

## Modern Slavery Statement & Human Trafficking

Version control:

Version	Reviewer	Approver	Review date	Status
2.0(latest)	Hepsita Dsouza	Shashidhar Shetty	17/01/2025	Completed
1.0	Shashidhar Shetty	John McCrae	18/07/2024	Completed

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*Published in accordance with the UK Modern Slavery Act 2015 (MSA)*

### Introduction

This statement sets out Abyasa's commitment to combat the practice of modern slavery, forced labour and human trafficking. It is also to understand the potential modern slavery risks related to its business and implement steps aimed at ensuring no slavery or human trafficking takes place in its own business and its supply chains.

This statement will be reviewed semi-annually by Abyasa executives on the day set by the Business policies & contracts co-ordinator.

### The Statement

Abyasa is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and to provide work environment that is free from human trafficking and slavery.

Abyasa strictly prohibits the use of modern slavery and human trafficking in our business operations and supply chain. Our expectations for responsible, ethical and legal conduct are applicable to all parties in our supply chain including our current outsourced partner Kloaket Technologies Private Limited based in India.

### Organisational Structure and Background

Abyasa Ltd is a UK private company developing software for the higher education market. We provide software for institutions involved in initial teacher education, the placement of students for school-based training or on work experience programmes. We currently have a team of developers, project managers, and customer support staff who work together to enhance the student placement experience.

We have one staff in the UK who work for Abyasa and in total 20 employees. We have 15+ customers across the UK.

### **Our Recruitment Selection Process**

We operate a rigorous recruitment selection process for all hiring decisions which includes obtaining documented proof of the individual's rights to work in the country in which they will be employed. We will always pay at least the minimum wage rate applicable in the geography in which they work.

Abyasa aims to ensure that all our people are treated fairly and with compassion and dignity throughout their employment and our Code of Conduct provides clear guidance on the standards of behaviour expected from all employees across all areas of business.

### **Our Supply Chain and Risks**

Abyasa has zero tolerance to slavery and human trafficking and requires its supply chain suppliers to observe all applicable laws and conduct business in an ethical and responsible manner.

Our major supplier is Kloaket Technologies Private limited based in India who is responsible for outsourcing the software development and customer support & services. Abyasa has a signed agreement with Kloaket to ensure that they practice the same level of ethical standards of behaviour as we have in place.

We have not identified any instances of modern slavery occurring in our supply chain and therefore it can be difficult to measure the effectiveness of our policies in reducing the risk of slavery and human trafficking.

### **Training**

All employees of both Abyasa and its outsourced partner take mandatory online training on our Code of Conduct each year, and an assessment must be completed to ensure understanding and acceptance of the policy. Individual assessments are tracked and monitored until successful completion.

We also train them on how to use our Grievance Board to raise complaints and concerns.

## Continuous Improvement and Training Commitment

Abyasa is committed to continuously improve its approach to combating modern slavery by:

- Regularly reviewing and updating procedures to align with evolving regulations, best practices and to ensure effective risk mitigation strategies are in place.
- Training and educating relevant personnel including employees to raise awareness of modern slavery risks.
- Addressing modern slavery in our Code of Conduct to ensure that employees, partners, and our supply chain uphold the highest ethical standards and are protected from any forms of injustice
- Encouraging openness and support anyone who raises genuine concerns related to this policy.

We will continue to assess whether circumstances warrant the inclusion of specific anti-slavery and human trafficking language in any of our policies governing business conduct.

**Abyasa** remains resolute in its commitment to combatting modern slavery and human trafficking and will persistently collaborate with our employees, suppliers, and stakeholders to uphold human rights and ethical standards across our global operations and supply chain.

Signed for and on behalf of Abyasa Limited

*Shashi Shetty*

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Shashidhar Shetty

Director

31<sup>st</sup> of January 2025