CONTEVOLVE PRIVATE LIMITED

ANTI-SLAVERY AND CHILD LABOUR POLICY

Prohibition of forced labour, bonded labour, human trafficking and child labour across our operations and supply chain

Classification: Public

Document Control	
Version	1.0
Approved by	Board of Directors
Effective from	5 November 2026
Policy owner	HR Department
Review cycle	At least once every year, and on any change in law

1. Policy Statement

Contevolve Private Limited (the "Company") has zero tolerance for modern slavery and child labour in any form. We are committed to respecting human rights, to acting ethically and with integrity in all our business relationships, and to implementing effective systems and controls to ensure that slavery, servitude, forced or compulsory labour, bonded labour, human trafficking and child labour do not take place anywhere in our own business or in our supply chains.

This Policy reflects the fundamental rights guaranteed under Articles 23 and 24 of the Constitution of India, which prohibit trafficking in human beings and forced labour, and the employment of children in factories, mines and other hazardous employment.

2. Scope

This Policy applies to:

- all directors, officers, employees (permanent, fixed-term or temporary), interns, trainees and apprentices of the Company, wherever located (together, "Personnel"); and
- all contractors, sub-contractors, consultants, staffing and recruitment agencies, vendors, suppliers, service providers, channel partners and other third parties who do business with or on behalf of the Company (together, "Business Partners").

Business Partners are expected to adopt equivalent standards and to apply them to their own supply chains.

3. Legal and Regulatory Framework

The Company will comply with all applicable laws, including in particular:

- the **Child and Adolescent Labour (Prohibition and Regulation) Act, 1986** (as amended in 2016) and the rules made under it;
- the **Bonded Labour System (Abolition) Act, 1976**;

- the **Bharatiya Nyaya Sanhita, 2023**, including Section 143 (trafficking of persons) and Section 146 (unlawful compulsory labour), and the **Immoral Traffic (Prevention) Act, 1956**;
- the **Juvenile Justice (Care and Protection of Children) Act, 2015**, including Section 79 (exploitation of a child employee);
- the four Labour Codes in force from 21 November 2025 – the **Code on Wages, 2019**, the **Industrial Relations Code, 2020**, the **Code on Social Security, 2020** and the **Occupational Safety, Health and Working Conditions Code, 2020** – and applicable State laws; and
- where relevant to our business or our customers, foreign legislation such as the **UK Modern Slavery Act 2015** and the **Australian Modern Slavery Act 2018**.

The Company is also guided by the International Labour Organization (ILO) Conventions on Forced Labour (C29 and C105), Minimum Age (C138) and Worst Forms of Child Labour (C182), the UN Guiding Principles on Business and Human Rights, and the National Guidelines on Responsible Business Conduct. Where this Policy sets a higher standard than the law, the higher standard applies.

4. Key Definitions

- **Modern slavery** is an umbrella term that includes slavery, servitude, forced or compulsory labour, bonded labour, debt bondage and human trafficking.
- **Forced or compulsory labour** means any work or service extracted from a person under threat of penalty, or which the person has not offered voluntarily – including through the use of violence, intimidation, retention of identity documents, withholding of wages or debt manipulation.
- **Bonded labour** means labour provided by a person in return for an advance, loan or other economic consideration, as described in the Bonded Labour System (Abolition) Act, 1976.
- **Human trafficking** means recruiting, transporting, transferring, harbouring or receiving a person by threat, force, coercion, deception, abuse of power or inducement, for the purpose of exploitation.
- **Child** means a person who has not completed 14 years of age, and **adolescent** means a person who has completed 14 but not 18 years of age, as defined in the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986.

5. Our Commitments

5.1 Child labour

- The Company will not employ, engage or permit any child to work in any capacity.
- As a matter of Company policy, the minimum age for employment with the Company, including internships and apprenticeships, is **18 years**, unless the Board specifically approves otherwise for a lawful educational or training programme that does not interfere with schooling and is not hazardous.
- No adolescent will be engaged in any hazardous occupation or process, at night, or in any work that is likely to harm their health, safety, education or development.

5.2 Forced labour, bonded labour and trafficking

The Company will ensure that all employment is freely chosen and that:

- Personnel are free to resign by giving notice as per their terms of employment and are never held through threats, penalties or debt;
- no original identity documents, passports, certificates or other personal documents are retained by the Company or its agents (copies may be kept for verification);

- no recruitment fees or related costs are charged to workers, whether directly or through agencies; any such fees found to have been paid will be reimbursed;
- no bonded labour, advances or loans are used to tie a worker to employment;
- there are no unreasonable restrictions on the freedom of movement of workers; and
- no person is subjected to physical, sexual or verbal abuse, harassment or intimidation.

