

## Contents

<b>1. Policy Statement.....</b>	<b>2</b>
<b>2. Applicability.....</b>	<b>2</b>
<b>3. Responsibility for the policy .....</b>	<b>2</b>
<b>4. Compliance with the policy .....</b>	<b>3</b>
<b>5. Communication and awareness of this policy .....</b>	<b>4</b>
<b>6. Breaches of this policy .....</b>	<b>4</b>

## 1. Policy Statement

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

## 2. Applicability

This policy applies to all persons across all locations working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form any part of any employee's contract of employment and the Company may amend it at any time.

## 3. Responsibility for the policy

Head of Legal and Compliance Officer has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Function Heads will have the primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery.

Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Officer at [legal@happiestminds.com](mailto:legal@happiestminds.com)

#### **4. Compliance with the policy**

Our due diligence processes include supplier audits, risk assessments, and continuous monitoring to ensure compliance with this policy.

We ensure all members have read, understand, and complying with this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

We ensure that members involved in procurement activity are aware of and follow modern slavery and ethical employment practices. Members are required to avoid any activity that might lead to, or suggest, a breach of this policy. All are educated to notify their line manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Preventing, detecting, and reporting modern slavery is integral to our business and supply chain. This responsibility falls on everyone who works for us or operates under our control. It is essential that you refrain from any activities that could lead to, or imply, a violation of this policy.

Members are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business, or supply chains of any supplier tier, at the earliest possible stage. If any member believe or suspect a breach of this policy has occurred, or that it may occur, they must report it in accordance with our Whistle-Blower Policy as soon as possible, which is available on our website at <https://www.happiestminds.com/investors/policy-documents/>.

We adopt a Zero-tolerance to any such violation, and we aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring that no one suffers any detrimental treatment because of reporting, in good faith, their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.

If any member believe that they have suffered any such treatment, they can inform the compliance manager immediately. If the matter is not remedied, and as a member of Happiest Minds, they should raise it formally using our Grievance Procedure, which is available from the Company.

## **5. Communication and awareness of this policy**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **6. Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf, if they breach this policy.