

## Girikon

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# MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

## **Document Version Control**

## **Document Controller**

Date	Document Released By	Version	Change Reference
II <sup>th</sup> April, 2018	Mr. Sanatan Dey, Operations Manager	1.1	First release, document has been created
24 <sup>th</sup> Feb, 2019	Mr. Sanatan Dey, Operations Manager	1.2	Second release, no changes required
15th Jan, 2020	Mr. Sanatan Dey, Operations Manager	1.3	Third release, no changes required
18th Jan, 2021	Mr. Sanatan Dey, Operations Manager	1.4	Fourth release, no changes required
28 <sup>th</sup> March, 2022	Mr. Sanatan Dey, Operations Manager	1.5	Fifth release, no changes required
20th April, 2023	Mr. Sanatan Dey, Operations Manager	1.6	Sixth release, no changes required.
I 0 <sup>th</sup> April, 2024	Mr. Sanatan Dey, Operations Manager	1.7	Seventh release, no changes required.

## Reviewers

Name	Position	Role
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Mr. Ravi Verma	Assistant Manager	IT Infrastructure
Mr. Shailendra Jha	Administration Manager	Physical & Environment security & Security in supplier delivered services
Mr. Yoginder Singh	Business Development Manager	Information Security in Customer Relationship
Mr. Awanish Shukla	Technical Architect	Project Management
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Mr. Sanatan Dey	Operations Manager	Incident Management & Business Continuity& Compliances

Mr. Ashok Anibha	CEO	ISMS Policy, Risk management, Security organization & Compliances

## Approver(s)

Name	Position	Organization
Mr. Ashok Anibha	CEO	Girikon

## **Authorized Users**

No	Authorized users	Location
1	All employees	India & US

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#### Abbreviations/Definition

MR-ISMS: Management Representative- Information Security Management System

ERT: Emergency Response Team

PA: Public Address

#### Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At GIRIKON, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2020.

#### Our business and supply chains

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

#### Policies:

GIRIKON operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct our code encourages employees to do the right thing by clearly stating the
  actions and behavior expected of them when representing the business. We strive to maintain
  the highest standards of employee conduct and ethical behavior when operating abroad and
  managing our supply chain.
- Purchasing Code we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

#### Supplier due diligence

GIRIKON conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Ensure the local employment regulations are followed for all employees and suppliers including e-Verify and Background checks.
- Sanctioning suppliers that fail to improve their performance in line with our requirements
- We require all suppliers to attest that:
  - They don't use any form of forced, compulsory or slave labour
  - Their employees work voluntarily and are entitled to leave work
  - They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
  - They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
  - They don't require employees to surrender their passports or work permits as a condition of employment

#### **Awareness**

GIRIKON has raised awareness of modern slavery issues by putting up posters across our facilities that is focused on regulations related to lawful employment and whistleblowing policies around any unlawful employment.

This statement covers 5<sup>th</sup> April 2021 to 30<sup>th</sup> April 2022 and has been approved by the board of Girikon at the board meeting on April 5<sup>th</sup> 2021.