

CivicDataLab's Policy on Ethical Labour Practices

1. Introduction

CivicDataLab Private Limited is committed to the highest ethical standards and ensuring that modern slavery and human trafficking do not occur within our operations, or any of our business relationships. As a company, we uphold the principles of human dignity, respect for individual rights, and ensuring fair treatment for all. This Ethical Labour Practices policy outlines our commitment to identifying, preventing, and addressing any risks of modern slavery, forced labor, or human trafficking within our business operations.

2. Purpose of the Policy

The purpose of this policy is to:

- Ensure CivicDataLab is in compliance with relevant laws, including the **Bonded Labour System (Abolition) Act 1976** and similar legislation applicable in other jurisdictions where we operate.
- Establish a clear and consistent approach to preventing modern slavery and labour exploitation in all forms within CivicDataLab's operations.
- Promote a culture of transparency, responsibility, and ethical business practices across the organization.

3. Definition of Modern Slavery

Modern Slavery refers to situations where coercion, threats, or deception are used to exploit individuals and deprive them of their freedom. It encompasses forced labor, human trafficking, child labor, and other forms of exploitation. Modern slavery can exist in various forms, including, but not limited to:

- **Forced Labor:** Work or service that is extracted from any person under the threat of penalty or for which the person has not offered themselves voluntarily.
- **Human Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of persons by means of threat, force, fraud, or coercion for the purpose of exploitation.
- **Child Labor:** Any form of work or service that deprives children of their childhood, education, and potential.

4. Prohibited Conduct

CivicDataLab strictly prohibits any form of modern slavery or human trafficking within our business including:

- Using forced labor or any labor that is coerced, involuntary, or under duress.
- Engaging in or being complicit in human trafficking or child labor.
- Exploiting workers by providing unsafe working conditions, unfair compensation, or violating labor laws.
- Using any third-party suppliers or contractors who are known or suspected of being involved in modern slavery practices.

5. Due Diligence and Supply Chain Management CivicDataLab commits to performing thorough due diligence before engaging with new suppliers and partners to ensure that they adhere to our commitment to preventing modern slavery. This includes:

- Evaluating potential suppliers and third-party vendors based on their policies, practices, and compliance with anti-slavery legislation.
- Requiring suppliers and partners to demonstrate compliance with this policy and similar anti-slavery principles.
- Conducting regular audits to assess and ensure compliance with anti-slavery practices in our organisation.

6. Employee Rights and Support CivicDataLab values the rights and dignity of all employees and strives to:

- Provide a safe, healthy, and supportive work environment free from any form of exploitation or mistreatment.
- Ensure all employees are free to leave their employment if they choose, without fear of retaliation or unlawful treatment.
- Provide clear channels for employees to report any concerns regarding modern slavery or exploitation, ensuring that reports will be treated confidentially and investigated thoroughly.

7. Training and Awareness CivicDataLab will provide training on modern slavery to all employees, directors, and relevant third-party partners. This training will cover:

- Identifying signs of modern slavery and human trafficking.
- The ethical and legal implications of modern slavery.
- The company's reporting channels and responsibilities in addressing any suspicions of modern slavery.

8. Reporting and Whistleblowing We encourage all employees, partners, and stakeholders to report any suspicions or evidence of modern slavery within our operations. Reports can be made anonymously and will be treated confidentially. CivicDataLab ensures that no individual who reports concerns in good faith will face retaliation.

9. Consequences of Violation Any employee, supplier, or third-party partner found to be in violation of this policy may face disciplinary action, including termination of employment or contract, and legal action where applicable. CivicDataLab will take all necessary steps to investigate and address any violations of this policy and applicable laws.

10. Monitoring and Review CivicDataLab will monitor its operations regularly to assess the effectiveness of this policy. The company will review and update this policy periodically to ensure compliance with changing legislation and best practices. Additionally, we will continuously evaluate the risks of modern slavery within our operations and take appropriate action to address any identified risks.

11. Compliance with Local and International Laws This policy complies with the provisions of the Modern Slavery Act 2015 (UK), the Bonded Labour System (Abolition) Act 1976, and other relevant laws and international standards. CivicDataLab is committed to aligning its practices with global best practices in the fight against modern slavery.

12. Conclusion CivicDataLab is committed to preventing modern slavery in all its forms and will ensure that ethical practices are maintained across its operations and supply chains. By adhering to this policy, we aim to uphold the rights and dignity of all individuals associated with CivicDataLab, ensuring a fair, just, and ethical working environment for everyone.
