

# Modern Slavery Policy

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## 1. Policy Statement

At Expleo, we are dedicated to upholding the highest ethical standards in all aspects of our operations. This commitment extends to combating modern slavery and human trafficking in accordance with Indian, United States, United Kingdom, United Arab Emirates and Singapore laws and regulations. Modern slavery encompasses practices such as slavery, servitude, forced labour, and human trafficking, and we are resolute in ensuring that such practices have no place within our business or supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

As part of our commitment to ethical practices and corporate responsibility, Expleo strictly prohibits the use of forced, compulsory, or trafficked labour, and condemns any form of slavery or servitude within our operations and supply chains. We uphold these principles in compliance with national and international laws, including the Indian Penal Code and the Modern Slavery Act where applicable. We expect all suppliers and business partners to share our commitment to eradicating modern slavery and human trafficking. Expleo will ensure compliance with these standards and to identify any potential risks. We engage in dialogue with suppliers to promote awareness and provide necessary support for them to uphold these high standards throughout their own supply chains.

Our goal is to create a supply chain that respects human rights and dignity, reflecting our values as a responsible corporate citizen.". This policy extends to all individuals working

directly or indirectly for us, encompassing employees, directors, consultants, contractors, suppliers and business partners. This policy will be published in company website and does not form part of any employee’s contract of employment, and we may amend it at any time.

## 2. Responsibilities

### 2.1. Management:

- The management of Expleo is tasked with implementing and overseeing this policy concerning Ethics and compliance during Investigations, as well as Legal matters during litigation. They ensure that adequate resources and training are provided to prevent modern slavery and human trafficking.

### 2.2. Employees:

- All employees are required to understand and comply with this policy and report any concerns promptly.
- Non-compliance with this policy may result in disciplinary action, up to and including termination of employment.

### 2.3. Recruitment and Hiring

- Expleo Solutions Limited implements robust recruitment and hiring processes across India, the UK, the USA, the UAE, and Singapore to prevent modern slavery, human trafficking, and forced labour.
- Our comprehensive procedures include stringent checks on eligibility to work in the respective jurisdictions and ensure all employees are protected against exploitation.
- We ensure that most of our team members are employed full-time, with all colleagues having formal employment contracts and/or agreements that are regularly reviewed in accordance with local employment laws and best practices.
- Additionally, all employment agencies we engage are thoroughly vetted to uphold these standards.

## 3. Compliance with the Policy

Compliance with our Modern Slavery and Human Trafficking policies is a fundamental commitment at Expleo. We rigorously uphold these policies across all facets of our operations, ensuring that every individual associated with our organisation, including employees, suppliers, and business partners, adheres to these standards without

exception. Through ongoing monitoring, regular audits, and proactive engagement with stakeholders, we mitigate risks and maintain a zero-tolerance approach towards any form of forced labour, slavery, or human trafficking within our supply chains and broader business activities. By embedding these principles deeply into our corporate culture and practices, we strive to contribute positively to society and uphold the highest ethical standards in all our endeavours.

**3.1.** At Expleo, we adhere to all relevant **Indian** laws and regulations concerning modern slavery, including but not limited to:

- The Constitution of India prohibiting forced labour under Article 23.
- The Bonded Labour System (Abolition) Act, 1976.
- The Child Labour (Prohibition and Regulation) Amendment Act, 2016.

**3.2.** Modern Slavery in the **United States**:

Modern slavery in the United States is addressed through various laws and regulations aimed at combating human trafficking and forced labour.

