

Forced Labor & Human Trafficking Policy



Norex is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. Norex will not tolerate or condone human trafficking or slavery in any part of our global organization. This policy is consistent with Norex's Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our global business practices. Norex employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Norex conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

Scope

This Policy applies to all personnel employed by or engaged to provide services to Norex, including, but not limited to, Norex's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees"). Every Norex employee is responsible for reading, understanding and complying with this Policy. Norex managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. If you have any questions or concerns relating to this Policy, consult the Human Resource department. If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading "Policy Compliance" below.

Definition

Forced Labor - means all work or service exacted from a person under threat or penalty (including slavery, servitude and forced recruitment), which includes penal sanctions and the loss of rights and privileges where the person has not offered himself or herself voluntarily.

Human Trafficking - means the act of recruiting, harboring, transporting, providing or obtaining a person for forced labor or commercial sex acts through the use of fraud, coercion (e.g., threats of serious harm or physical restraint or abuse or threatened abuse of the legal system) or deception.

Slavery - Slavery is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Given that legal 'ownership' of a person is not possible, the key element of slavery is the behavior on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

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Policy statement

Norex prohibits trafficking in persons and slavery. Norex employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Norex conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants/candidates recruitment fees.

Norex has undertaken actions and is committed to maintaining and improving its systems and processes, to eradicate human trafficking and slavery in its direct supply chain. Norex requires its direct supply chain suppliers to observe all applicable laws and conduct business in an ethical and responsible manner.

What should you do if you become aware of or suspect a violation of this policy?

Any suspicions or allegations of forced labour or human trafficking, supporting or facilitating forced labor or human trafficking, failing to report such activities, or any other violations of this policy must be promptly reported and investigated. All representatives have a responsibility to respond and act swiftly to such suspicions or allegations in a manner that ensures confidentiality and the safety of those making the claim. Any suspicions or allegations should be reported to your line manager or HR department.

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What are the sanctions for violations of this policy?

Sanctions for violating this policy, whether by engaging in, facilitating, and supporting trafficking activity or failing to report suspected trafficking activity, may include termination of employment, as well as referral to local law enforcement

Vaibhav Agrawal



Managing Director