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# MODERN SLAVERY STATEMENT 2024





West Advanced Technologies Limited is committed to upholding the principles of human rights and ethical business practices. As an organization deeply rooted in integrity and transparency, we recognize the severity of modern slavery and human trafficking as grave violations of fundamental human rights. In alignment with the Modern Slavery Act 2015 and other relevant legislations, West Advanced Technologies Limited hereby presents its statement outlining the measures undertaken to combat modern slavery and human trafficking within our operations and supply chains.

Recognizing the challenges of identifying victims, we employ rigorous systems and controls to detect and address potential instances of exploitation. Transparency and accountability guide our actions, as we fulfil our obligations under the law.

Furthermore, we hold our suppliers and partners to the same high standards, incorporating specific prohibitions against forced labour into our contracting processes. This policy applies to all individuals working for West Advanced Technologies Limited, reflecting our commitment to ethical business conduct and human rights.

In our pursuit of a world free from modern slavery, we remain dedicated to upholding the dignity and rights of all individuals, fostering an environment where human rights are respected universally.

## Our Commitment

West Advanced Technologies Limited is dedicated to conducting its business with the utmost legal and ethical standards, ensuring that all aspects of our operations and supply chains are free from modern slavery and human trafficking.

# Organization's Structure, Business, and Supply Chains

West Advanced Technologies Limited, a pioneering technology solutions provider, operates globally with a widespread presence across numerous countries. Headquartered in the United Kingdom, we have branches in India and the United States, enabling us to serve clients worldwide.

Specializing in a wide array of services, ranging from enterprise applications to digital transformation, West Advanced Technologies Limited serves clients worldwide with a commitment to excellence and innovation. Our organizational structure is designed for efficiency and collaboration, with an executive leadership team guiding the strategic direction of the company. Reporting to them are various departments overseeing sales and marketing, research and development, client services, and operations. At every level, we foster a culture of empowerment and continuous learning, encouraging all employees to contribute ideas and initiatives that drive innovation and growth.

In operations, West Advanced Technologies leverages cutting-edge technologies such as IoT, Artificial Intelligence, Machine Learning, Robotic Process Automation, and Testing Automation to develop customized solutions tailored to our clients' unique needs. Our expertise in Enterprise Applications, including Infor, Oracle, and Analytics, further enhances our value proposition, delivering solutions that not only meet but exceed expectations. Our design thinking-led approach ensures that our solutions are not only technologically advanced but also user-friendly and intuitive, driving user adoption and satisfaction.

In managing our supply chains, West Advanced Technologies collaborates with a network of trusted suppliers and partners globally, maintaining strict quality control standards to ensure that all components meet our rigorous specifications. Our supply chain management team works closely with suppliers to monitor inventory levels, optimize logistics, and mitigate any potential risks or disruptions. Additionally, we prioritize ethical sourcing practices, ensuring that our suppliers adhere to fair labor practices and environmental regulations.

By maintaining a robust and transparent supply chain, West Advanced Technologies delivers high-quality solutions to our customers on time and within budget, enhancing customer satisfaction and loyalty. Our commitment to ethical business practices, technological innovation, and customer satisfaction drives our operations and supply chain management, enabling us to achieve our mission of delivering sustained long-term value to our customers globally.

As we continue to expand our global operations, West Advanced Technologies Limited remains steadfast in our commitment to upholding human rights and fostering an environment of integrity and respect. Through our sustained efforts, we strive to make a positive impact on the technology landscape while safeguarding the well-being of individuals across our organization and supply chain.

# Policies on Slavery and Human Trafficking

At West Advanced Technologies Limited, we are committed to upholding internationally recognized human and labor rights across all aspects of our business operations. As a global IT solutions company, we recognize the importance of respecting human dignity and ensuring fair treatment of workers throughout our value chain.

Our commitment to human and labor rights is guided by various international standards, including the Universal Declaration of Human Rights (UDHR) and the core labor conventions of the International Labour Organisation (ILO). We adhere to the principles outlined in these instruments, including the ILO Declaration on Fundamental Principles and Rights at Work and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

West Advanced Technologies Limited is firmly committed to preventing and addressing human and labor rights abuses, including but not limited to child labor, forced and bonded labor, modern slavery, and human trafficking. We undertake comprehensive efforts to identify and mitigate risks of modern slavery and human trafficking within our organization and supply chains.

Our commitment to ethical business practices extends to our relationships with suppliers and partners. We expect our suppliers to adhere to the same high standards of integrity and ethical behaviour outlined in our policies. To ensure compliance, we have implemented a robust third-party risk management framework that strategically assesses and manages risks associated with third parties.

