Certified B Corporation

THE KING'S AWARDS FOR ENTERPRISE 2024 PROMOTING OPPORTUNITY

STATEMENT AGAINST MODERN SLAVERY

SPARTA GLOBAL

WORLD LEADING AI, TECH & EDUCATION SERVICES

At Sparta Global Limited, we are committed to upholding equality in the workplace as a B Corporation. We believe that being a responsible corporate citizen is not only morally right but also essential for the long-term sustainability of our business.

We are dedicated to preventing any form of modern slavery or human trafficking within our organisation and supply chain. We firmly believe that employment should be a voluntary choice, and we prohibit any form of forced, bonded, or involuntary prison labor. Our suppliers are not allowed to require their employees to submit money or identity papers as a condition of employment, and employees must be free to leave their jobs after giving reasonable notice.

To ensure that our employees receive the necessary support and development opportunities, our Chief People and Compliance Officer provide constant assistance to all staff and trainees at Sparta Global. We place a high emphasis on promoting human rights within our business and ensuring that our employees are happy and content in their work environment. We encourage regular catchups and suggestions through our company portal on how we can further strengthen our measures to protect our employees' rights and company benefits.

We hold our suppliers, business partners, and all stakeholders to the same high standards that we hold ourselves. We operate a safe and ethical business that extends beyond Sparta Global. Our code of conduct outlines the guiding principles and values that govern our ethical decision-making in conducting our business.

We have established channels for employees to report concerns or breaches of our policies, including local reporting mechanisms and internal whistleblowing procedures. We are committed to protecting employees who disclose any malpractice, and all employees are provided with clear contracts of employment that comply with local legislation. This ensures a smooth onboarding process and enables employees to raise any queries or concerns before joining our team.

At Sparta Global, we have a zero-tolerance policy towards modern slavery, and we hold all employees accountable for compliance with this policy.

We conduct verification and risk assessments of our supply chain based on international indices, supplier performance, and other indicators, and we require our suppliers to comply with all applicable laws.

Our commitment to combating modern slavery is also reflected in our training programs, where we provide regular updates and necessary training on our code of conduct in relation to modern slavery and human trafficking. We expect all employees across our subsidiaries to comply with all laws, act with integrity and honesty, and adhere to local guidelines and regulations.

As a B Corporation, we are proud of our dedication to social and environmental responsibility, and we will continue to strive for excellence in upholding human rights and ethical business practices, including our unwavering stance against modern slavery.

In adherence to the Modern Slavery Act, we have taken and continue to take the following steps:

SUPPLY CHAIN

Although our supply chain is not complex, we work with various suppliers who provide services in different categories such as cyber security, IT, telecoms, technology sales, data analytics, and other areas as listed on our company website. We maintain respectful relationships with our suppliers, which allows us to have a clear understanding and visibility of our supply chain.

Due to the strong relationships and robust due diligence processes, we have in place with our suppliers, as well as our employees (referred to as Spartans), we consider the risk of exploitation, human trafficking, and breach of human rights to be very low. Nevertheless, we are committed to ensuring that such occurrences do not take place within our business or supply chain through our established procedures and due diligence.

CONTRACTS

Our contracts with suppliers include a provision that warrants they have not and will not engage in any activity, practice, or conduct that would constitute an offense under the Modern Slavery Act 2015.

POLICIES

All employees at Sparta Global have access to channels through which they can communicate concerns, including local reporting mechanisms and internal whistleblowing procedures, which encourage staff to report any instances of misconduct or policy breaches. We take such disclosures of malpractice seriously and are committed to protecting our employees. All employees are provided with a clear employment contract that complies with local legislation before joining Sparta Global, giving them the opportunity to review our company policies and raise any questions prior to starting, which facilitates a smooth onboarding process for all parties.

Sparta Global maintains a zero-tolerance policy on modern slavery and is unwavering in our commitment to the highest ethical standards. All employees are expected to comply with and understand this policy. The prevention, detection, and reporting of modern slavery and human trafficking within our business or supply chain are the responsibility of all employees at Sparta Global, and we encourage them to avoid any behavior that would suggest a breach of this policy.

VERIFICATION AND RISK ASSESSMENT

Sparta Global conducts a due diligence process to assess supply chain risks based on international indices, supplier performance, and other indicators of suppliers and contractors, supported by an audit process. Our standard supplier contracts include provisions for compliance with applicable laws.

AUDITS

We verify conformance with our Code of Conduct and provide assurance through our supplier audit process, which includes a demonstration from suppliers that appropriate policies, procedures and controls are in place to identify, prevent and address the risks of modern slavery and human trafficking within their operations and supply chains.

This statement has been approved by the Board of Directors

Purnima Sen

PURNIMA SEN
CHIEF OPERATIONS OFFICER

Date Signed: **16th July 2026**

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