

Intellias Ethics Committee

ANTI-SLAVERY AND HUMAN TRAFFICKING

POLICY

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1 INTRODUCTION

Intellias is a company created by people, for people. We foster a culture of partnership, caring, and respect. We will never back down on that no matter how fast we grow. We are sincerely committed to making everyone feel welcome, connected, and heard. This is the environment in which Intellias tech solutions are born.

This Anti-Slavery and Human Trafficking Policy (“Policy”) must be read in conjunction with other organizational documents, such as:

- Intellias Code of Conduct

Other related documents that Intellias may adopt in the future.

2 DOCUMENT PURPOSE

Intellias is dedicated to upholding ethical standards and maintaining integrity in all of its business dealings and relationships. To enforce this Policy, the company maintains robust systems and controls that ensure the prevention of modern slavery in all areas of its operations and supply chains.

Intellias will not knowingly enter a partnership or conduct business with any individual or organization that either exposes people to abuse and exploitation; or tolerates discrimination, harsh or inhumane treatment of its employees or agents.

3 DOCUMENT SCOPE

This Policy applies to all persons associated with Intellias, such as those performing services for or on behalf of Intellias in any capacity, including directors, officers, employees at all levels, agents, subsidiaries, consultants, subcontractors, and company business partners, whether an individual or an incorporated or unincorporated body (“Associated Persons”).

4 MODERN SLAVERY

Modern slavery is an illegal exploitation of people for personal or commercial gain, including sexual exploitation, domestic servitude, forced labor, criminal exploitation, human trafficking and organ harvesting.

Modern slavery is both a criminal act and a grave violation of fundamental human rights, manifesting in diverse forms that all share a common feature: the deprivation of an individual's liberty by another, intending to exploit them for personal or commercial gain.

Forced or compulsory labor is any work or services people are forced to do against their will under threat of punishment.

Forced child labor is work that deprives children of their childhood, potential, and dignity inflicting harm upon their physical and mental development.

Human trafficking is the recruitment, transportation, transfer, harboring, or receipt of persons by means of threat or use of force or other forms of coercion with the intent of exploiting a person for sexual exploitation, forced labor, or slavery, among other forms.

4.1 General principles

Intellias implements the following principles in its practices:

- Non-support of any organization or activity that causes, promotes, or contributes to modern slavery or human trafficking.
- Non-engagement with any entity or organization that causes, promotes, or contributes to modern slavery or human trafficking.
- Victim support in the form of remediation and justice.
- Maintenance of transparent supply chains.
- No distinction is made between public officials and private individuals: modern slavery is unacceptable, irrespective of the status of those involved.

4.2 Commitment

Intellias is committed to:

- Ensuring that all relevant parties are informed about this Policy.
- Being an equal-opportunity employer that operates on the principles of respect, inclusion, and diversity.
- Maintaining comfortable and safe workplace conditions, where every employee can thrive and develop professionally within an ethical work environment.
- Prohibiting the use of forced labor, human trafficking, and any form of slavery or servitude, regardless of the age of the individuals involved. The company expects its suppliers to hold their own suppliers, business partners, and vendors to the same high standards.
- Promoting a zero-tolerance approach towards modern slavery in any part of its own business.

This commitment implies:

- Consulting with external and internal stakeholders, experts, and professional organizations.
- Organizing educational training and slavery & human trafficking awareness events for employees.
- Seeking to ensure, where reasonably practicable, that our contractors, suppliers, and other business partners are contractually obliged to comply with terms that reflect the spirit and intention of this Policy in their own businesses.
- Taking immediate action on eliminating any cases of modern slavery and informing about the results in Ethics Committee reports.
- Prohibiting the employment of individuals under the age of 18.

4.3 Responsibility

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Intellias or under its control.

Intellias has overall responsibility for ensuring this Policy complies with our legal and ethical obligations and that all those under our control comply with it. Intellias has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring it is effectively countering modern slavery.

Management at all levels is 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.

Every Associated Person bears the responsibility of upholding ethical conduct and demonstrating integrity. They are encouraged to raise any concerns regarding modern slavery within the context of their work and to propose suggestions for improving this Policy.

5 COMMUNICATION AND TRAINING

Intellias organizes periodic training for its employees and/or other Associated Persons to familiarize them with the requirements of Intellias Code of Conduct and this Policy. Also, when considered relevant, Intellias may provide other written, visual, or oral communication to declare its zero-tolerance approach to modern slavery and describe its standards and procedures.

6 COMPLAINTS PROCESSING

Associated Persons must ensure that they have read, understood, and complied with this Policy. It is their obligation to refrain from engaging in any activity that could potentially result in or imply a violation of this Policy.

Associated Persons are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Intellias business or supply chains of any supplier tier at the earliest possible stage.

Any person who believes that they have been subjected to harassment or have been a witness in violation of this Policy, should report the issue by either sending an email to their Line Manager/**Ethics Committee** or by submitting the **anonymous form** with no delay.

All issues are treated confidentially to the extent possible. Intellias guarantees that such a request will be considered and will not have any negative consequences for the person who filed the complaint.

Intellias aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. Intellias is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of Intellias own business or any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern.

It is important for Intellias to ensure that no kind of discrimination is tolerated. If you have thoughts, ideas, and suggestions for improving our policies or projects, please share them with the **CSR Team**.

7 CONSEQUENCES OF NON-COMPLIANCE

Compliance with this Policy is essential for maintaining the trust and integrity at Intellias. Any person who breaches this Policy will face disciplinary actions, including but not limited to counseling, reassignment, suspension, termination, or legal consequences, as deemed appropriate based on the circumstances.

8 POLICY REVIEW AND MONITORING

Intellias shall regularly monitor the effectiveness of this Policy and review how it is implemented.

The Policy is to be reviewed:

- In conjunction with any change in the modern slavery laws affecting the procedures provided for in this Policy
- In the event, a significant breach of this Policy is discovered
- On a yearly basis.

9 REFERENCES

- **Intellias Code of Conduct**
- **Anti-Corruption and Anti-Bribery Policy**
- **ISO 9001-2015 Quality Management System. Requirements**
- **ISO/IEC 27001:2013 Information Technology – Security techniques – Information security management systems – Requirements**
- **Compliance Policy**
- **ILO Declaration on Fundamental Principles and Rights at Work**
- **International bills of human rights**
- **UN Guiding Principles on Business and Human Rights**

ILO Conventions on child labor are Convention No.138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labor