- Trafficking Victims Protection Act (TVPA): First passed in 2000 and subsequently amended, this act is a cornerstone of U.S. efforts against human trafficking. It defines severe forms of trafficking, including sex trafficking and forced labour, and provides measures for victim protection, prosecution of traffickers, and prevention efforts.
- Thirteenth Amendment: While this amendment abolished slavery and involuntary servitude, it permits involuntary servitude as a punishment for crime. This has led to the use of compulsory prison labour, which is a controversial aspect of modern slavery in the U.S.
- Uyghur Forced Labour Prevention Act: Enacted in 2021, this law aims to prevent goods made with forced labour in the Xinjiang Uyghur Autonomous Region of China from entering the U.S. market.
- National Human Trafficking Hotline: The U.S. operates a hotline to report suspected human trafficking cases. In 2021, it received over 10,000 reports.
- Despite these measures, challenges remain, such as the lack of legislation criminalising forced marriage and setting a minimum age for marriage at 18 without exceptions.

**3.3.** In the **United Kingdom (“UK”)**, modern slavery is addressed through several key laws and mechanisms:

- **Modern Slavery Act 2015:** This is the primary legislation aimed at tackling modern slavery. It includes provisions for:
  - **Criminal Offences:** Establishing offences for slavery, servitude, forced or compulsory labour, and human trafficking.
  - **Penalties:** Imposing severe penalties, including life imprisonment for perpetrators.
  - **Protection for Victims:** Enhancing support and protection for victims, including the establishment of the National Referral Mechanism (NRM) to identify and support victims.
  - **Transparency in Supply Chains:** Section 54 of the Modern Slavery Act requires certain businesses to publish annual statements detailing the steps they have taken to ensure their operations and supply chains are free from modern slavery.
  - **Duty to Notify:** Specific public authorities are required to notify the Secretary of State if they suspect someone is a victim of modern slavery.
  - **Independent Child Trafficking Guardians:** These are appointed to support child victims of trafficking, ensuring they receive appropriate care and protection.
  - **Human Rights Act 1998:** Article 4 of the European Convention on Human Rights, incorporated into UK law by this act, prohibits slavery and forced labour.

The UK government also publishes annual reports and updates on their efforts to combat modern slavery, reflecting ongoing initiatives and progress.

**3.4.** In **Singapore**, modern slavery is addressed through several key laws and regulations:

- **Constitution of the Republic of Singapore:** Article 10 of the Constitution explicitly prohibits slavery and all forms of forced labour, with exceptions for compulsory service for national purposes and work incidental to serving a prison sentence.
- **Penal Code:**
  - **Section 370:** Prohibits buying or disposing of people as slaves.

- Section 371: Prohibits habitual dealing in slaves.
- Section 367: Prohibits kidnapping or abducting with the intent to subject a person to slavery.
- Prevention of Human Trafficking Act 2014: This act aims to deter and punish trafficking in persons, protect and assist trafficked persons, and make consequential amendments to related laws.

These laws form the backbone of Singapore’s efforts to combat modern slavery, ensuring strict penalties for offenders and protection for victims.

**3.5.** In the **United Arab Emirates** (“UAE”), modern slavery is addressed through several key laws and regulations:

- Constitution of the UAE: Article 34 of the 1971 Constitution explicitly prohibits slavery and forced labour.
- Penal Code:
  - Article 346: Criminalises the possession, buying, selling, offering for sale, or disposal of any person as a slave.
- Federal Law No. 51 of 2006 on Combating Human Trafficking: This law outlines severe penalties for human trafficking offences and provides measures for victim protection.
- Labour Law Reforms: Recent reforms prohibit employers from charging recruitment fees to migrant workers and allow workers to change jobs without needing their employer’s authorisation.
- Ewa’a Shelters: These shelters provide care, safe housing, and support services for victims of human trafficking and other forms of violence.
- Dubai Foundation for Women and Children (DFWAC): This organisation offers immediate protection and support services to victims of domestic violence, abuse, and human trafficking.

These laws and initiatives reflect the UAE’s commitment to combating modern slavery and protecting the rights of vulnerable individuals.

