

# Environmental, Social and Governance (ESG) Policy

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## About the Policy

At Laiba Tech, we are committed to creating a positive, fair, and productive work environment that reflects our core values and company culture. We uphold high ethical standards, deliver exceptional results for our clients, and ensure integrity remains at the core of every operation. Shortcuts, corner-cutting, or any compromise in ethical behavior are not tolerated.

This Environmental, Social, and Governance (ESG) Policy reflects Laiba Tech's commitment to ethical business conduct, employee well-being, and responsible operations. By embedding sustainability, social responsibility, and sound governance into our strategy, we aim to create long-term value for employees, clients, stakeholders, and the communities we serve.

## Scope of the Policy

This policy applies to all employees of Laiba Technologies LLC. It also extends to staff working under a letter of authority, honorary contract, or work experience arrangement while undertaking duties on behalf of the company. Additionally, this policy applies to all third-party vendors, suppliers, and service providers working on behalf of Laiba Tech.

## ENVIRONMENTAL RESPONSIBILITY

Laiba Tech is dedicated to preserving the environment and employs sustainable practices to reduce its carbon footprint, ensuring our impact on the world is positive. We also expect compliance with all applicable environmental laws, regulations, and standards.

### Objectives:

- Minimize the environmental footprint of our operations.
- Promote energy efficiency and responsible resource use.
- Encourage sustainable procurement and waste reduction.
- Raise environmental awareness among employees and partners.
- Monitor our environmental impact and identify improvement opportunities.

## Energy Management

Laiba Tech has minimal reliance on physical office infrastructure. As a temporary recruitment and staffing company, its energy consumption is relatively low. However, the company acknowledges the importance of responsible energy use and supports efforts to promote energy efficiency across its operations.

Employees are encouraged to adopt simple energy-saving habits, such as powering down electronic devices when not in use and utilizing energy-efficient settings. The company's virtual work model also contributes to reduced energy consumption typically associated with daily commuting and onsite work environments.

### Targets:

- Achieve 100% employee participation in annual training on energy efficiency and sustainability practices by 2027.
- Conduct one energy efficiency awareness session per employee each year.

### Monitoring Mechanism:

- Maintain records of employee participation in training programs.

- Periodically review onboarding materials and internal communications to ensure energy-saving practices are consistently promoted.
- Collect and consider employee feedback on energy awareness initiatives.

## **Greenhouse Gas Emissions**

While Laiba Tech's business activities result in minimal direct GHG emissions, the company acknowledges its role in global climate action. It recognizes the importance of climate action and the responsibility of all businesses—regardless of size—to remain aware of their environmental impact.

Going forward, Laiba Tech remains committed to identifying potential sources of emissions, such as business travel or office energy use, and evaluating strategies for mitigation as needed.

### **Targets:**

- Conduct an internal review by 2027 to identify potential sources of GHG emissions and areas for future improvement.
- Ensure 100% of employees complete a basic awareness module on climate change and GHG emissions by 2027.
- Track and report estimated emissions per employee annually.

### **Monitoring Mechanism:**

- Maintain a record of internal environmental reviews and sustainability discussions.
- Record any identified emission sources and develop a list of potential reduction strategies.
- Track employee completion rates of climate-related training modules through HR or LMS systems.
- Update this review periodically to reflect changes in operations or scale.

## **Waste Management**

Laiba Tech generates minimal waste due to the nature of its business operations, which are predominantly remote. With most employees working virtually and limited physical office infrastructure, the company's direct contribution to waste generation is low. Additionally, temporary recruits are assigned to client locations, where waste management practices are governed by the client's operational protocols—whether remote or onsite.

Despite the limited generation of waste, Laiba Tech remains committed to promoting sustainable practices and encouraging environmentally responsible behaviour among its employees. The company recognizes the broader importance of waste management and continues to explore ways to reduce waste and minimize its environmental footprint.

### **Targets:**

- Ensure 100% of employees participate in waste reduction and recycling programs by 2026.

### **Monitoring Mechanisms:**

- Provide regular training to employees on waste reduction, recycling, and responsible disposal practices.
- Maintain participation records for all training and awareness programs.
- Periodically assess employee awareness and engagement through internal feedback or knowledge checks.

