

UK MODERN SLAVERY ACT STATEMENT (SECTION 54)

INTRODUCTION

THIS SECTION 54 MODERN SLAVERY ACT STATEMENT (the “**Statement**”) is made by TestingXperts Limited, together with its subsidiaries and affiliates (collectively “**TestingXperts**”), pursuant to Section 54 of the Modern Slavery Act 2015 (United Kingdom) (the “**Act**”) and any other applicable modern slavery laws or regulations. This Statement sets out the steps taken by TestingXperts during the financial year 2025–2026 to seek to ensure that modern slavery and human trafficking do not take place within its business or supply chain.

In this context, TestingXperts is committed to conducting its business with the highest standards of ethical conduct and integrity and to maintaining effective systems and controls designed to prevent modern slavery and human trafficking across its operations and supply chains.

As TestingXperts satisfies the applicable criteria under Section 54, including the relevant annual turnover threshold, it is required to publish this Statement annually. Accordingly, this Statement reflects TestingXperts’ ongoing approach to identifying, addressing, and mitigating modern slavery risks in its business and supply chain relationships.

Further, TestingXperts continues to monitor relevant legal and regulatory developments, including any proposed amendments to the Act, and will update its practices and this Statement, as appropriate, in line with future regulatory requirements or applicable government guidance.

OUR BUSINESS AND SUPPLY CHAINS

TestingXperts is a global provider of Quality Assurance (QA) testing and digital services, including software testing, digital transformation, and IT consulting. In support of its business operations and service delivery, TestingXperts engages a range of suppliers and business partners for the provision of goods and services necessary to its operations. TestingXperts recognizes that certain parts of its supply chain may present a comparatively higher risk of modern slavery and human trafficking, depending on the nature of the goods or services provided, the workforce model involved, and the jurisdictions in which such suppliers operate. Accordingly, TestingXperts adopts a risk-based and proportionate approach to the oversight of its supply chain relationships.

For the purposes of internal assessment and oversight, TestingXperts broadly classifies its suppliers into the following categories:

- ❖ **Workforce and Staffing Providers:** suppliers that provide personnel or workforce support for TestingXperts’ business operations and service delivery requirements.
- ❖ **Service Providers:** partners that provide operational and support services, such as catering, food and beverage services, transportation, construction, and similar business support services for TestingXperts’ offices and facilities.
- ❖ **Product and Technology Providers:** partners that supply products and business-use materials to TestingXperts, including IT hardware, software, electrical and electronic equipment, furniture, heavy equipment, stationery, and similar items.

OUR POLICIES

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

- (i) **Labour Standards Policy:** This policy underlines our zero-tolerance approach to modern slavery and human trafficking. It applies to all people 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.

- (ii) **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 the 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:

It requires suppliers and where appropriate their subcontractors to refrain from the use of forced, bonded, or involuntary labor, child labor, human trafficking, retention of identity documents, coercive recruitment practices, and unlawful recruitment fees and to maintain lawful working conditions and wage practices in accordance with applicable law. In pursuance to this, we incorporate the following practices:

- a. During onboarding, our suppliers are required to sign the Supplier Code of Conduct (SCOC).
 - b. 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. TestingXperts expects relevant suppliers to implement equivalent standards within their own supply chains and reserves the right, where contractually agreed and proportionate to risk, to seek supporting information, remedial action, or other reasonable assurance regarding compliance.
 - c. We build long-standing relationships with local suppliers and make clear our expectations of business behavior.
 - d. 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 TestingXperts' business.
 - e. 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 TestingXperts 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.
- (iii) **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. TestingXperts prohibits retaliation against any person who raises a concern in good faith regarding suspected modern slavery, human trafficking, forced labour or related misconduct.
- (iv) **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. Where TestingXperts identifies an actual or potential breach of its anti-slavery expectations, it may, depending on the circumstances, require further information, implement enhanced monitoring, seek corrective action within a specified timeframe, suspend onboarding or

engagement, or terminate the relevant supplier relationship in accordance with applicable contractual rights. Additionally, TestingXperts undertakes:

- (i) **Risk Assessments:** TestingXperts 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 Act are met.
- (ii) **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.
- (iii) **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. Such training is delivered, as relevant, to personnel involved in procurement, supplier management, human resources, legal, compliance, and business operations, and is periodically reviewed to support awareness of modern slavery risk indicators and reporting channels.

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:

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

These indicators are used by TestingXperts as internal measures to assess the effectiveness of its anti-slavery programme and to identify areas for further enhancement and may evolve over time as the programme matures. 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.

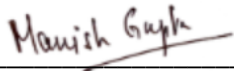
STATEMENT ACCESSIBILITY

This Statement is published on our company website with a prominent link available on the homepage to ensure public accessibility and transparency. TestingXperts may also publish or submit this Statement, or relevant details concerning it, to the UK Government's modern slavery statement registry or any successor reporting platform, where appropriate.

CONCLUSION

TestingXperts is steadfast in our commitment to preventing modern slavery and human trafficking in all aspects of our business and supply chains. This Statement was approved by the Board of Directors of TestingXperts Limited and is signed on its behalf by Manish Gupta, Director. It will be reviewed and updated annually to reflect our ongoing efforts and commitment.

Signature:



Manish Gupta

Designation: Director

Company Name: TestingXperts Limited

Date: April 10, 2026