

Anti Modern Slavery and Human Trafficking Policy

Objective :

PDS Limited and its subsidiaries, affiliates, joint ventures, and group companies (hereinafter collectively referred to as “PDS”) are committed to protecting human rights and prohibiting all forms of modern slavery and human trafficking. This includes slavery, servitude, forced or compulsory labour, bonded labour, child labour, deceptive recruitment, debt bondage, forced marriage, and exploitation.

This Policy outlines PDS’s initiatives and commitments to prevent, detect, and eliminate any form of modern slavery and human trafficking within its operations and across its supply chains.

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.

Scope & 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.

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.

Definitions/Key Terms:

- a. Company - Company means “PDS Limited”.
- b. Board of Directors – The term “Board of Directors” or “Board”, shall have the same meaning as prescribed under the Companies Act, 2013 and rules made thereunder as amended from time to time and shall in relation to a company, means the collective body of the Directors of the Company.
- c. Policy – Policy means the current Anti Modern Slavery and Human Trafficking Policy, including amendments, if any from time to time.
- d. Human Trafficking- The recruitment, transportation, transfer, harbouring, or receipt of persons, by means of threat, coercion, abduction, fraud, deception, abuse of power, or exploitation, for the purpose of forced labour or sexual exploitation.
- e. Modern Slavery - Umbrella term that includes slavery, servitude, bonded labour, forced labour, child labour, human trafficking, and other practices that deprive a person of their liberty for the purpose of exploitation.
- f. Child Labour – Employment of individuals below the minimum legal working age as defined by applicable local laws and international conventions (ILO Conventions 138 & 182).

Background:

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.

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 . 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.

Roles & Responsibilities:

- Group ESG Director – Overall responsibility for compliance with this Policy, implementation, monitoring, and effectiveness.
- Line Managers – Ensure team awareness, compliance, and training.
- Employees & Suppliers – Complete induction and ongoing training on this Policy and report concerns promptly.

PDS adopts a zero-tolerance approach and communicates this to all suppliers, contractors, and partners at the outset of business relationships and during renewals.

Procedures/Implementation:

Supplier Code of Conduct

Suppliers must:

- Ensure employees are engaged voluntarily, free from forced or bonded labour.
- Prohibit human trafficking, slavery, or coercive practices.
- Refrain from confiscating identity or immigration documents, except where legally required.

Non-compliance may result in immediate contract termination, blacklisting, and legal action. Concerns can be reported confidentially to whistleblower@pdsLtd.com.

Due Diligence & Remediation

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.

Compliance & Consequences:

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 organizations 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. Alternatively, employees may choose to report anonymously through the Navex hotline platform, accessible at <https://pdsLtd.com/ethics-hotline/>

Related Documents:

- Code of Conduct
- Supplier Code of Conduct
- Human Rights Policy
- Equal Opportunity & Diversity Policy
- Whistleblower / Vigil Mechanism Policy
- Occupational Health & Safety Policy
- ESG & Sustainability Policy

Ownership and Review:

- Ownership – Human Resources & Compliance Team in consultation with the Group ESG Director.

- Review – This policy will be reviewed as and when required basis the business requirements or due to any changes in laws, regulations, or best practices.

Version History:

Version No.	Approved on	Created by	Approved by
1	October 29, 2025	Business & Compliance Team	Board of Directors

