

Human Trafficking Policy

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1. PURPOSE

Human Trafficking "**Policy**" is consistent with Kalyani Technoforge Limited ("**KTFL**") core values to protect and advance human dignity and human rights in our global business practices.

KTFL believes in a working environment which is free from Human Trafficking (as defined below), and to ensure the same KTFL has adopted zero tolerance to Human Trafficking or slavery in any part of our global organization.

KTFL employees, contractors, subcontractors, vendors, suppliers, partners and others through whom KTFL conducts business must take appropriate steps to mitigate the risk of Human Trafficking and slavery in any part of its program/ projects.

2. SCOPE

This Policy applies to all personnel employed by or engaged to provide services to KTFL, including, but not limited to, KTFL's employees.

Every KTFL employee is responsible for reading, understanding and complying with this Policy. This Policy is available on HR portal where it can be accessed by all personnel at any time.

All Managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. If you have any questions or concerns relating to this Policy, consult KTFL HR. If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading "Policy Compliance" below.

3. POLICY

KTFL prohibits Human Trafficking in persons. KTFL employees, contractors, subcontractors, vendors, suppliers, partners and others through whom KTFL conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Procuring Commercial Sex Acts (as defined below) that may be directly associated with KTFL, which includes during work hours, while attending off-site functions, and any time in work travel status;
- Using Forced Labour (as defined below) in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions or not adhering to the code of conduct;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;

- Charging applicants/candidates recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

KTFL is committed to verify, evaluate, promote awareness about, and address risks associated with Forced Labor and Human Trafficking.

4. COMPLIANCE

Report any conduct that you believe to be a violation of this Policy, directly to Business HR Leaders. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law.

KTFL will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

5. KEY DEFINITIONS

- **Commercial sex act:** Any sex act on account of which anything of value is given to or received by any person
- **Forced labor:** Situations in which persons are coerced to work through the use of violence or intimidation or by more subtle means, such as accumulated debt, retention of identity papers, or threats of denunciation to immigration authorities.
- **Human trafficking:** Human trafficking means recruiting, harboring, transporting, providing, or obtaining a person for labor or services through the use of force, fraud, coercion, abduction, deception, the abuse of power or of a position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Exploitation includes involuntary servitude, peonage, debt bondage or slavery, the removal of organs, and sex trafficking or other forms of exploitation.