

AASEYA IT SERVICES PRIVATE LIMITED AND ASSOCIATED SUBSIDIARY GROUP COMPANIES

Modern Slavery Act Statement

Version 1.0

Introduction & Organizational Structure

This statement sets out the steps that we, Aaseya IT Services Private Limited, and all of our wholly owned subsidiary companies will take to ensure that slavery and Human trafficking is not taking place in any part of our supply chain or any part of our business.

Founded in and headquartered in Indore, India in 2017, Aaseya is a leading global technology solutions and services provider. Our services are present in many countries across the world.

Our UK business – Aaseya Software Services Limited - has employees working from our central London office, as well as employees based on client sites across varying locations within the UK. The labour supplied to us in pursuance of our operations has a global reach.

The UK business is a wholly owned subsidiary of Aaseya IT Services Private Limited company based in India, whose ultimate parent company is Yash Technologies Inc situated in Illinois, USA.

The company is comprised of a Board of Directors:

1. Pankaj Jain, CEO
2. Manoj Baheti, Director
3. Dharmendra Jain, Director

Definitions

We consider that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

We acknowledge our responsibilities in relation to tackling modern slavery and commit to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to its labour force and, additionally, our supply chains.

We do not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to us in the pursuance of the provision of our services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to our responsibilities under

relevant employment legislation in the United Kingdom and seek to enhance these through our internal policies and procedures where practicable.

Supply Chains

We are committed to treating everyone in our business and supply chain with the dignity and respect they deserve. We procure many different commodities from a variety of suppliers. The supply chains of the Organisation relate mainly to IT consulting and staff augmentation services globally within its affiliate companies.

Throughout our supply chains, we are committed to high ethical standards, promoting safe and fair working conditions. We believe we have a responsibility and opportunity to encourage sustainable business practices as well as inclusion and diversity amongst our suppliers.

Potential Exposure

In general, we consider our exposure to slavery and human trafficking to be relatively limited, given our place within the IT supply chain. Nonetheless, we have taken steps through the Group Code of Conduct to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to us.

We encourage staff to report violations of, or activity inconsistent with our policies and procedures through our Whistleblower policy.

Steps

We carry out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our organisation or supply chains, including conducting a review of the controls of our suppliers.

We have not, to our knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, we have taken the following steps to ensure that modern slavery is not taking place:

1. Implementation of regulatory provisions and guidelines and include the same in internal policies
2. Review and revision of our policies and code of conducts
3. Internal audit of our processes, and human resource due diligence to identify risk and potential exposure
4. Supplier audit and due diligence to avoid outbreak of slavery and human trafficking
5. Periodical review and assessment by senior management to ensure zero tolerance on slavery and human trafficking
6. Training and workshops to employees to raise awareness of modern slavery and human trafficking.
7. Supplier adherence to our values

Key Performance Indicators

We have set the following key performance indicators to measure our effectiveness in ensuring modern slavery is not taking place in our Organisation or our supply chains:

- Completion of audits by external provider
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations

- During on boarding, our suppliers are required to sign 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 Aaseya business.

Policies

We have the following policies which further define our stance on modern slavery:

The Aaseya Code of Conduct (“Code”) which is the foundation of our Compliance and Integrity Programme, sets forth our core values, shared responsibilities, global commitments and promises. The Code expresses Aaseya’s commitment to conducting business ethically. Our values are the ethical backbone of the Code. The Code is supplemented by additional policies such as the Anti-Sexual-Harassment policy and Business ethics and code of conduct. Our Whistle-blower Policy provides our stakeholders with a safe process to raise concerns without fear of retaliation. Similarly, our Supplier Code of Conduct describes the expectations that we have of our suppliers, including on forced labour, discrimination-free workplace, wages and benefits, ethical dealings

Slavery Compliance Officer

We have a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to our obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.