## We prioritize the following human rights principles:

- Ensuring just and favorable conditions of work and associated rights.
- Promoting equality and non-discrimination.
- Safeguarding physical and mental health.
- Respecting the right to privacy.

Furthermore, West Advanced Technologies Limited actively engages with stakeholders on human rights-related issues and collaborates with industry bodies to promote respect for human rights across our sector. We continuously evaluate and enhance our policies and procedures to align with evolving international standards and best practices.

Through these concerted efforts, West Advanced Technologies Limited reaffirms its dedication to creating a responsible, positive, and inspiring environment for our people globally while contributing to the advancement of human rights and labor standards worldwide.



# Due Diligence Processes

West Advanced Technologies Limited adopts a diligent approach to managing the risks associated with modern slavery and human trafficking within our supply chain. We prioritize transparency and accountability in our commitment to combatting these issues, both internally and externally.

To ensure our commitment is known and adhered to, we publicly communicate our stance on modern slavery and human trafficking via our official channels, including our website. Internally, all employees are required to abide by our policies, which emphasize our zero-tolerance approach to modern slavery and human trafficking. We are also in the process of implementing contractual requirements for all suppliers to explicitly state their commitment to these principles in their agreements with West Advanced Technologies.

In our supplier screening processes, we integrate considerations of modern slavery risks from the outset. Initial screenings include discussions on responsible business practices, including compliance with applicable laws and adherence to our Responsible Supply Chain Principles. These principles serve as a foundational framework for ethical conduct in our supply chain relationships.

For our largest suppliers by spend, we conduct corporate responsibility screenings to assess their commitment to ethical business practices, including their stance on modern slavery and human trafficking. Additionally, we regularly survey our suppliers to gauge their understanding of and compliance with our expectations.

Considering the nature of our procurement activities, which primarily involve skilled services such as enterprise applications and digital transformation solutions, we assess the risk of modern slavery to be low. These activities typically require specialized knowledge and expertise, reducing the likelihood of exploitation within our supply chain. Nonetheless, we remain vigilant and proactive in identifying and mitigating any potential risks.

At West Advanced Technologies, we are committed to upholding the highest ethical standards and ensuring that our supply chain reflects these values. Through ongoing due diligence and collaboration with our suppliers, we strive to create a supply chain environment free from modern slavery and human trafficking, contributing to a more ethical and sustainable business ecosystem.

# Risk Management

West Advanced Technologies Limited employs a proactive approach to identify and mitigate the risks associated with modern slavery and human trafficking, both within our organization and throughout our supply chains. Recognizing the gravity of these issues, we have established robust policies and procedures aimed at addressing potential risks effectively.

To evaluate modern slavery risks within our operations and supply chains, we conduct regular assessments, considering both internal and external factors. This assessment involves identifying strategic suppliers and analysing actual and potential risk factors associated with supplier location, commodity, manufacturing type, and sector. Factors such as country risk profiles, industry standards, and audit results are considered to determine the level of risk.

We recognize that certain groups, such as migrant workers, contract workers, and vulnerable populations, are particularly susceptible to modern slavery. As part of our risk assessment, we prioritize identifying and addressing risks associated with these vulnerable groups. Additionally, we acknowledge that some countries present higher risks for modern slavery due to factors like weak labour law enforcement and prevalence of exploitative practices.

To mitigate supply chain risks, we conduct thorough audits of prospective suppliers, particularly those identified as high-risk. These audits include on-site inspections, interviews with management and workers, and reviews of relevant documentation. Identified issues are promptly investigated, and corrective action plans are developed in collaboration with the supplier.

Within our organization, we have implemented robust systems to identify and address potential modern slavery risks. These include regular record analysis, red flag identification, and reporting mechanisms for concerns. We also provide support to whistleblowers through a confidential helpline, fostering a culture of accountability and transparency.

Furthermore, we actively engage with industry organizations such as the Association of Labour Providers (ALP) and Stronger Together to strengthen our processes and enhance our ability to prevent and detect modern slavery concerns. By collaborating with stakeholders and implementing proactive measures, West Advanced Technologies Limited is committed to mitigating the risks of modern slavery and human trafficking across our operations and supply chains.

# Effectiveness and Performance Indicators

To measure our effectiveness in combating slavery and human trafficking, we utilize various performance indicators, such as audit findings, supplier compliance rates, and employee training completion rates. Our continuous monitoring and improvement processes enable us to address any identified issues promptly.

**Supplier Compliance Rate:** We measure the percentage of our suppliers that adhere to West Advanced Technologies's anti-slavery and human trafficking standards, as outlined in our contracts and agreements. This indicator helps us gauge the effectiveness of our due diligence processes in ensuring supplier compliance with ethical standards.

**Incident Response Time:** We track the time it takes for us to respond to and address reported incidents or allegations related to modern slavery or human trafficking within our supply chain. A shorter response time indicates a more proactive approach to remediation.

