

# **Anti Modern Slavery and Human Trafficking Policy**

## **INTRODUCTION**

PDS Limited and its subsidiary, affiliates, joint ventures and group companies (henceforth jointly referred to as “PDS”) are committed to protecting Human Rights and prohibiting all acts of human trafficking, slavery, servitude, forced marriage, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, and child labour throughout the organization, its business and supply chain. PDS herein elucidates its initiatives to mitigate/eradicate modern slavery and human trafficking from its business and supply chain.

## **OVERVIEW**

### **Organization Structure**

PDS headquartered in Mumbai, India, is a leading provider of integrated and customised solutions to global retailers and brands. It serves customers/clients across 22 countries, most predominantly in India, Hong Kong, UAE, Bangladesh, Sri Lanka, China, Germany, the United States, the United Kingdom etc.

PDS is listed on the National Stock Exchange and Bombay Stock Exchange in India (BSE:538730, NSE: PDSL). With a blend of extensive industry experience and a discerning design sense, PDS address the swiftly changing preferences and demands of global fashion businesses. PDS approach is guided by the principles of the right product, the right market, and the right factory, ensuring that PDS deliver high-quality and ethically produced goods. Collaboration lies at the core of PDS's business philosophy as PDS works alongside its partners and the environment to foster sustainable growth. While embracing technology, innovation, opportunity, and globalisation, PDS remain steadfast in its commitment to preserving the world PDS inhabit.

A company recognized globally for its comprehensive portfolio of services, a strong commitment to sustainability and good corporate citizenship. PDS has dedicated employees across 22 countries serving its vast clientele.

### **Supply Chain Overview**

PDS's supply chain is innately linked to its successful growth and works end-to-end to incorporate specific industry experience as well as a cross-industry perspective to help seed continuous innovation. Through advanced recycling techniques, reimagined supply chains, and innovative business models, PDS's vision extends beyond its own operations. PDS aspire to collaborate with partners, suppliers, and stakeholders who share our commitment to sustainability and circularity. Furthermore, PDS being a Member of the United Nations Global Compact, PDS is committed to its 10 principles as to how PDS conduct business both internally with its colleagues and externally with its supply chain partners.

## **RISKS OF MODERN SLAVERY**

PDS follows a risk-based assessment of its complex operation and supply chain. PDS understands that the population, location, industry/sector, type of products/services and categories of investments involved influence the level of such risk. PDS is committed to a continuous improvement approach that effectively responds to modern slavery risks. PDS has a well-defined criteria to identify high risk vendors, which include the industry its vendors operate in, labour intensity, financial stability, their audit records etc.

## **POLICIES**

PDS's internal policies (Code of Conduct, Supplier Code of Conduct, Human Rights Policy, Vigil Mechanism Policy, Equal Opportunity Policy) and practices focus on anti-slavery and anti-human trafficking and are part of a larger effort to ensure transparency, accountability and safeguarding of Human Rights extended to its supply chain. These internal policies specify PDS's commitment to upholding Human Rights, prohibiting slavery, servitude, forced labour, child labour and human

trafficking and are available on PDS website at [www.pdsltd.com](http://www.pdsltd.com). PDS expects all those who work with and for it including without limitation, its personnel, supply chain and contractors, to read and comply with its policy and practices.

PDS's Code of Conduct applies to all employees of PDS. It specifically identifies and prohibits several forms of modern slavery. These include any act of human trafficking, slavery, servitude and forced or compulsory labour.

The Code of Conduct also highlights and disavows the practice of child labour throughout its business and its supply chain. Beyond its own prohibition of child labour, PDS is committed to work in a proactive manner to eradicate child labour by directly and actively contributing to best practices, including only legitimate workplace apprenticeships, internships and other similar programmes that comply with all laws and regulations.

### **Supplier Code of Conduct**

PDS's Supplier Code of Conduct specifically requires suppliers to ensure that their employees are hired on their own free will and that they must prohibit forced, bonded, or any other form of compulsory labour such as slavery or trafficking, transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services in all of their operations. As part of PDS's Supplier Code of Conduct, Suppliers and their agents are required not to confiscate any identity or immigration documents, such as government-issued identification cards, passports or work permits, unless required by law.

If suppliers do not comply with the Supplier Code of Conduct, or are found to be non-compliant with anti-slavery or anti-human trafficking practices in their business, or knowingly in their supply chain, PDS retains the right to terminate the contract for services with immediate effect, including future blacklisting of the supplier concerned taking into account the extent of non-compliance and pursue legal remedies against the supplier concerned.

PDS also endeavors to foster an environment of open and honest communication. Suppliers are encouraged to raise concerns with respect to any suspected violations of this Code or any other specific concern arising out of their business relationship with PDS or its officers or employees to [whistleblower@psltd.com](mailto:whistleblower@psltd.com).

### **DUE DILIGENCE AND REMEDIATION PROCESSES AGAINST MODERN SLAVERY AND HUMAN TRACKING**

As part of its due diligence initiative to identify any modern slavery, PDS –

- a. conducts assessments through internal and third party tools and reviews the reports internally prior to the on boarding of any vendor/partner.
- b. conducts background verification of potential employees in compliance with the local laws of the relevant country.
- c. retains the right to conduct independent unannounced audits of its on-boarded vendors/partners to ensure compliance with PDS's Supplier Code of Conduct.

As part of its initiative to eliminate and further prevent modern slavery, PDS –

- a. requires its vendors/partners to provide a declaration of compliance with its Supplier Code of Conduct.
- b. employs internal processes to ensure PDS's employees and extended workforce are aware of and abide by PDS's Code of Conduct.
- c. updated its standard procurement contracts to include anti-slavery and anti-human trafficking provisions.
- d. operates in licensed premises strategically limited in geographical scope to ensure optimum control and supervision of the work environment.
- e. strives to build long-standing relationships with local suppliers and customers to effectively communicate its business standards.

## **APPLICABILITY**

This Policy applies to all persons working for PDS on its behalf in any capacity, including employees at all levels, directors, associates, business partners, suppliers, stakeholders and external consultants.

## **RESPONSIBILITY**

The Group ESG Director has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it and has primary and day-to-day responsibility for implementing this Policy. PDS monitor its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.

Line Managers are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **COMMUNICATION AND AWARENESS OF THIS POLICY**

Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for PDS, and regular training will be provided as necessary. Equally, this Policy is communicated to all PDS's suppliers, contractors and business partners at the start of a business relationship or renewal of a contract.

PDS's zero-tolerance approach to modern slavery and human trafficking must be communicated to all suppliers, contractors and business partners at the outset of PDS's business relationship with them and reinforced as appropriate thereafter.

## **BREACH OF THIS POLICY**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. PDS may terminate ITS relationship with other individuals and organisations working on its behalf if they breach this Policy.

## **REDRESSAL MECHANISM**

PDS encourages all employees to promptly report any concerns or issues related to modern slavery within its supply chain. Such concerns can be communicated either directly to their immediate supervisor or by writing to the designated vigilance officer at [whistleblower@pdsLtd.com](mailto:whistleblower@pdsLtd.com). Alternatively, employees may choose to report anonymously through the Navex hotline platform, accessible at <https://pdsLtd.com/ethics-hotline/>.

## **REVIEW OF THIS POLICY**

This Policy is reviewed and, if required, updated on an annual basis.