

Prepared By: HR	Sarita Handa Exports Pvt. Ltd.	Version- SHE 02/04
Date: April 2026	Review: Yearly	Approved By: Mgmts.

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

INTRODUCTION:

Traffic in human beings and beggar and other similar forms of forced labour are prohibited, and any contravention of this provision shall be an offence punishable in accordance with law. **Sarita Handa Exports Pvt. Ltd. (SHE)** is committed to conduct its business in an ethical and responsible manner, including by carrying out our own business activities in a way that respects and supports the protection of human rights.

Definition:

Define Human Trafficking to recruitment, transport, harbouring, transfer, receipt of a person for exploitation. These means are the use of threat, force, abduction, fraud, deception, abuse of power or through inducement. Exploitation includes physical or sexual exploitation, slavery, or forced removal of organs.

SCOPE:

SHE's anti - slavery and Human trafficking policy applicable for all the officers and employees working with Sarita Handa Exports and it is also applicable for all current units and future establishments.

OBJECTIVE:

A focus on tackling slavery and Human trafficking protects vulnerable workers and helps prevent and remedy severe human rights violations.

It can also bring business benefits too, including:

- Protecting and enhancing our reputation and brand.
- Greater staff retention and loyalty based on values and respect.
- Acting in a transparent, responsible and accountable manner.

Policy:

Sarita Handa Exports Pvt Ltd. strictly prohibits employees, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it

transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labour from a person by threats of serious harm to that person or another person, among others.

“Article 23 of the Indian Constitution addresses the prohibition of trafficking in human beings and forced labour. Article 23 prohibits trafficking in human beings, including trafficking for the purpose of forced labour, slavery, or exploitation. It recognizes the inherent dignity and rights of individuals, ensuring protection against such practices. It also prohibits forced labour or any form of compulsory labour. It ensures that no person can be compelled to work against their will or under exploitative conditions.”

“Criminal Law (amendment) Act 2013 has come into force wherein Section 370 of the Indian Penal Code has been substituted with Section 370 and 370A IPC which provide for comprehensive measures to counter the menace of human trafficking including trafficking of children for exploitation in any form including physical exploitation or any form of sexual exploitation, slavery, servitude, or the forced removal of organs.”

Modern slavery/Human trafficking is a crime and a violation of fundamental human rights in different parts of the world. SHE discourages activities that lead to Modern slavery and adopts a Zero Tolerance approach towards the same.

Sarita Handa Exports Pvt Ltd. also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

Form of Human trafficking:

- Slavery, servitude (coercing someone to provide services) and forced or compulsory labour (including instances of unlawful deductions of wages and working extended periods of time without breaks).
- Human trafficking (arranging or facilitating the travel of a victim with a view to them being exploited).
- Committing any offense with the intention to commit human trafficking.
- Aiding, abetting, counselling, or procuring any of these offences.
- Destroying or otherwise denying access to an employee's identity or immigration documents.
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment.
- Using recruiters that do not comply with local labour laws.
- Charging employees recruitment fees.

- Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a SHEPL Company contract.
- Providing housing that fails to meet host company standards.
- Failing to provide an employment contract or work document where required by law.

Sarita Handa Exports Pvt. Ltd. company will take appropriate disciplinary action for violations of these rules, up to and including discharge of employees, subcontractors, and agents.

Sarita Handa Exports Pvt Ltd. Company will cooperate fully with the Government agency or other appropriate governmental authorities in audits or investigations relating to such violations.

Employees of Sarita Handa Exports Pvt Ltd. Company are required to cooperate in any internal or external investigation of suspected wrongdoing under this policy.

Mandatory Reporting Requirements

Employees having knowledge of credible information concerning actual or potential violations of this policy must report them immediately in accordance with the Sarita Handa Exports Pvt Ltd. Escalation Procedure. Timeliness of reporting any suspected violation is critical, as the Government agency will imposed an especially stringent reporting obligation when there is credible information of violations. Failure to report actual or potential illegal behaviour or actual or potential violations of this policy may also subject employees to disciplinary action, up to and including termination of employment.

Sarita Handa Exports Pvt. Ltd. has many channels available to receive reports of possible violations of policy.

However, given the immediacy of our notification requirements to the Government agencies, possible violations of this policy should be reported directly to the Corporate Internal Audit, in accordance with the Sarita Handa Exports Pvt. Ltd.

Escalation Procedure:

Employees may also report possible violations to line management, human resources, compliance professionals throughout the organization, the General Counsel and members of the Sarita Handa Exports Pvt Ltd. legal department concurrent to reporting to Corporate Internal Audit.

Any person who receives reports of possible violations under this policy must notify Corporate Internal Audit immediately. When making a report, employees are encouraged to share as much information as possible so that appropriate action can be taken.

In addition to the reporting requirements described above, it is possible for Sarita Handa Exports Pvt Ltd. employees to report activity inconsistent with this policy to a third party managed hotline. Such reporting does not satisfy an employee's obligation to report to Sarita Handa Exports Pvt Ltd. credible information concerning actual or potential violations of this policy immediately, in accordance with the Sarita Handa Exports Pvt Ltd.

Escalation Procedure Non-Retaliation Policy

Sarita Handa Exports Pvt Ltd companies do not tolerate retaliation or threats of retaliation against anyone who raises a concern under this policy or who assists with an internal or governmental audit or investigation. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, which could include termination of employment.

We are working to embed these standards into all our core business activities, including training, communications, and contract and due diligence processes, as appropriate

Implementation and Training:

This policy is publicly available throughout the Company and clearly communicated to all employees in a way it can be understood through induction programs, policy manuals and intranet portals. The workers are informed of these rights by the various training activities at each unit.

Review and feedback:

This policy will be reviewed annually.

Policy Version 2.04

Formulated by

Mr. Bijender Kumar
Manager (Compliance)

Approved by

Mr. Rajeev Kumar
GM- P & A