**Number of Audits Conducted:** We monitor the frequency and scope of audits conducted at supplier facilities to assess compliance with anti-slavery and human trafficking policies. Increasing the number of audits enhances our oversight and helps identify potential risks more effectively.

**Corrective Action Plan Implementation Rate:** We evaluate the rate at which corrective action plans are implemented by suppliers in response to identified non-conformances related to modern slavery and human trafficking. This metric reflects the effectiveness of our remediation efforts.

**Training and Capacity Building Initiatives:** We measure the participation rate of our suppliers and employees in training and capacity-building programs focused on raising awareness of modern slavery and human trafficking risks. Increased participation indicates enhanced awareness and preparedness to mitigate risks.

**Stakeholder Engagement Feedback:** We gather feedback from stakeholders, including employees, suppliers, and community members, regarding our efforts to address modern slavery and human trafficking. Positive feedback indicates that stakeholders perceive our actions as effective and impactful.

**Membership in Industry Initiatives:** We monitor our participation in industry initiatives aimed at combating modern slavery and human trafficking, such as responsible sourcing groups or multi-stakeholder initiatives. Active involvement demonstrates our commitment to collaborative efforts to address these issues.

**Continuous Improvement Measures:** We evaluate the effectiveness of our continuous improvement measures in enhancing anti-slavery and human trafficking initiatives. This includes reviewing the implementation of recommendations from audits and assessments to drive ongoing improvement.

**Compliance with Regulatory Obligations:** We ensure compliance with relevant regulatory obligations related to modern slavery and human trafficking, such as reporting requirements under applicable laws. Adherence to regulatory obligations demonstrates our commitment to legal compliance and ethical standards.

**Monitoring of High-Risk Suppliers:** We closely monitor high-risk suppliers identified through risk assessments and due diligence processes to ensure ongoing compliance with anti-slavery and human trafficking standards. Enhanced monitoring helps us detect and address risks in a timely manner.

# Training and Capacity Building

At West Advanced Technologies Limited, we are dedicated to equipping our employees with the knowledge and skills needed to effectively identify and address instances of modern slavery and human trafficking. Our training program is designed to empower our team members to play an active role in combating these issues within our organization and supply chains. Here's an overview of our training approach:

## **Comprehensive Curriculum:**

Our training curriculum covers various aspects of modern slavery and human trafficking, including recognizing indicators, understanding legal frameworks, and utilizing appropriate reporting channels. The content is tailored to provide practical insights relevant to our business operations.

## **Mandatory Participation:**

Participation in the training program is mandatory for all employees. By ensuring universal participation, we create a shared understanding of the importance of preventing modern slavery and human trafficking, fostering a culture of responsibility and vigilance across the organization.

## **Regular Refresher Courses:**

We conduct regular refresher courses to reinforce key concepts and provide updates on emerging trends or legislative changes related to modern slavery and human trafficking. These courses serve as valuable opportunities for ongoing learning and skill enhancement.

## **Supplier and Partner Engagement:**

Our training program emphasizes the critical role of ethical conduct not only within our organization but also among our suppliers and business partners. Employees are educated on the importance of selecting and engaging with partners who share our commitment to anti-slavery principles.

## **Confidential Reporting Mechanisms:**

We provide clear guidance on confidential reporting mechanisms, ensuring that employees feel comfortable reporting any suspicions or concerns related to modern slavery or human trafficking. This includes anonymous reporting channels to encourage transparency and accountability.

## **Continuous Evaluation and Improvement:**

We continuously evaluate the effectiveness of our training program through feedback mechanisms and performance indicators. Insights gathered from employees and stakeholders are used to refine and enhance the program, ensuring its relevance and impact over time.

By investing in comprehensive training initiatives, West Advanced Technologies Limited reaffirms its commitment to upholding human rights and ethical standards in all aspects of our operations. Through education and awareness, we empower our employees to be proactive advocates for social responsibility, driving positive change within our organization and beyond.



# Ongoing Efforts

West Advanced Technologies Limited reaffirms its commitment to combat modern slavery and human trafficking. We will intensify internal awareness initiatives, enhance training programs, and adopt global third-party risk management policies and tools. By empowering stakeholders and aligning with industry best practices, we continuously strive to foster a culture of accountability and drive improvement in our modern slavery prevention endeavours. This ongoing commitment underscores our dedication to upholding human rights and contributing to the global fight against modern slavery.

This statement has been approved by the board of directors of West Advanced Technologies Limited and is signed on their behalf by

**Srini Veeramasu**

**President**

**West Advanced Technologies Limited**

**29<sup>th</sup> Oct 2024**

Signature: \_\_\_\_\_