## **Sustainable Procurement**

Laiba Tech integrates sustainability considerations into its procurement practices to support ethical, environmental, and socially responsible sourcing. While the company's direct procurement needs are limited due to the nature of its operations, it recognizes the role of responsible sourcing in driving broader sustainability outcomes. Suppliers, vendors, and service providers are expected to align with Laiba Tech's sustainability values and meet minimum expectations related to ethical conduct, human rights, and environmental responsibility.

The company encourages the selection of suppliers who demonstrate commitment to sustainability through their policies, practices, and certifications. Procurement teams are guided by principles of transparency, fairness, and continuous improvement.

For a detailed overview, refer to the Sustainable Procurement Policy.

### **Targets:**

- Ensure 100% of new supplier contracts include ESG-related criteria by 2026.
- Provide sustainability training to 100% of the procurement team by 2027.

### **Monitoring Mechanisms:**

- Keep a record of supplier checks by including ESG requirements in their contracts.
- Monitor how many team members from the Procurement team complete ESG training.
- Regularly check if suppliers are meeting your sustainability standards.

For a comprehensive understanding of the company's approach to responsible sourcing, including expectations from suppliers, sustainability principles, assessment mechanisms, and oversight—please refer to the Sustainable Procurement Policy. This policy outlines Laiba Tech's commitment to embedding environmental, social, and ethical considerations into procurement decisions and serves as a guiding framework for both internal teams and external partners involved in the procurement process.

## **SOCIAL MANAGEMENT**

Laiba Tech values people as the foundation of our organization. We are committed to fostering a work environment that prioritizes well-being, fairness, inclusiveness, and professional development. Our social policies are designed to support every employee, protect fundamental rights, and enhance long-term satisfaction and engagement.

### **Objectives:**

- Promote health, safety, and well-being across all work environments.
- Support employee growth, fair treatment, and work-life balance.
- Embed diversity, equity, and inclusion at every level.
- Eliminate discrimination, harassment, and exploitative labour practices.
- Maintain open channels for employee feedback, grievances, and development.

## **Employee Health and Safety**

Laiba Tech prioritizes a safe, healthy, and respectful working environment for all employees, clients, and stakeholders. Consistent with the company's Core Values and Code of Ethics, efforts are made to uphold strong health and safety standards across all operations—both in virtual settings and at client locations where employees may be placed.

Even with a primarily remote workforce, the company ensures that all individuals are aware of safety expectations and understand their role in fostering a positive and secure workplace culture.

### **Policy Provisions:**

#### **Reporting Health and Safety Concerns**

- All Laiba Tech employees are expected to remain vigilant and proactive in maintaining a safe working environment.
- Any potential health and safety issues, hazards, or concerns must be reported immediately to a manager. Timely reporting helps safeguard the well-being of both the reporting associate and their colleagues.

#### **Workplace Conduct and Non-Violence**

- Laiba Tech maintains a zero-tolerance policy for any form of violence, threats, abuse, or retaliation in the workplace. This includes both verbal and physical aggression, such as intimidation, bullying, and explicit or implicit threats.
- All employees are expected to always treat one another with professionalism and respect. Any form of threatening behavior is strictly prohibited.
- In the event of any incident involving violence, intimidation, abuse, or threats, the matter must be reported immediately to a manager. In situations of immediate danger, local authorities should be contacted first.

#### **Drug and Alcohol Policy**

1. To support a safe and productive work environment, the use, sale, purchase, or possession of illegal drugs—and the misuse of alcohol or prescription medications—on company property or while conducting company business is strictly prohibited. Such conduct endangers Laiba Tech's employees, clients, and operations.
2. Managers or talent managers should be informed if an associate's job performance appears to be impaired due to substance use, or if illegal substances are observed on company or client premises.
3. All business activities must be carried out in compliance with applicable permits, legal approvals, and regulatory requirements.

#### **Target:**

- Achieve 100% incident reporting rate by 2028.
- Ensure zero reported incidents of workplace violence, intimidation, or abuse by 2029.
- Train 100% of employees on respectful workplace behavior by 2027.
- Maintain zero tolerance and zero incidents related to the use of drugs or alcohol during working hours.
- Train 100% of employees each year on the dangers and consequences of drug and alcohol use in the workplace.

