

# MODERN SLAVERY STATEMENT

## 1. Overview and Commitment

This statement outlines the measures adopted by Pixcom Energy LLC to combat and prevent modern slavery and human trafficking within our business operations and throughout our supply chain. We acknowledge our corporate responsibility to act proactively, with transparency and robustness, in identifying and mitigating any risks associated with modern slavery.

Pixcom Energy LLC maintains a strict zero-tolerance approach to modern slavery, human trafficking, and all forms of forced labour. We are resolute in ensuring that such practices do not exist anywhere in our organisation or among our business partners. This is achieved through rigorous due diligence, continuous supplier engagement, the promotion of ethical standards, and targeted employee training.

## 2. Our Operations and Supply Chain

Pixcom Energy LLC specialises in the design, supply, and installation of IT/OT and Telecommunications Systems and related technologies. Our primary clients include the Utility, Energy, and Smart City organisations, operating directly or via main contractors, with significant operations based in the UAE. We source materials, components, and services to support our critical infrastructure projects.

Our procurement activities cover:

- Technical equipment, components, and specialist commodities
- Contracted engineering and technical services for project delivery
- Contingent and skilled labour across various domains

We recognise that while we strive to use long-term, trusted suppliers, the global and complex nature of technology and infrastructure supply chains carries inherent risks. Our sustainability and ethical procurement strategies are designed to enforce fair payment, equitable terms, and safeguard against exploitative labour practices.

## 3. Ethical Framework and Policies

Our internal governance reflects our zero-tolerance stance and underpins our ethical business framework. Key policies include:



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Office 33, 6th Floor, Liwa Street,  
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Abu Dhabi - UAE  
P.O Box - 25158

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CO6, IMPZ, Dubai Production City  
Dubai - UAE  
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Building 173,  
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- **Anti-Slavery and Human Trafficking Policy:** Defines our complete prohibition of modern slavery and outlines the protocols for investigating and resolving suspected violations.
- **Supplier Code of Conduct:** Sets out our expectations for labour standards, human rights, and ethical business conduct, aligned with international best practices, which all our suppliers are required to follow.
- **Whistleblowing / Speak Up Policy:** Establishes a secure, confidential channel for employees, contractors, and partners to report any ethical concerns, including potential modern slavery issues, without fear of retaliation.
- **Fair Payment Practices:** Ensures that our payment terms to suppliers are fair and prompt, reducing the financial pressures that can lead to labour exploitation further down the supply chain.

These policies are embedded into our supplier onboarding processes and contractual agreements. Non-compliance by a supplier can lead to immediate corrective action or the termination of the business relationship.

#### 4. Risk Identification and Due Diligence

Pixcom Energy LLC systematically evaluates modern slavery risks by considering supplier geography, industry sector, and specific labour requirements. We pay particular attention to:

- International suppliers operating in jurisdictions with weaker labour protection laws.
- The extended supply chain for complex technology components.
- Third-party labour providers or agencies, especially where unskilled or manual labour may be deployed.
- To manage these risks, we have established comprehensive due diligence procedures:
  - **Pre-qualification:** All new suppliers undergo an evaluation of their ethical policies and modern slavery commitments before engagement.
  - **Internal Checks:** Ensuring absolute adherence to right-to-work and employment laws within our own workforce.
  - **Audits and Assurance:** Conducting regular assessments and audits (both remote and on-site) of our supply chain.
  - **Remediation Protocols:** Working closely with suppliers to enact corrective actions where necessary, whilst reserving the right to end relationships if violations remain unresolved.

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## 5. Reporting and Remediation

We actively encourage transparency and urge any stakeholder to speak up if they suspect malpractice. Our remediation approach is designed to be swift, effective, and victim centric. We are committed to collaborating with relevant authorities and stakeholders to investigate incidents and ensure that affected individuals are protected and supported throughout the process.

## 6. Training and Awareness

Pixcom Energy LLC believes that awareness is the first line of defence. We provide mandatory training on modern slavery and human trafficking to all new employees as part of their induction process.

Furthermore, our procurement and management teams receive specialised training to help them identify warning signs within supply chains and enforce our due diligence procedures effectively.

## 7. Continuous Improvement and Monitoring

We continuously monitor the effectiveness of our anti-slavery measures through key performance indicators (KPIs) and regular management reviews. We are dedicated to continually refining our approach, enhancing supply chain transparency, and updating our risk assessment methodologies to stay ahead of emerging threats.

## 8. Approval

This statement is made in accordance with relevant international modern slavery regulations including section 54(1) of the UK Modern Slavery Act 2015 and best practices and constitutes Pixcom Energy LLC's Modern Slavery Statement, the same has been approved by the board.

**Thanseer Ahmed Ootikkal**

**Managing Director**



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