



POETICGEM LIMITED

Modern Slavery and Human Trafficking Policy

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INTRODUCTION

Poeticgem Limited and its subsidiary, affiliates, joint ventures and group companies (henceforth jointly referred to as “**Poeticgem**”) are committed to protecting Human Rights and prohibiting all acts of human trafficking, slavery, servitude, forced marriage, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, and child labour throughout the organization, its business and supply chain. Poeticgem herein elucidates its initiatives to mitigate/eradicate modern slavery and human trafficking from its business and supply chain.

OVERVIEW

Organization Structure

Poeticgem headquartered in London, United Kingdom is a leading provider of integrated and customised solutions to global retailers and brands. It serves customers/clients across various countries, most predominantly in the United Kingdom, United States, European Union etc.

With a blend of extensive industry experience and a discerning design sense, Poeticgem address the swiftly changing preferences and demands of global fashion businesses. Poeticgem approach is guided by the principles of the right product, the right market, and the right factory, ensuring that Poeticgem deliver high-quality and ethically produced goods. Collaboration lies at the core of Poeticgem's business philosophy as Poeticgem works alongside its partners and the environment to foster sustainable growth.

A company recognized globally for its comprehensive portfolio of services, a strong commitment to sustainability and good corporate citizenship.

Supply Chain Overview

Poeticgem's supply chain is innately linked to its successful growth and works end-to-end to incorporate specific industry experience as well as a cross-industry perspective to help seed continuous innovation. Through advanced recycling techniques, reimagined supply chains, and innovative business models, Poeticgem's vision extends beyond its own operations. Poeticgem aspire to collaborate with partners, suppliers, and stakeholders who share our commitment to sustainability and circularity.

RISKS OF MODERN SLAVERY

Poeticgem follows a risk-based assessment of its complex operation and supply chain. Poeticgem understands that the population, location, industry/sector, type of products/services and categories of investments involved influence the level of such risk. Poeticgem is committed to a continuous improvement approach that effectively responds to modern slavery risks. Poeticgem has a well-defined criteria to identify high risk vendors, which include the industry its vendors operate in, labour intensity, financial stability, their audit records etc.

POLICIES

Poeticgem's internal policies and practices focus on anti-slavery and anti-human trafficking and are part of a larger effort to ensure transparency, accountability and safeguarding of Human Rights extended to its supply chain. These internal policies specify Poeticgem's commitment to upholding Human Rights, prohibiting slavery, servitude, forced labour, child labour and human trafficking. Poeticgem expects all those who work with and for it including without limitation, its personnel, supply chain and contractors, to read and comply with its policy and practices.

Poeticgem's Code of Conduct applies to all employees of Poeticgem. It specifically identifies and prohibits several forms of modern slavery. These include any act of human trafficking, slavery, servitude and forced or compulsory labour.

The Code of Conduct also highlights and disavows the practice of child labour throughout its business and its supply chain. Beyond its own prohibition of child labour, Poeticgem is committed to work in a proactive manner to eradicate child labour by directly and actively contributing to best practices, including only legitimate workplace apprenticeships, internships and other similar programmes that comply with all laws and regulations.

Supplier Code of Conduct

Poeticgem's Supplier Code of Conduct specifically requires suppliers to ensure that their employees are hired on their own free will and that they must prohibit forced, bonded, or any other form of compulsory labour such as slavery or trafficking, transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services in all of their operations. As part of Poeticgem's Supplier Code of Conduct, Suppliers and their agents are required not to confiscate any identity or immigration documents, such as government-issued identification cards, passports or work permits, unless required by law.

If suppliers do not comply with the Supplier Code of Conduct, or are found to be non-compliant with anti-slavery or anti-human trafficking practices in their business, or knowingly in their supply chain, Poeticgem retains the right to terminate the contract for services with immediate effect, including future blacklisting of the supplier concerned taking into account the extent of non-compliance and pursue legal remedies against the supplier concerned.

Poeticgem also endeavors to foster an environment of open and honest communication. Suppliers are encouraged to raise concerns with respect to any suspected violations of this Code or any other specific concern arising out of their business relationship with Poeticgem or its officers or employees to whistleblower@pdsltd.com.

DUE DILIGENCE AND REMEDIATION PROCESSES AGAINST MODERN SLAVERY AND HUMAN TRACKING

As part of its due diligence initiative to identify any modern slavery, Poeticgem –

- a. conducts assessments through internal and third party tools and reviews the reports internally prior to the on boarding of any vendor/partner.
- b. conducts background verification of potential employees in compliance with the local laws of the relevant country.
- c. retains the right to conduct independent unannounced audits of its on-boarded vendors/partners to ensure compliance with Poeticgem's Supplier Code of Conduct.

As part of its initiative to eliminate and further prevent modern slavery, Poeticgem –

- a. requires its vendors/partners to provide a declaration of compliance with its Supplier Code of Conduct.
- b. employs internal processes to ensure Poeticgem's employees and extended workforce are aware of and abide by Poeticgem's Code of Conduct.
- c. updated its standard procurement contracts to include anti-slavery and anti-human trafficking provisions.
- d. operates in licensed premises strategically limited in geographical scope to ensure optimum control and supervision of the work environment.
- e. strives to build long-standing relationships with local suppliers and customers to effectively communicate its business standards.

APPLICABILITY

This Policy applies to all persons working for Poeticgem on its behalf in any capacity, including employees at all levels, directors, associates, business partners, suppliers, stakeholders and external consultants.

RESPONSIBILITY

The Group ESG Director has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it and has primary and day-to-day responsibility for implementing this Policy. Poeticgem monitor its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.

Line Managers are 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.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for Poeticgem, and regular training will be provided as necessary. Equally, this Policy is communicated to all Poeticgem's suppliers, contractors and business partners at the start of a business relationship or renewal of a contract.

Poeticgem's zero-tolerance approach to modern slavery and human trafficking must be communicated to all suppliers, contractors and business partners at the outset of Poeticgem's business relationship with them and reinforced as appropriate thereafter.

BREACH OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Poeticgem may terminate its relationship with other individuals and organisations working on its behalf if they breach this Policy.

REDRESSAL MECHANISM

Poeticgem encourages all employees to promptly report any concerns or issues related to modern slavery within its supply chain. Such concerns can be communicated either directly to their immediate supervisor or by writing to the designated vigilance officer at whistleblower@pds ltd.com. Alternatively, employees may choose to report anonymously through the Navex hotline platform, accessible at <https://pds ltd.com/ethics-hotline/>.

REVIEW OF THIS POLICY

This Policy is reviewed and, if required, updated on an annual basis.