#### **Monitoring Mechanism:**

- Require immediate reporting of health and safety concerns to designated managers.
- Enforce prompt action upon reports of violent or inappropriate conduct.
- Include safety- and conduct-related questions in exit interviews to identify potential issues.



- Conduct short, anonymous employee surveys once or twice a year to evaluate perceptions of safety and gather suggestions.

Laiba Tech maintains a strong focus on ensuring a work environment that is free from threats, violence, and substance abuse. This approach to employee health and safety applies across all operational settings, including client locations where employees may be placed. All employees, contractors, consultants, and any individuals working under the company's direction are expected to uphold the standards outlined in this policy and report any concerns without delay to help protect their own well-being and that of their colleagues. By adhering to these principles, Laiba Tech fosters a safe, respectful, and productive workplace for both its employees and clients.

## **Workplace Culture and Practices**

Laiba Tech fosters a positive and supportive work environment that promotes employee well-being, work-life balance, and fair labor practices. The company ensures a safe, inclusive, and respectful atmosphere across all operational settings, including remote work environments and client locations. All working conditions comply with relevant local laws and labor standards, and efforts are made to go beyond minimum requirements where feasible.

### **Work-Life Balance**

Laiba Tech supports flexible work arrangements, including remote work options, to help employees maintain a healthy balance between professional responsibilities and personal commitments. The company recognizes the value of personal time and encourages practices that prevent burnout and support overall mental and physical health. To support psychological well-being, Laiba Tech shares stress management tips, provides wellness-related resources, and encourages regular check-ins with team leaders to help maintain work-life balance.

### **Working Environment**

The company is committed to providing a safe, clean, and harassment-free workplace at all locations. Inclusivity is a core principle, and every effort is made to foster an environment of respect, equity, and non-discrimination. Healthcare coverage is provided through medical insurance to support employee well-being.

### **Work Hours**

Laiba Tech ensures employees are aware of their standard work hours and promotes the right to disconnect after hours, especially for those in virtual or hybrid roles. All managers are trained to monitor workloads and distribute responsibilities fairly to avoid excessive working hours. A system of weekly timesheet reviews ensures that no employee consistently works beyond scheduled hours without reason.

### **Fair Compensation**

The company provides competitive compensation aligned with industry benchmarks and ensures that payments are made accurately and on time. Annual reviews are conducted to maintain market relevance and reward employee contributions appropriately. Employees are compensated at 1.5 times their standard hourly rate for any additional hours worked beyond regular working hours, provided the client has requested and approved of the extra hours. This policy aligns with fair labor practices and applies to work undertaken on weekends, public holidays, and after regular working hours.

### **Leave Policy**

Laiba Tech recognizes the importance of adequate rest and personal time for all employees and provides a range of leave options to support their well-being and work-life balance. The company encourages employees to utilize their entitled leave in a timely manner to maintain productivity, manage personal responsibilities, and support overall mental

and physical health. Leave entitlements are clearly defined and accessible through the company's HR systems, with guidelines in place to ensure fair and consistent application across all teams.

If an employee is required to work on a weekend or public holiday for business purposes, they will be eligible for compensatory leave, which must be applied for within two months of the date of work. A variety of leave options are available, including sick leave, paternity leave, maternity leave, annual leave, and festival leave, in accordance with company policy and local regulations.

**Targets:**

- Ensure flexible work options are available for at least 70-80% of employees by 2028.
- Conduct annual reviews of compensation packages to remain competitive with industry standards.
- Conduct one feedback survey per year to assess employee well-being.

**Monitoring Mechanism:**

- Track and review flexible work arrangement requests and ensure timely implementation.
- Conduct periodic workplace assessments to ensure all working environments are safe, clean, and secure.
- Monitor leave applications to ensure they are processed efficiently and in compliance with this policy.
- Evaluate the effectiveness of remote work setups and confirm employees have adequate support and tools.

Laiba Tech continues to uphold high standards in working conditions, striving to create a workplace that values health, fairness, and inclusiveness. These policies and monitoring mechanisms are designed to evolve with employee needs while ensuring compliance with applicable laws and best practices.

## **Professional Development and Training**

Laiba Tech prioritizes employee growth by offering structured opportunities for skill enhancement, knowledge acquisition, and career progression. These initiatives are aligned with the company's broader organizational objectives, ensuring that all employees have access to relevant training and development resources that support both professional and personal growth.

