



UK MODERN SLAVERY ACT STATEMENT (SECTION 54)

INTRODUCTION

This Section 54 Modern Slavery Act Statement (the “**Statement**”) is made by TestingXperts Limited including its subsidiaries and affiliates (all collectively hereinafter referred to as “**TxMinds**”, “**Tx**”) pursuant to Section 54 of the Modern Slavery Act 2015 (United Kingdom) and any other applicable Modern Slavery Regulation. This Statement outlines the steps that Tx has taken during the financial year ending 2024-25 to ensure that modern slavery and human trafficking are not taking place within our business, or its supply chain. Tx is committed to maintaining the highest standards of ethical conduct and integrity in our business practices and supply chains.

We confirm that Tx meets the annual turnover threshold of £36 million and is therefore required to produce this annual statement. We are also closely monitoring proposed amendments to the Modern Slavery Act and will update our practices and this Statement in alignment with any future regulatory requirements or government guidance.

OUR BUSINESS AND SUPPLY CHAINS

Tx is a global leader in Quality Assurance (QA) testing and digital services, providing a wide range of services including software testing, digital transformation, and IT consulting. Our supply chains encompass various suppliers and partners involved in providing goods and services necessary for our operations. We recognize that some of these supply chains extend into regions that may be at higher risk for modern slavery and human trafficking.

OUR SUPPLY CHAIN

We have classified our suppliers into three major categories:

- **Suppliers of People:** This covers our contractors who work on our campuses/client projects and support our business.
- **Supplier of Services:** This covers our partners who provide essential services (such as catering, food and beverage counters, transportation, construction etc.) on our campuses.
- **Supplier of Products:** This covers our partners who supply products (such as IT hardware, software, electrical / electronic equipment, furniture, heavy equipment, stationery etc.) to us.

OUR POLICIES

To combat modern slavery and human trafficking, we have established and implemented robust policies, which are integral to our corporate governance framework:

- **Labour Standards Policy:** This policy underlines our zero-tolerance approach to modern slavery and human trafficking. It applies to all person working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, second workers, volunteers, interns, agents, contractors, and suppliers.
- **Supplier Code of Conduct Policy:** We have implemented a Suppliers Code of Conduct Policy to effectively manage our supply chain and ensure that all our suppliers adhere to the requirements of Section 54 of the Modern Slavery Act. This policy sets clear expectations for ethical conduct, labor standards, and human rights protection,



helping us prevent modern slavery and human trafficking within our business and supply chains. Additionally, we also incorporate the following practices:

- During onboarding, our suppliers are required to sign the Supplier Code of Conduct ("SCOC").
 - We insist, in our agreement, that our suppliers comply with local laws. In addition, we have updated our standard contractual terms to include obligations on our suppliers to comply with our position regarding anti-slavery and human trafficking.
 - We build long-standing relationships with local suppliers and make clear our expectations of business behavior.
 - We also strive to ensure that slavery and human trafficking is not taking place within any of our supply chain business partners, and we do not tolerate such activities either within the supply chain or within any part of Tx' business.
 - We audit our people suppliers in the United Kingdom at regular intervals for payment of minimum wages and social security contributions and train them on the Tx Code of Conduct. Our pay is always above the stipulated minimum wages. In our non-UK locations, we ensure checks comply with the requirements of local law in our supply chain.
- **Whistleblowing Policy:** We have an established whistleblowing mechanism that encourages employees, suppliers, and other business partners to report any concerns related to unethical behavior or practices, including any suspicions of modern slavery or human trafficking. Suppliers and their workers also have access to this mechanism and may report anonymously.
 - **Prevention of Sexual Harassment Policy:** We have a comprehensive Anti-Harassment Policy, including measures to prevent and address sexual harassment in the workplace. This policy ensures a safe and respectful work environment for all employees, providing clear procedures for reporting and addressing incidents of harassment.

DUE DILIGENCE AND RISK ASSESSMENT

We have implemented a comprehensive due diligence process to identify, assess, and mitigate risks related to modern slavery and human trafficking within our business and supply chains:

- **Risk Assessments:** Tx is in digital services and consulting industry and its activities involve low risk of Modern Slavery (human trafficking, slavery, forced labor, servitude, etc.). We have a robust process to ensure the risks of Modern Slavery in our Supply Chain are evaluated on an ongoing basis. Moreover, our Supplier Code of Conduct, our empanelment process and our contracting framework with our vendor partners have processes to evaluate any risks of Modern Slavery in our Supply Chain. Modern Slavery is a complex challenge which requires ongoing, evolving and continually improving efforts. We will continue to review our internal processes to ensure that our obligations under the Modern Slavery legislation are met.
- **Supplier Audits and Assessments:** We carry out regular audits and assessments of our suppliers to ensure compliance with our anti-slavery policies. This includes reviewing suppliers' labor practices, conducting site visits, and requesting corrective actions where necessary.
- **Contractual Obligations:** Our contracts with suppliers include specific clauses prohibiting the use of forced, compulsory, or trafficked labor, and requiring adherence to all applicable anti-slavery and human trafficking laws.



We also ensure that our Suppliers provide Right of Free Association to interact and organize among themselves to collectively express, promote, pursue for the protection of common interests.

TRAINING AND CAPACITY BUILDING

We provide ongoing training and support to ensure that both our employees and suppliers are aware of and can effectively respond to the risks of modern slavery and human trafficking. This includes regular training programs for employees and collaborative efforts with suppliers to promote understanding of our policies and their responsibilities.

PERFORMANCE INDICATORS AND CONTINUOUS IMPROVEMENT

We are committed to continuously improving our efforts to combat modern slavery. We regularly review and update our policies, risk assessments, and due diligence processes to ensure they are effective. We track performance through key indicators such as:

- Percentage of suppliers audited
- Number of employees trained in anti-slavery measures
- Number of concerns raised through our whistleblowing mechanism

Additionally, we actively engage with industry bodies, non-governmental organizations, and other stakeholders to stay informed about emerging risks and best practices in combating modern slavery.


STATEMENT ACCESSIBILITY

This Statement is published on our company website with a prominent link available on the homepage to ensure public accessibility and transparency.

CONCLUSION

Tx is steadfast in our commitment to preventing modern slavery and human trafficking in all aspects of our business and supply chains. This statement has been approved by the Chief Executive Officer and will be reviewed and updated annually to reflect our ongoing efforts and commitment.

We are closely monitoring proposed amendments to the Modern Slavery Act and will update our practices and this Statement in alignment with any future regulatory requirements or government guidance.

Signature: 
Approver: Manish Gupta
Designation: Chief Executive Officer
Company Name: Tx Limited

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