



MODERN SLAVERY & HUMAN TRAFFICKING POLICY

“EOS Power India Private Limited” is a Global Electronics Manufacturing Services Company headquartered in SEEPZ SEZ, Mumbai, INDIA. Our vision to earn the respect of our stakeholders continues to inspire our endeavors. As a responsible corporate and business responsibility, we believe that success includes embracing actions across all three dimensions of sustainable performance viz., environmental, social and economic.

This Statement is made by “EOS Power India Private Limited”, pursuant to various sections of International Law and mainly Section 54 (1) of the UK Modern Slavery Act 2015, and Section 3 of the Australia Modern Slavery Act, 2018 for the year ending 31 December 2020.

Further, the IPC (Indian Penal Code, 1860) is the official criminal code of India. The IPC, under Chapter XVI, deals with offences against the human body. The Code was subsequently amended in 2013 to include provisions dealing with slavery, compulsory labour and sexual exploitation.

1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“modern slavery”), all of which include the deprivation of a person's liberty by another in order to exploit them for any personal or commercial gain whatsoever in nature.

1.2 EOS Power India Private Limited is committed to uphold human rights and adequate steps have been undertaken to ensure that slavery and human trafficking do not operate within our business and supply chain internally in the company and by our suppliers.

1.3 This policy applies to all category as under;

(a) Individuals working in and for the Company, or on our behalf, in any capacity, including employees at all levels, Directors, Officers, Agency Workers, Contract Workers, Contract Personnel, Volunteers, Interns and agents

and

(b) To our Manpower Suppliers, Labor Contractors, Transporters, External Consultants, External Agencies, Third-party representatives, business partners (“Suppliers”) etc.

1.4 The Company is committed to:

(a) Acting ethically and with an integrity in all our Business dealings and relationships;

(b) Implementing & enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and

(c) Ensuring there is a total transparency in the approach to tackling modern slavery in our business and in our supply chains consistent with our disclosure obligations under the Modern Slavery Act 2015.



- 1.5 We expect the same high standards from all of our Suppliers.
- 1.6 As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

2. IDENTIFYING POTENTIAL MODERN SLAVERY & HUMAN TRAFFICKING

2.1 Modern Slavery may be observed in:

- a) Or business, for example our housekeeping & cleaning workforce;
- b) our supply chains;
- c) All our Outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards.

2.2 We expect our employees to ensure they work in alignment with applicable policies, laws and also our values. We also expect our employees to comply with all the applicable regulations and legislation relating to working hours, wages, welfare, human rights etc. All our employees are expected to work in accordance with our ethos and approach with regards to health, safety, environmental and people development objectives. Our employees have been advised to report the slavery and human trafficking cases (if any found) to the Human Resource Department team.

2.3 All the Company's Suppliers and its Subcontractors, third party agencies involved in supply chain directly or indirectly, shall follow Modern Slavery Act 2015 and refrain themselves against any offences whatsoever nature which breach the Modern Slavery Act, 2015.

The Supplier shall inform company's Purchase team via email or through any other valid communication in case they find that any such offences have been observed.

In case of breach of the Modern Slavery Act 2015, the company reserves its right to terminate the relationship with the Supplier without any notice or intimation by cancelling the Purchase Order or mandate any suitable action including legal.

2.4.1 There is no typical victim of modern slavery and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking:

- a) The person is not in possession of their own passport, identification or travel documents.
- b) The person is acting as though they are being instructed or coached by someone else.
- c) The person allows others to speak for them when spoken to directly.
- d) The person is dropped off and collected from work.
- e) The person is introverted or appears frightened.
- f) The person does not seem to be able to contact friends or family freely as he was doing earlier.
- g) The person has limited social interaction or contact with people outside their immediate environment.

The above list is not exhaustive and can be added. A person may also display a number of the indicators set out above but they may not necessarily be a victim of slavery or trafficking.



3. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

- 3.1 The Management has overall responsibility for ensuring this policy complies with the Company's Legal and Ethical Obligations.
- 3.2 The Purchase & Human Resources Team in the company is responsible for implementation of this policy and to deal and resolve with any queries about it.
- 3.3 All categories of Personnel and Staff members must comply with this policy.
- 3.4 All Suppliers must comply with this policy.

4. REPORTING MODERN SLAVERY

- 4.1 All the Company's employees and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:
 - a) If you are an employee of Company, your Line Manager; or your immediate superior.
 - b) If you are a Supplier, your primary accounts manager / buyer or business contact with the Company.

5. PUBLICATION OF THIS POLICY

- 5.1 This policy of Modern Slavery is incorporated in the HR Manual and is available on Company's Intranet for its employees.
- 5.2 This policy is available to all the Suppliers on the Company's website.

6. BREACHES OF THIS POLICY

- 6.1 Any of the company employee or personnel, who breaches this policy shall face disciplinary action and which could also result in dismissal for misconduct or gross misconduct.
- 6.2 The relevant employee of the Company may terminate its relationship with a Supplier if it is in breach with this policy.

Alternatively, the relevant employee of the Company may re-consider to work based on the complexity of the issue with the Supplier to resolve such issues.

7. POLICY REVIEW

- 7.1 Purchase and Human Resources team is responsible for reviewing this policy whenever deemed fit and as necessary at periodic intervals to ensure that it meets the company's legal and ethical requirements and reflects its best practice.
- 7.2 This policy does not form part of any contract of employment and may be amended at any-time.



Mr. Vijay Gujarathi
Managing Director

