



ANTI-MODERN SLAVERY & HUMAN TRAFFICKING POLICY



1. Introduction

AKULAND GROUP is committed to conducting its business ethically, responsibly, and with respect for human rights and dignity. The Group maintains a zero-tolerance approach to modern slavery, forced labour, child labour, servitude, and human trafficking in all its operations, supply chains, and business relationships.

We are committed to ensuring that our employees, contractors, suppliers, and business partners operate in an environment free from exploitation, coercion, abuse, and inhumane treatment.

2. Purpose

The purpose of this Policy is to:

- Prevent modern slavery and human trafficking within the Group's operations and supply chains;
- Promote ethical labour practices and respect for human rights;
- Ensure compliance with applicable labour and anti-trafficking laws;
- Establish standards for identifying, reporting, and addressing risks related to modern slavery;
- Protect the welfare, dignity, and freedom of all workers associated with the Group.

3. Definition of Terms

Modern Slavery

A broad term covering serious exploitation, including forced labour, servitude, debt bondage, child labour, and human trafficking.

Human Trafficking

The recruitment, transportation, transfer, harbouring, or receipt of persons through force, coercion, fraud, or deception for exploitation.

Forced Labour

Work or services exacted from a person under threat, coercion, intimidation, or without voluntary consent.

Child Labour

Employment of children in work that deprives them of their childhood, education, health, safety, or development, contrary to applicable laws and standards.

Supply Chain

The network of suppliers, contractors, subcontractors, and service providers involved in the production and delivery of goods and services.



4. Scope

This Policy applies to:

- Directors and management;
- All employees, whether permanent, temporary, or contract staff;
- Consultants, contractors, agents, and intermediaries;
- Suppliers, vendors, and business partners acting on behalf of AKULAND GROUP.

The Policy applies across all subsidiaries, affiliates, projects, operations, and supply chains of the Group.

5. Responsibilities & Raising Concern

All staff and business partners are expected to uphold the principles of this Policy and ensure that modern slavery or human trafficking does not occur within the Group's operations or supply chains.

All personnel are responsible for:

- Conducting business ethically and lawfully;
- Treating workers with dignity and respect;
- Remaining alert to indicators of exploitation or forced labour;
- Promptly reporting suspected violations of this Policy.

Concerns relating to modern slavery or human trafficking may be raised through:

- Supervisors or management;
- Human Resources;
- Compliance or Internal Audit units;
- Approved whistleblowing or reporting channels.

Reports made in good faith shall be treated confidentially and without retaliation.

6. Our Procedure

AKULAND GROUP shall take reasonable steps to prevent and identify risks of modern slavery and human trafficking by:

- Conducting due diligence on suppliers, contractors, and business partners;
- Promoting fair recruitment and employment practices;
- Ensuring employees work voluntarily and are free to leave employment in accordance with applicable laws;
- Prohibiting the retention of employee identity documents or unlawful wage deductions;

- Monitoring supply chain activities where necessary;
- Providing awareness and training on modern slavery risks and reporting obligations.

The Group shall not knowingly engage with any organisation or individual involved in modern slavery or human trafficking practices.

7. Actions the Company Will Take

Where instances or risks of modern slavery or human trafficking are identified, the Company may take appropriate actions, including:

- Conducting investigations into reported concerns;
- Taking disciplinary action against employees involved in violations;
- Suspending or terminating relationships with suppliers or contractors engaged in unethical practices;
- Reporting violations to appropriate authorities where required by law;
- Implementing corrective measures to prevent recurrence.

The Company reserves the right to take all necessary steps to protect affected individuals and uphold ethical business standards.

8. Monitoring

AKULAND GROUP shall periodically review and monitor the effectiveness of this Policy and related procedures to ensure continued compliance with applicable laws and best practices.

Monitoring activities may include:

- Internal reviews and audits;
- Supplier assessments and due diligence;
- Employee training and awareness programmes;
- Review of reported incidents and corrective actions.

This Policy shall be reviewed periodically and updated where necessary to strengthen the Group's commitment to preventing modern slavery and human trafficking.

Approved By: Board of Directors – Akuland Group