

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 (the "Act") by N Sethia Group Limited ("NSGL"). NSGL recognises that we have a responsibility to take a robust approach to slavery and human trafficking ("Modern Slavery"). It sets out that NSGL is committed to improving practices to combat and tackle Modern Slavery and human trafficking in its business and supply chains.

1. ORGANISATION STRUCTURE AND BUSINESS

NSGL is a parent company incorporated in England & Wales, and is ultimately owned by Mr Nirmal Kumar Sethia and family settlement trusts. NSGL has subsidiaries in India, Norway, UK, Mauritius and BVI. The main activities of the group include:-

- manufacture and sale of security inks
- tea packaging, distribution and sale of tea under the brand Newby
- consultancy service
- trading in commodities and goods, commodity futures, shares, currencies and exporting
- property development, trading and investment

2. POLICIES, DUE DILIGENCE AND RISK ASSESMENT IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

NSGL does not knowingly enter into business with any other organisation, in the United Kingdom or abroad, which supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

As a conglomerate, although we have evaluated the risk of slavery and human trafficking from occurring within our supply chain as low, as part of our ongoing commitment to highest ethical standards we envisage the following ways in which NSGL can further mitigate any risk-

- Undertake ongoing risk assessments to identify areas of potential vulnerability within our operations and supply chains.
- Assess suppliers against geographic, sectoral, and product-related risks. Require all employees at NSGL to complete Code of Conduct training on periodic basis.
- Deliver exceptional service to our customers by building long-lasting relationships based on trust and understanding, and the same approach applies to our relationships with suppliers.
- Operate a whistleblower procedure throughout our employees, workers, both temporary and permanent, contractors and supply chain to report any violation without any fear.

3. OUR SUPPLY CHAIN

We recognise that risks of modern slavery and human trafficking may be more prevalent in certain regions and sectors, and we are committed to working closely with our suppliers to identify, assess, and mitigate those risks. Any member of our supply chain found to be

indulging in irresponsible, unfair and unethical business practices will be condemned and appropriate action will be taken against them.

4. FUTURE STEPS

We want all our group subsidiaries and associates to comply with the Modern Slavery Act 2015 at all times. It is our goal to ensure that we can rollout efficient policies in the future by making changes or new amendments as may be needed for better governance under the Modern Slavery Act 2015.

During 2025 a steering committee will be created to monitor the effectiveness of our policies relating to the Modern Slavery Act 2015 across NSGL, this committee will develop a risk assessment and reporting function plus present its findings to the board of directors on an annual basis, assisting in the refining and improvement of this policy statement ongoing.

5. TRAINING ABOUT MODERN SLAVERY

We aim to provide training to employees and key stakeholders to help them identify signs of modern slavery and understand how to respond. Training will be made mandatory for procurement, HR, and supply chain teams.

6. GOALS & KPIs TO MEASURE THE EFFECTIVENESS OF THE ACTIONS

We measure the effectiveness of our efforts by:

- Creating and monitoring supplier code of conduct
- Recording and investigating reports of concerns
- Reviewing internal KPIs related to ethical sourcing and audit results
- Engaging with third-party auditors and consultants to strengthen NSGL's commitment towards ethical sourcing and overall business
- Assess the knowledge of employees through surveys & feedback.
- Prepare Code of conduct training for all employees of NGL on periodic basis.




Amrao Jain
Director

Date: 21 August 2025