

# Elait Anti-Slavery Policy

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### Version Control

Author	Version	Date	Details
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### Related documents

Title	Author

### Distribution List

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# 1 Introduction

## 1.1 Document Purpose

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Elait Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

## 1.2 Intended Audience

This document is intended for all employees and direct-contractors of Elait and its subsidiaries. It is assumed that associates who go through this document understand the contents in their entirety. Failure to understand will not be considered as defence, in case of non-adherence to policies and guidelines stated herein.

## 1.3 Conventions/Abbreviations

In this document, the conventions and abbreviations are as follow:

Term	Description
Offshore	Elait IT Technology Services Pvt Ltd, based in India
HR / HRD	Human Resources Department
Admin	Administration Department
Offshore	Any of the company locations in India
Onshore	Elait, UK

## 2 Commitments

### Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded labour, child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

### Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- Consistent with our approach, we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

### Training and Monitoring

Sensitising our employees to this policy is part of induction training for all new employees. In addition, this will be repeated annually for all employees.