### **Training and Development Programs**

The company organizes comprehensive training programs aimed at strengthening technical skills and promoting personal development. These include practical, hands-on On-the-Job Training (OJT) opportunities that allow employees to gain relevant knowledge through real-world applications in their specific roles.

### **Performance Management**

Laiba Tech upholds principles of fairness and meritocracy in all performance-related decisions, including performance reviews, promotions, and career mobility. Opportunities for advancement are based solely on individual performance, qualifications, and merit, with no tolerance for discrimination of any kind. Clear promotion criteria are documented and communicated transparently to all employees. Advancement is based on performance reviews conducted by at least two managers to ensure objectivity and prevent bias.

### **Recruitment and Selection**

The recruitment process is designed to attract qualified candidates who align with Laiba Tech's values and strategic goals. All hiring practices are merit-based and reflect the company's commitment to diversity, equity, and inclusion. Recruitment methods include internal postings, external hiring channels, and employee referral programs. To ensure equal opportunity from the outset, Laiba Tech uses standardized, role-relevant evaluation rubrics and interview questions during recruitment to avoid unconscious bias. Diverse representation on hiring panels is prioritized.

**Employees' Responsibilities:**

Employees are encouraged to take ownership of their growth by:

- Actively participating in training and development opportunities.
- Applying acquired knowledge and skills to daily responsibilities.
- Seeking out opportunities for self-improvement and career advancement.
- Providing constructive feedback on training initiatives.

For comprehensive guidance on recruitment procedures, employee induction, and integration practices, refer to the Onboarding Policy.

**Targets:**

- Ensure 100% of employees receive at least 10 hours of training per year by 2028.
- Conduct career development planning sessions for at least 50% of employees by 2029.

**Monitoring Mechanism:**

- Track employee participation in training and development programs every six months.
- Review internal promotion rates and employee career progression annually.
- Conduct follow-ups to monitor individual progress in development programs.
- Collect and analyze feedback from employees to improve training content and delivery.

Through structured development and fair recruitment practices, Laiba Tech ensures that employees have ample opportunities to grow while continuing to attract and retain talent that aligns with the company's values and long-term vision.

**Human Rights**

Laiba Tech upholds the fundamental rights and dignity of every individual associated with its operations. The company fosters a workplace culture grounded in respect, fairness, and non-discrimination, where all employees are treated equally and provided with a safe and inclusive environment. Discrimination of any kind—whether based on race, gender, sexual orientation, religion, age, disability, or any other protected characteristic—is strictly prohibited.

Laiba Tech consistently works toward cultivating a positive and inclusive work environment that reflects its core values and code of ethics.

**Child Labor, Forced Labor and Human Trafficking**

Laiba Tech ensures that human rights are respected and protected across all global operations, including those of its partners and supply chain. The company complies with all applicable labor laws and international human rights standards, including those set forth by the International Labor Organization (ILO) and the United Nations Global Compact.

Laiba Tech has a zero-tolerance policy toward any form of child labor, forced labor, or human trafficking. The company does not engage with, support, or maintain relationships with any third party involved in such unethical practices. This stance is outlined in the company's Core Values and Code of Ethics under the section titled "Practicing Good Corporate Citizenship."



**Child Labor**

Laiba Tech strictly prohibits the employment of individuals below the legal minimum working age, in accordance with applicable local and international laws. No person under the age permitted by law shall be employed in any capacity, and robust measures are taken to ensure compliance throughout the company's operations and supply chain.

**Forced Labor**

No form of forced, bonded, indentured, prison, or military labor is permitted in any part of Laiba Tech's business. Employment relationships must be voluntary, and employees must have the freedom to terminate their employment without coercion. The company conducts due diligence to avoid engaging with any third parties known to participate in forced labor practices.

**Human Trafficking**

Laiba Tech enforces a strict zero-tolerance policy for human trafficking. The company will not support, engage in, or partner with any organization or individual involved in the trafficking of people for labor or exploitation. All operations are expected to comply with international conventions and laws prohibiting human trafficking, and any breach will result in the termination of business relationships and necessary legal action.

**Targets:**

- Ensure zero tolerance and zero incidence of child labor, forced labor, or human trafficking in any of Laiba Tech's operations or partnerships every year.
- Ensure 100% of employees receive training on basic human rights—including child labor, forced labor, and human trafficking—by 2027.

