



ANTI SLAVERY AND HUMAN TRAFFICKING

Chandigarh , India

Anti-slavery and human trafficking

1. Introduction

This policy is applicable to all individuals working for or on behalf of Sark Group in any capacity, including employees, partners, officers, agency workers, contractors, consultants, and any other third-party representatives. Sark Group expects all those who currently have or seek to establish a business relationship to familiarize themselves with this policy and to conduct themselves in a manner consistent with the company's values. The company will engage in business only with organizations that fully comply with this policy or are taking verifiable steps toward compliance.

2. About the Policy

Sark Group is committed to ensuring that the organization and its supply chain remain free from modern slavery or human trafficking in any form, particularly within the injection molding industry. These practices are part of a broader effort to guarantee transparency, accountability, and the protection of human rights throughout its supply chain. Sark Group expects all individuals working with or for it, including personnel, supply chain partners, and contractors, to read and adhere to this policy.

3. Responsibility for this Policy

Management holds overall responsibility for this policy and ensuring Sark Group complies with all its legal and ethical obligations. The HR head have the primary day-to-day responsibility for implementing this policy, monitoring its use, and ensuring that appropriate processes and control systems are in place and adjusted as necessary for effective operation.

4. What do we mean by Slavery?

Slavery can take many forms; it is a complex and multi-faceted problem, including:

- Slavery: where ownership is exercised over an individual
- Servitude: involving the obligation to provide service imposed by coercion
- Forced and compulsory labor: all work or service not voluntarily performed, obtained from an individual under the threat of force or penalty
- Human trafficking: involves arranging or facilitating another person's travel with the intent to exploit them

- Child labor: illegal employment of children that is exploitative or likely to be hazardous to a child's education, health (including mental health), physical well-being, or social development.
 - a. Sark Group will conduct risk assessments to identify the parts of the business and supply chains most at risk of slavery, focusing efforts on those areas.
 - b. Where appropriate, Sark Group will directly engage with new suppliers regarding the Anti-Slavery Policy to understand the measures they have in place to prevent slavery within their own businesses.
 - c. Contractual documentation will include specific prohibitions against slavery, servitude, the use of forced, compulsory or trafficked labor, and child labor, in line with this policy. All forms of slavery violate an individual's fundamental human rights by depriving them of liberty for commercial or personal gain.

5. How Sark Group seeks to Embed the Anti-Slavery Policy in Practice?

To support the commitments outlined in this policy, Sark Group aims to implement the following measures:

- Provision for contracted suppliers to hold their own suppliers to the same standards.
- The right to terminate any contractual arrangement in the event of a policy breach.

6. Communication and Employee Awareness Training

Managers will ensure that relevant colleagues receive adequate training on this policy and any supporting processes applicable to their roles.

7. Due Diligence Processes against Slavery

As part of its initiative to identify and eliminate slavery, Sark Group:

- Builds long-standing relationships with local suppliers and customers to effectively communicate its business standards.
- Implements whistleblowing and grievance redressal systems to encourage reporting of concerns and/or violations.
- Conducts independent assessments through third-party tools, reviewing reports internally prior to onboarding any vendor/partner whenever necessary.

8. Breaches of this Policy

A breach of this policy by an employee, Partners, or officer of Sark Group may lead to disciplinary action in accordance with the company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and result in immediate dismissal. All colleagues are expected to cooperate fully in any investigation into suspected breaches.

9. Display & Communication of Policy

- The Policy shall be displayed to all employees through the website of Sark Group.
- Any changes in the Policy shall be notified through the intranet portal by way of an updated Policy document.
- Policy Awareness shall be conducted regularly through various discussion/communication forums.

10. Periodic Review and Evaluation

Sark Group's management will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy, and effectiveness. The company reserves the right to vary and/or amend the terms of this Policy from time to time.

