

## **Modern Slavery Policy, Prolifics, Inc.**

This statement is issued in accordance with section s.54 of the Modern Slavery Act 2015, outlining the measures undertaken by Prolifics Inc. to prevent modern slavery, also referred to as human trafficking, in its business operations and supply chain.

Prolifics Inc. operates as an IT reseller and consulting firm, with an office in London, and serving clients across the UK. Additionally, it has business operations in Germany, the US, Canada, and India. Satya Bolli is the Chairman and Managing Director of the company. Prolifics maintains relationships with a limited number of suppliers, the include Value Added Distributors, third-party consultants, and its office supplier (WeWork).

### **1. Organization Structure and Supply Chains**

Prolifics acknowledges its responsibility to combat modern slavery and human trafficking within its operations and supply chains. We recognize that modern slavery can take various forms, including forced labour, child labour, debt bondage, and human trafficking, and we are committed to preventing, detecting, and mitigating these risks.

Our organization's structure incorporates clear lines of responsibility and accountability for modern slavery and human trafficking issues. Senior management is responsible for overseeing the implementation of this policy and ensuring compliance with relevant laws and regulations.

We also recognize the complexity of modern supply chains and acknowledge the importance of understanding and managing risks throughout our supply chain. We commit to promoting ethical practices among our suppliers and expect them to comply with applicable laws and regulations related to modern slavery and human trafficking.

### **2. Policies in Relation to Slavery and Human Trafficking**

Our organization maintains clear policies prohibiting all forms of modern slavery and human trafficking. These policies apply to all employees, contractors, suppliers, and business partners. Key elements of our policies include:

- Prohibition of forced labor, child labor, and human trafficking in all our operations and supply chains.
- Commitment to conducting business in an ethical and transparent manner.
- Requirement for suppliers and business partners to adhere to the same standards regarding modern slavery and human trafficking.
- Provision of mechanisms for reporting any concerns or suspicions regarding modern slavery or human trafficking.

### **3. Due Diligence Processes**

We conduct due diligence processes to identify and assess potential risks of modern slavery and human trafficking within our operations and supply chains. This includes:

- Assessing the risk profile of suppliers and business partners based on factors such as geographic location, industry sector, and nature of operations.
- Engaging with suppliers and business partners to understand their policies and practices related to modern slavery and human trafficking.
- Incorporating contractual clauses requiring suppliers and business partners to comply with our standards on modern slavery and human trafficking.

Considering the high value nature associated with Prolifics Inc.'s operations, the risk of non-compliance with the Modern Slavery Act is deemed low. However, the Directors acknowledge the importance of remaining vigilant and avoiding complacency. As an example, one potential area of concern is the supply chain; for instance, third-party cleaners are engaged to maintain cleanliness at the London office. To address this, measures have been implemented to verify compliance with the Modern Slavery Act by liaising with WeWork, the landlord.

We have internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

- Recruitment policy: We operate a robust recruitment policy, which involves verifying the eligibility of all employees to work in the UK. This measure serves to prevent instances of human trafficking or coerced labor.
- Whistleblowing policy: We maintain a whistleblowing policy to encourage employees to voice concerns regarding the treatment of colleagues or practices within our business and supply chain. This policy assures employees that they can report issues without fear of retaliation.
- Code of business conduct: Our organization abides by a code of business conduct defining expected behavior for both employees and suppliers, fostering an environment of accountability and ethical practices.

#### **4. Risk Assessment and Management**

Our organization conducts regular risk assessments to identify, evaluate, and mitigate risks of modern slavery and human trafficking. This includes:

- Assessing the likelihood and potential impact of modern slavery and human trafficking risks within our operations and supply chains.
- Implementing controls and measures to mitigate identified risks, such as supplier audits, site inspections, and employee training programs.
- Monitoring and reviewing the effectiveness of risk mitigation measures on an ongoing basis.

#### **5. Key Performance Indicators (KPIs) to Measure Effectiveness**

We establish KPIs to measure the effectiveness of our efforts to stop modern slavery and human trafficking. These KPIs may include:

- Number of reported instances or suspicions of modern slavery or human trafficking within our operations and supply chains.
- Percentage of suppliers and business partners assessed for compliance with our standards on modern slavery and human trafficking.
- Level of awareness and understanding of modern slavery and human trafficking among employees through training programs and engagement initiatives.
- Prolifics maintains a limited pool of suppliers and conducts selective (ad hoc) due diligence, which involves online searches, to verify that these organizations have not been convicted of offenses related to modern slavery.
- If considered necessary, Prolifics may require the supplier to confirm the following:
  - They have implemented measures to eliminate modern slavery within their own business.
  - They hold their suppliers accountable for addressing modern slavery issues.
  - They ensure that their UK-based employees are paid at least the national minimum wage.

- They adhere to prevailing minimum wage regulations for employees located outside of the UK, in accordance with the respective country's laws.

#### **6. Training on Modern Slavery and Trafficking**

We provide training and awareness programs to employees to increase understanding of modern slavery and human trafficking issues. Training includes:

- Define what modern slavery is
- Describe what the UK Modern Slavery Act (2015) covers
- Identify who is affected by modern slavery
- Recognize the signs of someone who may be a victim of modern slavery
- Determine what you should do if you spot the signs
- Recall safety tips to avoid becoming a victim of modern slavery

#### **To conclude, it's important to note Prolifics' core values:**

**Thought Leadership and Innovation** – by investing in our talented people, customer solutions and excellence in execution, we drive thought leadership in the industry as well as innovative solutions for our clients.

**Customer Centric** - We appreciate our customers, and we are focused on providing them the best solutions, every day. We continuously listen to our customers, assess their needs, and adjust accordingly to meet and exceed their expectations.

**Accountability** - We are a company that encourages open communication between our people and their managers, as well as our customers. We hold each other accountable, accept responsibility for our mistakes and make appropriate improvements.

**Trust and Teamwork** - Focused on company unity, we promote trust, team collaboration and mutual respect with our fellow employees.

**Ethical Behavior and Integrity** - We do the right thing every time. Every action that we take is taken with honesty, sincerity, and integrity.

This statement has been approved on behalf of Prolifics, Inc. (UK).

Frank Mulligan, UK General Manager

Date: 1 April 2024