**Monitoring Mechanism:**

- Establish accessible and confidential reporting channels for employees to raise concerns or report any suspected violations of human rights.
- Conduct due diligence when engaging third parties, with clear criteria excluding vendors or partners involved in unethical labor practices.
- Take immediate corrective action in response to any verified violations, including disengagement from non-compliant third parties and formal investigation procedures.

Laiba Tech's human rights policy reflects a deep-rooted commitment to ethical practices, legal compliance, and the well-being of all individuals within its value chain. By upholding these standards, the company actively contributes to the global effort to eliminate exploitative labor practices and fosters a workplace that is safe, fair, and respectful for all.

**Diversity, Equity, and Inclusion**

Laiba Tech actively fosters a workplace that embraces diversity, promotes equity, and cultivates inclusion across all levels of the organization. The company recognizes that a diverse and inclusive environment enhances innovation, drives performance, and strengthens relationships with clients and stakeholders.

Equal opportunity is a core principle embedded in Laiba Tech's recruitment, development, and advancement practices. All individuals—regardless of race, gender, sexual orientation, religion, age, disability, or any other characteristic—are treated with fairness, dignity, and respect.

**Laiba Tech's Key Principles on Diversity, Equity, and Inclusion**

- All employees, job applicants, and candidates for temporary or permanent placements are treated fairly and equitably at every stage of employment or engagement.
- The company is committed to building a culture that values diverse perspectives, encourages personal and professional growth, and ensures equitable access to opportunities.

- An inclusive workplace is promoted where every individual feels respected, supported, and empowered to contribute meaningfully. Employees are encouraged to bring their authentic selves to work, knowing that their differences are valued.

**Targets:**

- Ensure 100% of employees participate in the annual DEI training by 2027.
- Achieve a 25% increase in female representation in leadership positions by 2029.
- Ensure at least 50% of hiring panels include diverse representation by 2028.

**Monitoring Mechanism:**

- Conduct anonymous employee surveys every six months to gather feedback on DEI efforts and identify areas for improvement.
- Track leadership diversity metrics, including the representation of underrepresented groups in managerial and executive roles.
- Maintain a clear, accessible, and confidential mechanism for employees and job candidates to report concerns related to discrimination or bias, with prompt and fair resolution processes.

Laiba Tech remains dedicated to advancing diversity, equity, and inclusion as an integral part of its organizational culture. These values not only support the well-being of employees but also contribute to the company's long-term success and social impact.

## **Discrimination and Harassment**

Laiba Tech upholds a workplace culture rooted in fairness, dignity, and mutual respect. The company values the unique backgrounds and contributions of each individual and is committed to ensuring that all employment-related decisions—including recruitment, hiring, training, promotions, compensation, and terminations—are made without bias or prejudice.

Discrimination or harassment of any kind is strictly prohibited, whether based on race, color, religion, gender, gender identity, age, national origin, sexual orientation, marital status, disability, veteran status, or any other characteristic protected by applicable law. Laiba Tech complies with all equal employment opportunity regulations and expects all employees to uphold these standards.

Additional guidance can be found in the Core Values and Code of Ethics document, under the section titled Discrimination and Harassment.

**Targets:**

- Maintain a 100% unbiased hiring process by continuing to implement fair, inclusive, and merit-based recruitment practices.
- Ensure the promotion process remains 100% transparent and free from bias by regularly reviewing and reinforcing equitable evaluation criteria.

**Monitoring Mechanism:**

- Conduct mandatory training sessions for all employees on diversity, equity, inclusion, and anti-discrimination practices.
- Maintain an anonymous and accessible reporting system for employees to raise concerns regarding discrimination, harassment, or unfair treatment.

- Ensure prompt and fair resolution of complaints, with the option to report directly to the Chief Compliance Officer or to [compliance@laibatechnology.com](mailto:compliance@laibatechnology.com).

## GOVERNANCE

Strong corporate governance is fundamental to Laiba Tech's ability to operate responsibly, maintain stakeholder trust, and ensure long-term success. The company maintains a clear governance framework that guides ethical behavior, ensures legal compliance, and promotes a culture of accountability across all levels of operation. All employees, contractors, consultants, and individuals working under Laiba Tech's direction are expected to act in accordance with the company's policies and codes, which promote transparency, integrity, and responsible decision-making.

