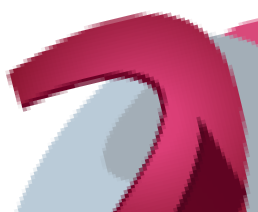


MODERN SLAVERY POLICY

Version 1.2



Document History

Document Version	Date	Author	Reviewed by	Approved by	Remarks
0.1	30 th October 2017	Consultant	Director		Draft
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1. PURPOSE OF THE STATEMENT

Modern Slavery covers harassment through forced and compulsory labour and human trafficking in the supply chains of businesses. This Statement made pursuant to Section 54 (1) of the UK Modern Slavery Act 2015, reaffirms our commitment to uphold human rights and sets out the steps we have undertaken to ensure that slavery and human trafficking do not operate within our business or our supply chain.

2. OUR ORGANISATION

PearlArc is a ISO 9001:2015 and 27001:2013 certified company providing leading-edge IT services, outsourcing and business solutions to organizations worldwide enhancing business certainty, competitive advantage and innovation.

We offer end-to-end innovative and leading-edge solutions to help corporations leverage technologies, outperform their competition and acquire sustainable growth. We have proven capabilities in new and emerging technologies and extensive experience across a broad range of industries and domains which enable us to deliver world-class, secure, scalable and reliable business systems.

As a responsible business we take pride in being a good Corporate Citizen by integrating Corporate Social Responsibility (CSR) in our thoughts and actions. We understand that our business has direct and indirect effects on society and an ethical synergy is needed to survive along. We have extended our commitment from the clients to the society and from our daily project works to successful community relations for a collective betterment.

Towards this goal, we have several programs designed to embrace sustainable social development and to make CSR a way of life at PearlArc through:

- Social Investments
- Employee Engagements

<http://www.pearlarc.com/about/citizenship>

3. OUR SUPPLY CHAIN

PearlArc is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

PearlArc uses a wide range of suppliers who supply goods for sale, provide services at events and support our operations.

We have classified our suppliers into two major categories:

- Supplier of Services: This covers our partners who provide essential services (such as catering, transportation, construction, security etc.) on our campuses.
- Supplier of Products: This covers our partners who supply products (such as IT hardware, software, electrical / electronic equipment, furniture, heavy equipment, stationery etc.) to us.

4. POLICIES

PearlArc has several policies which aim to minimise the risk of modern slavery in our supply chain.

- **Vendor Management Procedure** which sets out internal requirements for buying goods and services, the decision to outsource certain functions, the selection of a service provider, and the supervision of that service provider including risk assessment.
<https://pearlarcssystemslimited.sharepoint.com/iso/Shared%20Documents/5.%20Procedure/2019/Vendor%20Management%20Procedure.pdf>
- **Anti-Bribery and Corruption Policy** provides guidance and policies to prevention, deterrence and detection of fraud, bribery and all other corrupt business practices to which all PearlArc employees must adhere. This policy is designed to help employees to identify when something is prohibited so that bribery and corruption is avoided and provides help and guidance.
<http://www.pearlarc.com/policies/anti-bribery-and-corruption-policy-v1.0.pdf>
- **Equal opportunity Policy** sets out the company's position on equal opportunity in all aspects of employment, including recruitment, promotion and provides guidance and encouragement to employees at all levels to act fairly and prevent discrimination on the grounds of sex, race, marital status, disability as defined by the Disability Discrimination Act 1995, part-time and fixed term contract status, age, sexual orientation or religion.
<http://www.pearlarc.com/policies/equal-opportunity-policy-v1.0.pdf>
- **Prevention of Harassment Policy** The purpose of this policy is to ensure that employees are treated with dignity and respect, and to enable an environment that is free from harassment and bullying.
<http://www.pearlarc.com/policies/prevention-of-harassment-policy-v1.1.pdf>

As part of our responsible supply chain efforts, we undertake the following:

- During onboarding, our suppliers are required to sign the Supplier Code of Conduct. Additionally, our top suppliers are required to acknowledge the Supplier Code of Conduct.
- We insist, in our agreements, that our suppliers comply with local laws. In addition, we have updated our standard contractual terms to include obligations on our suppliers to comply with our position regarding anti-slavery and human trafficking. We build long-standing relationships with local suppliers and make clear our expectations of business behaviour.
- We will also strive to ensure that slavery and human trafficking is not taking place within any of our supply chain business partners and will not tolerate such activities either within the supply chain or within any part of PearlArc's business.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers.

5. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators to help us sustain our efforts and measure the effectiveness of the steps

- Undertaken to remove modern slavery and human trafficking from our supply chains
- Working with our suppliers to acknowledge and socialize the Supplier Code of Conduct
- Providing information to support staff on our campuses in India on their rights, including relating to sexual harassment.
- Periodic audits by our internal audit team along with remedial action
- Reviewing issues raised through our grievance redressal mechanisms and initiating corrective action

6. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we training to relevant members of our supply chain and their benefits. We also require our suppliers of people to provide training to their employees on their rights, including relating to wages, benefits and grievance redressal forums.

7. LOOKING AHEAD

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

8. APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of PearlArc System Private Limited for the year 2019-19

This statement has been formally approved by the Directors of PearlArc System Private Limited.

A handwritten signature in black ink, appearing to read "Ravisha T C".

Ravisha T C

Founder & Director
PearlArc Systems Private, Ltd.

9. REFERENCE

- ISO 27001:2013 - A.8.3.3 Physical Media Transfer
- ISO 27001:2013 - A.7.2.1 Management Responsibilities