



# Modern Slavery Act Policy

Human Resources

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## 1.0 Purpose:

Intellect is value-driven organization and we strive to meet the highest standards in all the operational aspects- Professional, Ethical, Legal and others. This statement is created by Intellect in pursuant to section 54 of the UK Modern Slavery Act 2015. We're committed to uphold human rights and have zero tolerance to slavery and human trafficking in our business or supply chain.

## 2.0 Our Business:

Intellect Design Arena Limited is a global leader in Financial Technology for Banking, Insurance and other Financial Services. With a rich suite of products across the organization, we are an authority on vertical and integrated products that enable institutions to meet their ambition to be the principal service provider to their customers. We create financial technologies that help banks lead businesses on the path to growth and success. Our solutions help move the banking world forward; because that's what happens when the world knows it has financial institutions they can rely on. This is the philosophy that we at Intellect follow and our commitment to our customers' success. For further information, kindly visit [www.intellectdesign.com](http://www.intellectdesign.com).

## 3.0 Code of Conduct:

Intellect's code of conduct (Refer i360 -> HR Policy -> Code of Conduct) sets the standards in various areas that our associates must adhere to in order to uphold the value of Intellect with high level of integrity and trustworthiness. This policy applies to all the associates of Intellect & its group companies including vendors and trainee. As a global company, Intellect has associates of different nationalities, culture and religious beliefs. This calls for commonly agreed ethical practices and standards. Although the code of conduct is applicable and enforceable in any country where Intellect performs its activities, associates are subject to the national laws and regulations in their respective countries of activity and to any law that apply specifically to their own nationalities. Intellect complies with the law of every country in which it operates. Where a local law sets higher standards than those set out in this code of conduct, the local law takes precedence.

## 4.0 Our Supply Chain:

We provide Fin-tech products for global leaders in banking, insurance and other financial services. Intellect has three major kind/variety of suppliers that help us to operate effectively and we take pride in upholding the dignity and pride of the same.. These suppliers abide by Intellect's code of conduct. These suppliers shall not employ children and shall not use forced or slave labor or any type for business operations.

- a. **Supplier of people:** This includes the associates of Intellect who are full time, vendors or contract employees & others. They support our business either in-house or client's location.
- b. **Supplier of services:** This includes our partners who provide essential services (transportation, canteen services, constructions & others).
- c. **Supplier of products:** Intellect partners with third parties to supply products (IT hardware, software, equipment, stationary & others).



## 5.0 Due diligence processes for slavery and human trafficking:

Intellect is circumspective and we undertake additional risk based checks identify elements of modern slavery in our routine supplier due diligence process. Suppliers' vetting process is rigorous and awareness of the same has been communicated to the colleagues who do the same.

- a. All potential suppliers of Intellect are checked against global sanctions and enforcement databases (for example, OFAC, World Bank Debarment List). They are subjected to adverse media review to identify risks including human rights abuses, human trafficking, and labour violations.
- b. We carry out planned audits on risk assessment of all of our potential suppliers, criteria for which include the risks of modern slavery based on the country of operation, as assessed by Global Slavery Index, and the nature of their work, such as reliance on low-skilled, temporary, seasonal or agency workers.
- c. Potential suppliers are identified as medium or high risk are subject to further vetting. In cases where there is a higher risk of modern slavery, an enhanced review is carried out of information which the supplier publishes about its approach to labour practices to ensure alignment with International Labour Organization's fundamental principles.

## 6.0 Supplier adherence to our values:

We have zero tolerance to slavery and human trafficking. Our contracts with our suppliers generally include terms concerning labour practices which require them to confirm compliance with the International Labour Organization's fundamental principles.

## 7.0 Our policy towards Slavery and human trafficking:

Intellect as an organization is committed to ensure that we have a conducive work environment. We condone the practice of modern slavery or human trafficking in our supply chain or in any part of our business. Our internal policies reflect our commitment to act ethically upholding integrity of all our business relationships. We ensure that there is effective mechanism in place that helps us to curtail unethical practices and ensure slavery and human trafficking is not taking place anywhere in our supply chain.

## 8.0 Further action:

In addition to the steps we have already set out above, we remain committed to improving our practices to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We also assess practices/ operations in Intellect on periodic basis and ensure that we don't have the practice of slavery and human trafficking in our organization.



### Revision History

| Version No. | Author          | Published Date | Sections Changed | Description of changes                                 |
|-------------|-----------------|----------------|------------------|--|
| 1.0         | Ramchandrakanth | 01-Sept-19     | -                | New Policy for Intellect Design Arena Limited          |
| 1.1         | Ramchandrakanth | 01-June-20     | -                | Review system updated for Annual                       |
| 1.2         | Ramchandrakanth | 01-Jan-21      | -                | Policy has been reviewed and published without changes |
| 1.3         | Ramchandrakanth | 01-Jan-22      | -                | Policy has been reviewed and published without changes |
| 1.4         | Ramchandrakanth | 01-Jan-23      | -                | Policy has been reviewed and published without changes |
| 1.5         | Ramchandrakanth | 01-Jan-24      | -                | Policy has been reviewed and published without changes |
| 1.6         | Ramchandrakanth | 01-Jan-25      | 3.0              | Code of conduct reference                              |
| 1.7         | Ramchandrakanth | 01-Jan-26      | -                | Policy has been reviewed and published without changes |



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