rights and Modern Slavery Policy, and other Kyndryl policies or statements.

We encourage stakeholders to report concerns and provide a range of established channels for them to do so. All reports are confidential and may be anonymous where permitted by law. Kyndryl prohibits threats or acts of retaliation for reporting potential wrongdoing or inappropriate behavior in good faith or cooperating with an investigation.

Where warranted, reports are reviewed and investigated by the appropriate Kyndryl investigatory function, and disciplinary measures are taken as appropriate.

24/7 Reporting Mechanisms

- Online through our [Kyndryl Reporting Concerns Portal](#)
- Third-party, multi-lingual, country-specific free [hotline phone numbers](#)
- Cybersecurity issues/incidents should be reported to the [Cybersecurity Incident Response Team \(CSIRT\)](#)

Improvement and Progress

We commit to annually reviewing our approach to Human Rights and Modern Slavery at the executive committee level, assessing risks through our ERM process, and improving our operational efforts to reflect evolving best practices, industry norms and legal requirements.

Policy Availability

This policy is published externally on Kyndryl.com, on our [Non-financial ESG Disclosures Hub](#), and on internal communications channels available to all employees globally.

Policy Review / Update	Approver
July 25, 2025	 Faith Taylor, SVP of Global Citizenship and Sustainability