

Modern Slavery Policy

Kiya.ai

This Statement on Modern Slavery is applicable to Infrasoft Technologies Limited and its subsidiary companies (herein referred as Kiya.ai) across the world.

Kiya.ai is a global organisation providing IT services, solutions, and outsourcing to clients worldwide.

This policy ensures that modern slavery and human trafficking are not taking place in any part of our supply chains or any part of our business. References to modern slavery and human trafficking are based on the definitions set out in applicable regulations such as the UK Modern Slavery Act 2015, the Australia Modern Slavery Act, 2018 and guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO), particularly relating to forced or compulsory labour.

As an organisation, we respect all our stakeholders' human rights and dignity. We do not employ children at any of our workplaces and do not use forced labour in any form. We do not confiscate the personal documents of our employees or force them to make any payment to us or anyone else in order to secure employment with us or to work with us. With respect to our supply chain, we only seek to work with suppliers and service providers who can demonstrate that they share similar values to our own, and we expect them to adopt ethical standards comparable to our own at all times.

Preventing Slavery and Human Trafficking in Our Business

1. Slavery, child labour, and human trafficking are serious crimes and violations of fundamental human rights. At Kiya.ai, we conduct our business fairly, ethically, and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour, and human trafficking, both in our business and in our supply chains. We do not tolerate it.
2. Kiya.ai provides every employee with a written contract of employment. We pay every employee in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees, including in relation to working hours, rest breaks, and holidays. We do not withhold any identity documents for employees.
3. Kiya.ai is committed to being an Equal Opportunity Company and does not charge directly or indirectly, in cash or kind, any type of fees or charges for recruitment or placement from any employee or potential candidates. We ensure this is followed by all our recruitment agencies, consultants, volunteers, suppliers, or service providers.
4. Kiya.ai is committed to the areas of Human Rights, Labour, Environment, and Anti-Corruption. Our policies are endorsed by senior management and specify expectations from associates, suppliers, and business partners.
5. Failure to comply with our compliance policies may result in disciplinary action, including termination of the contract between the associate and / or Company. It could also involve other legal steps being taken against the offending party.
6. To identify compliance risks, Kiya.ai makes appropriate checks in line with applicable laws on all employees, business associates, recruitment agencies, directors, officers, consultants, volunteers, suppliers, or service providers.

7. We seek relationships with suppliers who share a common commitment to ethical and lawful behaviour.
8. Kiya.ai undertakes due diligence when appointing new suppliers and regularly reviews existing suppliers. In addition, risk assessment and periodic monitoring are done for high-risk suppliers, and Kiya.ai reserves the right to audit any supplier as required.
9. We continuously track regulatory changes in this regard to ensure that our policies and processes incorporate the required compliance obligations and we stay compliant. In addition, compliance monitoring and internal audits ensure Kiya.ai's compliance.

Kiya.ai Supply Chain and Standards for Suppliers

1. Our supply chain includes suppliers of IT-related Products and Services (e.g., hardware, software, IT services), other products and services (e.g., stationery, canteen services, security services, transportation, infrastructure etc.) and people (e.g., contractors, business associates etc.).
2. All Suppliers must abide by the Kiya.ai Supplier Code of Conduct. It clearly articulates that the supplier shall not employ children and shall not use forced or slave labour of any type. It is communicated to all Suppliers through purchase orders and contracts.
3. When supplying goods or services, our suppliers must assess their business and supply chains and confirm that they comply with their legal obligations in relation to Modern Slavery and are committed to ensuring there is no slavery, forced labour or servitude, child labour, or human trafficking taking place in their business, or any of their supply chains.
4. If they do not comply with the Supplier Code of Conduct, or are found to have slavery or human trafficking in their business, or knowingly in their supply chain, Kiya.ai may terminate the contract with immediate effect and pursue legal remedies against the supplier concerned.
5. All suppliers are given details of whom to report ethical concerns to within our company through the Supplier Code of Conduct. All such concerns would be investigated as applicable.

Kiya.ai Standards for Associates and Others Providing Services

All our policies and this statement are published on an internal portal and our associates are informed that they can familiarise themselves with the same. This is also available on the Kiya.ai website for all others providing services in any capacity, including as director, officer, consultant, volunteer, supplier, or service provider, or in any other capacity not already mentioned.

All of our associates are expected to act with compliance and integrity in accordance with the standards of behaviour set out in the policy. Each associate provides a signed deed of acceptance to this upon joining the organisation. Related compulsory training is administered as part of the employee induction process. Training on geography specific

Labour Laws is provided to the associates, as required. Associates are encouraged to continuously review and familiarise themselves with the company policies on conduct, ethics, and whistleblowing. They must immediately report any suspicions of Modern Slavery or human trafficking in our business or supply chains by writing to Ethics Committee. The committee will investigate and report to the Management and, if required to the Board of Directors, within a reasonable time, on actions that may be required to be taken.

They will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith. This applies even if, after investigation, they are found to be mistaken. If an associate believes that he/she has suffered such treatment on doing so, then the associate should immediately refer to our Whistleblower Policy, if required.