## 4. Communication and Awareness of Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. We require our suppliers to provide training

to their employees on their rights. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Expleo Solutions Limited, India, provides comprehensive training on modern slavery and human trafficking for all relevant employees. This training includes an overview of our Modern Slavery Policy, the identification of signs of modern slavery, and the procedures for reporting concerns. Training is conducted annually and is mandatory for all new hires within the first 30 days of their employment. Refresher courses are provided bi-annually to ensure that employees remain informed about best practices and any updates to the policy. Additional training is offered to those in managerial or procurement roles to enhance their understanding and management of risks associated with modern slavery in our operations and supply chain.

## 5. Reporting

Employees and stakeholders are encouraged to report any concerns related to modern slavery without fear of retaliation. Reports can be made through Expleo’s confidential reporting channels.

Speak Up portal: Our whistleblowing policy enables all our employees to raise concerns if they suspect any malpractice within our business, supply chain and/or how the colleagues are treated without fear of reprisals.

Speak Up web portal Link: <https://expleo.gan-compliance.com/p/SpeakUp>

## 6. Breach of the Policy

If the breach involves employees or contractors of Expleo, appropriate disciplinary measures will be taken in line with company policies and local employment laws. This may range from warnings and retraining to suspension or termination of employment or contract.

## 7. Risk of Modern Slavery practices in our Operations and Supply chain

Expleo is a Global Engineering, Technology and consulting service provider and its



activities involves low risk of modern Slavery (human trafficking, slavery, forced labour, servitude etc.). We have an exhaustive process to ensure the risks of Modern slavery in our Supply chain through Supplier code of conduct, Supplier risk assessment and contracting framework. Our internal processes are reviewed to ensure that our obligations under Modern slavery legislations are met.

### **Global Supply Chain**

Expleo Solutions Limited, India, is committed to upholding human rights and expects all third parties throughout our global supply chain to do the same. We encourage our third parties to adopt standards consistent with the principles established under the United Nations Declaration of Human Rights. In our Supplier Code of Conduct ([Expleo Supplier Code of Conduct 2022 website version.pdf](#)), we explicitly require that our third parties compensate their employees in accordance with all applicable laws and regulations, including Indian Labour Laws. We prohibit the employment of underage children, forced labour, and any form of physical punishment or abuse. Third parties must take proactive measures to ensure that slavery and human trafficking are not occurring within their own operations or within the operations of any organisations they engage with.

### **Third Party Screening and Monitoring**

Expleo Solutions Limited, India, conducts thorough screening and due diligence on third parties at the time of onboarding and during contract renewals. This process includes checks for human trafficking and modern slavery alerts and red flags. Our Global Third-Party Engagement process involves verifying that third parties are not involved in activities such as people trafficking, human rights violations, drug trafficking, illegal prostitution or its promotion, kidnapping, abduction, or any form of sexual offences or abuse. We continuously monitor and review third parties to ensure ongoing compliance with our anti-slavery and human trafficking standards.

## **8. Monitoring and Review**

This policy is reviewed annually to ensure its effectiveness and relevance. We monitor our adherence to this policy and make improvements as necessary.

## 9. Communication

This policy is communicated to all employees, suppliers, and stakeholders. It is available on Expleo's website ([Expleo | Legal Documentation](#)) and is provided to new employees during their induction.

## 10. Conclusion

Expleo is committed to preventing modern slavery and human trafficking. By adhering to this policy and collaborating with our stakeholders, we aim to uphold the highest standards of ethics and integrity in our operations.

## 11. Confidentiality and Proprietary Rights Notice

Expleo owns the proprietary rights to this document, which is publicly available. It contains confidential information that should only be used with permission. Without Expleo's prior written consent, it may not be duplicated, reprinted, loaned, stored in data retrieval systems, or disclosed to outside parties.

### Template Version History

Ver sion No	Date	Author	Reviewer	Approver	Change Description
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3.0	28-Aug-2024	Lal Krishna	Ramya Venkatesan, Sachin Dhavale	Roopa Rajesh	Applicability to affiliates.