



# Mindtickle Anti-Slavery Statement

Version	1.0
Document ID	Anti-Slavery Statement
Date	01- October -2025
Author	People Success
Reviewer	SVP - People Success & CEO
Approver	CEO
Classification	Mindtickle – Confidential

Change History			
Date	Version	Author	Description of change
01-October -2025	1.0	People Success	The initial outline of the document

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Mindtickle Inc., and its affiliates (henceforth jointly referred to as “Mindtickle”/ “we”/ “us”) recognizes that modern slavery is a grave crime and a profound violation of fundamental human rights. We have a zero-tolerance approach to modern slavery, human trafficking, and all forms of forced or compulsory labour, and we are committed to acting ethically and with integrity in all our business dealings and relationships. This Statement details the actions and steps taken by Mindtickle to ensure that these practices are not occurring anywhere in our own business or our supply chains. We are dedicated to upholding the highest ethical standards and respecting internationally recognized human rights, extending these expectations to all of our contractors, suppliers, and business partners.

## 1. Our Business and Commitment

Mindtickle is a global leader in sales readiness and training platforms, providing knowledge-based digital services and consulting. We operate globally, leveraging a diverse workforce and international supplier base.

We maintain a zero-tolerance approach to modern slavery, including all forms of slavery, servitude, forced or compulsory labour, and human trafficking. Our commitment is guided by the UN Guiding Principles on Business and Human Rights (UNGPs) and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

## 2. Risk Assessment and Due Diligence

As a technology and digital services company, Mindtickle recognizes its low-risk profile but remains vigilant in managing risks, particularly within its extended supply chain.

- A. Low-Risk Profile:** Our core operations involve highly-skilled, knowledge-based roles that are geographically diverse, the risk of modern slavery in our direct workforce being inherently low.
- B. Supply Chain Categorisation and High-Risk Focus:** Our supply chain is broadly categorized, and due diligence efforts are focused on areas with greater exposure to manual labour and manufacturing risk:
  - **Suppliers of Products (IT Hardware/Equipment):** Risks related to the sourcing of raw materials, electronics, and manufacturing of computing assets.
  - **Suppliers of Services (Facilities/Operations):** Essential non-knowledge services, such as campus cleaning, security, catering, and office maintenance.
  - **Suppliers of People (Extended Workforce):** Third-party contractors or agencies providing operational support staff.

### Due Diligence Steps Taken

We have implemented the following due diligence procedures:

- **Third-Party Screening:** We initiated the use of third-party tools for screening and due diligence checks on new high-value vendors before onboarding and during contract renewals.
- **Contractual Compliance:** Our standard contracts are reviewed from time to time to include specific requirements for suppliers to comply with all applicable local laws, reinforcing our expectations across the value chain.
- **Supplier Declaration:** We require a declaration of compliance with Mindtickle's Supplier Code of Conduct from all strategic vendors.
- **Internal Audits:** We retain the right to conduct risk-based audits and perform internal checks on strategic vendors supplying support staff (e.g., payment of minimum wages and social security contributions) to ensure compliance with local laws.

### 3. Our Policies and Employee Principles

Our Anti-Slavery and Human Rights commitments are formalized through key internal documents:

- **Mindtickle's Code of Business Conduct:** This policy sets forth the core values, shared responsibilities, and commitment to conducting business ethically, prohibiting all forms of abuse, discrimination, and forced labour.
- **Voluntary Employment:** We ensure that employment is freely chosen and is 'at will'.
- **Child Labour:** We strictly prohibit child labour and only engage in legitimate internships that comply with all minimum age and working hour regulations.
- **Fair Employment:** We provide clear, written contracts detailing remuneration, and prohibit discrimination or harassment based on protected characteristics.

### 4. Remediation and Reporting

We maintain a confidential Whistleblower Policy which is available to all employees, contractors, and external stakeholders globally. This channel allows for the anonymous reporting of suspected ethical violations, including any concerns related to modern slavery or human trafficking. We strictly enforce a non-retaliation to protect those who raise genuine concerns in good faith.

### 5. Investigation and Remedy

Where a human rights violation or modern slavery is identified, Mindtickle commits to:

- Immediate Investigation:** Promptly investigate the root cause in collaboration with all involved parties.
- Access to Remedy:** Seek access to remedy, compensation, and justice for the victim through legitimate processes.
- Corrective Action:** Require the involved supplier or partner to implement a corrective action plan with clear timelines and accountability, terminating the relationship in cases of severe or uncorrected non-compliance.

## 6. Training and Effectiveness (Key Performance Indicators)

### Training and Awareness

- **Targeted Training:** We provide mandatory training on this anti-slavery and human trafficking policy to all relevant employees, specifically focusing on Procurement, People Success, Talent Team and Management teams.
- **Supplier Communication:** Our zero-tolerance approach was communicated at the outset of the relationship and reinforced through contract documentation with all major business partners.

### Consultation

The policies and procedures outlined in this statement are uniform across all of Mindtickle's subsidiaries and branches. Teams across all branches and subsidiaries operate collaboratively to ensure each of Mindtickle's policies are appropriately enforced and upheld. Mindtickle continuously reviews the sufficiency and effectiveness of its policies and programs.

Further, the Board of Directors authorized Mr. Krishna Depura (Chief Executive Officer) to approve any modifications to the annual modern slavery statements as required due to regulatory requirements.

**For Mindtickle:**

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**Krishna Depura**  
Chief Executive Officer