

## SLAVERY & BRIBERY & ANTI-CORRUPTION POLICY

This statement is made pursuant to Section 54 of the Modern Slavery Act, 2015 (the "Act") and this statement sets out the steps that WHARTON SUSTAINABLE SOLUTIONS has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain in compliance with the Act.

### Our Business:

WHARTON SUSTAINABLE SOLUTIONS, having its registered office at Om Tower, 7th Floor 32 Chowringhee road, Kolkata-700071, India is a leading contact centre company. It offers a range of services for optimizing the customer experience and helping its clients to become more competitive. Wharton sustainable solutions provides a full suite of Training & Certification, Inspection Services, Consultancy. Wharton sustainable solutions currently has around 4 employees in the India working from Kolkata

### Adherence to Wharton sustainable solutions Values

Modern slavery is a serious global issue that encompasses slavery, servitude, human trafficking and forced labour. Wharton sustainable solutions has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These Include:

#### 1. Anti-bribery and Corruption Policy:

This policy sets out the organisation's stance on bribery and corruption explains how employees can identify any instances of this, how to report such instances and who to go to for guidance.

#### 2. Recruitment Policy:

We operate a robust recruitment process, including conducting eligibility to work in India & Abroad checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

#### 3. Public Disclosure Policy:

We operate a public disclosure policy (whistleblowing) so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

#### 4. Code of Business Conduct:

This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Our Suppliers :

As part of our initiative to identify and mitigate risk, we conduct due diligence on all suppliers before engaging or working with them, whilst also ensuring that the work undertaken is proportionate to the services to be provided and risk involved. We secure confirmation from our suppliers regarding full compliance with all elements mentioned under Section 54 of the Act. Our anti-slavery policy forms part of

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our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Our suppliers confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- They pay their employees as per the laws applicable within their country of operations; and
- We may terminate the contract at any time should any instances of modern slavery come to light.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant employees.

### Our effectiveness combating slavery / human trafficking

We review our modern slavery statement and associated policy on an annual basis and ensure that sufficient steps are taken to prevent slavery or human trafficking in our supply chains. Further, Wharton sustainable solutions ensures any of those associated with Wharton sustainable solutions, including its employees, supply chain and contractors, shall adhere and comply with Wharton sustainable solutions values.

**Signature:**



**Date:** 02/04/2023

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