5.3 Fair working conditions

- Every worker will receive a written appointment letter or contract, in a language they understand, setting out wages, working hours, leave and other key terms.
- Wages will be no less than the applicable minimum wage, paid directly, in full and on time.

6. Recruitment and Age Verification

Before onboarding, the Company will verify the age and identity of every new employee using reliable documentary evidence (such as a birth certificate, school certificate, Aadhaar, PAN or passport) and keep a record of the check. Where recruitment agencies or manpower contractors are used, the Company will engage only reputable agencies that are licensed or registered as required by law, that confirm in writing that they comply with this Policy, and that charge no fees to candidates.

7. Supply Chain and Business Partners

The Company will take a risk-based approach to preventing modern slavery and child labour in its supply chain. In particular, the Company will:

(i) communicate this Policy (or an equivalent Supplier Code of Conduct) to all Business Partners at the start of the relationship;

(ii) include in contracts with Business Partners clauses that require compliance with this Policy and applicable laws, permit the Company to request information and conduct audits, require prompt notification of any suspected breach, and allow the Company to terminate the contract for serious breach;

(iii) carry out proportionate due diligence before engaging Business Partners, with enhanced checks for higher-risk categories such as manpower supply, housekeeping, security, facility management, construction, logistics, hardware and merchandise procurement;

(iv) ask higher-risk Business Partners to provide an annual written self-declaration of compliance and evidence of age verification, wage payment and statutory registrations; and

(v) where a breach is identified, work with the Business Partner on a time-bound corrective action plan, and terminate the relationship if the Business Partner fails or refuses to remedy the breach

8. Roles and Responsibilities

Who	Responsibility
Board of Directors	Overall responsibility for this Policy; approves the Policy and reviews compliance at least annually.
Compliance Officer	Designated by the Board to implement and monitor the Policy, receive and investigate concerns, maintain records and report to the Board.

Who	Responsibility
Human Resources	Age and identity verification, fair employment terms, training of Personnel and oversight of recruitment agencies.
Procurement / Administration	Due diligence on Business Partners, contractual clauses, supplier declarations and follow-up on corrective actions.
Managers	Ensure their teams and the Business Partners they manage understand and follow this Policy.
All Personnel	Read, understand and comply with this Policy and report any concern promptly.

9. Training and Awareness

This Policy will form part of induction for all new Personnel. Personnel in HR, procurement, administration and facility management will receive periodic training on recognising the indicators of modern slavery and child labour and on the steps to take if they have a concern.

10. Reporting Concerns

Anyone – including Personnel, Business Partners, their workers and members of the public – who suspects a breach of this Policy should report it as soon as possible to:

- **Compliance Officer:** Name: Arpita Sharma; Email: arpita.sharma@contevolve.com

All reports will be treated confidentially and investigated promptly and fairly. The Company will not tolerate any retaliation, victimisation or detriment against anyone who raises a concern in good faith, even if it turns out to be mistaken. Any person who retaliates will face disciplinary action. Where a person is in immediate danger, the matter should also be reported to the police (112) or, in the case of a child, to the Child Helpline (1098).

11. Response and Remediation

If child labour, forced labour or trafficking is identified in our operations or supply chain, the Company will act promptly and in the best interests of the affected person, including by:

- immediately removing the child or affected person from the work, and ensuring their safety and wellbeing;
- informing the relevant authorities where required by law, and co-operating fully with any investigation;
- in the case of a child, working with the family, the Business Partner and appropriate authorities or organisations to support the child's return to education and rehabilitation, without exposing the child to further harm;
- in the case of bonded or forced labour, ensuring the person is released, that any unlawfully withheld wages, fees or documents are returned, and that they are supported to access rehabilitation under applicable schemes; and
- reviewing the root cause and strengthening controls to prevent recurrence.

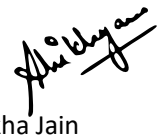
12. Consequences of Breach

Any breach of this Policy by Personnel will be treated as serious misconduct and may result in disciplinary action, up to and including dismissal. Any breach by a Business Partner may result in suspension or termination of the business relationship. The Company will refer matters to law enforcement authorities where appropriate. Many of the practices prohibited by this Policy are also criminal offences under Indian law, punishable with imprisonment and fines.

13. Monitoring, Records and Review

The Compliance Officer will maintain records of age verification, supplier due diligence, declarations, training, concerns raised and actions taken, and will report to the Board at least once a year. The Board will review this Policy annually, or earlier if there is a change in law or in the Company's operations. Where the Company is required, or chooses, to publish a modern slavery statement, it will be approved by the Board and published on the Company's website alongside this Policy.

For and on behalf of the Board of Directors



Shikha Jain

Director

Contevolve Private Limited



Mukta Jindal

Director

Contevolve Private Limited

Place: Noida
Date: 5 November 2026