### Objectives:

- Foster ethical business conduct and anti-corruption practices.
- Prevent conflicts of interest and fraud.
- Protect data privacy and IT systems.
- Ensure transparency in risk management and internal controls.
- Provide secure channels for reporting concerns and enforcing accountability.

## Anti-Bribery and Anti-Corruption

Laiba Tech enforces a zero-tolerance policy towards bribery and corruption in all forms. All Associates, including employees, contractors, and third-party representatives, must comply with applicable anti-corruption laws such as the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant local regulations.

Bribery is defined as the offering, promising, giving, requesting, or accepting anything of value with the intent to obtain or retain business or secure an improper advantage. This includes cash, gifts, favors, charitable or political contributions, entertainment, or any preferential benefit. The company prohibits the use of facilitation payments unless prior written approval is obtained from the Chief Legal Officer.

In instances where interactions with government officials are required, they must be handled with heightened caution and conducted with the utmost integrity, transparency, and strict compliance with all applicable anti-bribery and anti-corruption laws.

For complete guidance on Laiba Tech's approach to preventing corrupt practices, please refer to the Anti-Bribery Policy and the Core Values and Code of Ethics.

### Approval Procedures for Sensitive Transactions

To safeguard financial integrity and reduce risks, Laiba Tech requires prior approval for all sensitive or high-value transactions. Sensitive transactions include those involving large monetary amounts, contracts with government entities, cross-border operations, and the engagement of new vendors without a prior relationship.

- All such transactions must be approved by both the functional head and the Compliance Officer.
- In high-risk scenarios, an escalation to the Executive Management or Board of Directors may be required.
- Each approved transaction is logged and reviewed as part of quarterly internal audits.

### Gifts and Entertainment

Laiba Tech prohibits providing gifts to government officials under any circumstances. Entertainment offered to a government official must not exceed the value of \$20 without obtaining prior approval from the Chief Compliance Officer or can be reported to [compliance@laibatechnology.com](mailto:compliance@laibatechnology.com). All gifts and entertainment must be:

- Reasonable and appropriate,
- Compliant with applicable laws,
- Accurately recorded in the company's books,
- Free from any expectation of reciprocation or improper influence.

### **Conflict of Interest**

All employees, contractors, consultants, and individuals working under Laiba Tech's direction are expected to act in the best interests of the company and avoid situations that could compromise their objectivity or impair sound judgment. Conflicts may arise in relation to outside employment, financial investments, family relationships, or personal benefits.

Examples of conflicts include, but are not limited to:

- Holding a significant financial interest in a client or supplier,
- Participating in decisions that may benefit a friend or relative,
- Using Laiba's opportunities or assets for personal gain.

All potential conflicts must be disclosed to the Chief Compliance Officer or can be reported to [compliance@laibatechnology.com](mailto:compliance@laibatechnology.com). For detailed expectations, refer to the Core Values and Code of Ethics, section titled Avoiding Conflicts of Interest.

### **Fraud Prevention**

Laiba Tech prohibits all forms of fraud, including falsification of records, misrepresentation, embezzlement, or any attempt to gain personal or organizational benefit through deceptive practices.

The company maintains rigorous internal controls to detect and prevent fraudulent activities. All employees are required to act with honesty and to report any suspicions immediately.

Fraud-related conduct and associated disciplinary actions are outlined in the Misconduct & Disciplinary Action Policy.

### **Anti-Money Laundering (AML)**

Laiba Tech conducts business only with partners engaged in lawful activities and operating with funds from legitimate sources. The company prohibits any engagement in activities that may be used to disguise the origin of illicit funds.

Employees must conduct due diligence and report any suspicious transactions, especially those involving unusual payment methods, shell companies, or jurisdictions associated with secrecy or risk.

Detailed guidance can be found in the Core Values and Code of Ethics section Prohibition Against Money Laundering.

### **Information Security**

The protection of confidential data and information systems is a top priority at Laiba Tech. The company's IT Security Policy defines the controls and responsibilities necessary to maintain data confidentiality, integrity, and availability.

Employees are required to:

- Use company systems in line with acceptable use policies,
- Report suspected breaches or vulnerabilities immediately,
- Protect client and company data from unauthorized access.

## **Business Continuity Management**

Laiba Tech has established a formal Business Continuity Policy to ensure uninterrupted service delivery and protection of stakeholder interests during potential disruptions, including natural disasters, cyber incidents, operational failures, or other emergencies. The policy forms the foundation of the company's Business Continuity Management System (BCMS), which is designed to ensure rapid response, recovery, and restoration of critical business operations.

Key components of the Business Continuity Policy include:

- Identification of essential business functions and assets.
- Risk assessment and business impact analysis.
- Development of continuity and recovery plans for critical functions.
- Assignment of roles and responsibilities to ensure timely execution.
- Communication protocols to keep clients, employees, and stakeholders informed during disruptions.
- Regular testing, simulation exercises, and post-incident reviews to improve preparedness and resilience.

The company is committed to continuously reviewing and enhancing its continuity plans to align with evolving risks and best practices.

For detailed procedures and scope, refer to the Business Continuity Policy.

## **Incident Response Policy**

Laiba Tech has implemented a robust Incident Response Policy to manage information security incidents and operational threats with speed, consistency, and minimal disruption. The policy ensures that any suspected or actual breach—whether technical, procedural, or human in origin—is handled through a clearly defined response structure.

The Incident Response process includes:

- Timely identification and classification of incidents based on severity and impact.
- Immediate containment and mitigation to prevent further damage.
- Internal escalation protocols to involve designated response teams and management.
- Root cause analysis and documentation of the event.
- Corrective actions and recommendations for future prevention.
- Communication to stakeholders (internal and external), where required, based on the sensitivity of the incident.

All employees and contractors are required to report security incidents without delay. The company uses monitoring tools, training, and response drills to ensure readiness and compliance.

For comprehensive details on reporting, escalation, and corrective action plans, refer to the Incident Response Policy.

### **Targets:**

- Ensure 100% of employees complete mandatory anti-bribery and anti-corruption training within the first year of employment or engagement.
- Conduct annual declarations of interest for employees in sensitive roles and review all disclosures to ensure transparency in decision-making.
- Maintain zero tolerance for confirmed instances of fraud across all operations.
- Ensure that all client due diligence procedures are conducted before engagement, with 100% of relevant employees trained on AML basics by 2027.

- Ensure 100% of employees undergo information security awareness training annually.
- Achieve 100% employee acknowledgment of core governance policies (Anti-Bribery, Code of Ethics, Conflict of Interest, Misconduct) within 30 days of onboarding.

#### **Monitoring Mechanism:**

- Maintain a centralized log of training completion, policy acknowledgments, and signed declarations for all governance-related policies.
- Provide confidential and accessible reporting mechanisms for employees to raise concerns about misconduct, fraud, bribery, or unethical behavior. All reports are to be investigated in accordance with the Misconduct & Disciplinary Action Policy.
- Conduct periodic internal audits to review compliance with governance policies, assess control effectiveness, and detect any non-compliance or risk areas.
- Require pre-approval for government-related entertainment exceeding the defined threshold and maintain logs of all approved exceptions for audit review.
- Evaluate reported conflicts annually and implement mitigation actions where required, with HR and compliance teams responsible for follow-up.
- Monitor and track all reported incidents related to information security, fraud, or regulatory breaches through the designated response protocols.

### **WHISTLEBLOWER PROTECTION**

Laiba Tech is committed to maintaining the highest standards of ethical conduct, transparency, and accountability in all areas of its operations. To uphold these principles, the company encourages all employees, contractors, and stakeholders to report any concerns regarding unethical behavior, violations of laws or regulations, or breaches of company policies. The purpose of this Whistleblower Protection section is to ensure that individuals who report such concerns in good faith can do so without fear of retaliation or adverse consequences.

#### **Intent**

The objectives of the Whistleblower Protection mechanism are to:

- Encourage the reporting of suspected misconduct.
- Ensure that all reported incidents are appropriately and thoroughly investigated.
- Protect whistleblowers from any form of retaliation.
- Foster a culture of transparency, integrity, and accountability throughout Laiba Tech.

#### **Reportable Issues**

Employees and stakeholders are encouraged to report concerns in the following areas (but are not limited to):

- **Violations of Laws or Regulations:**
  - Employment laws
  - Data privacy regulations
  - Workplace safety regulations

- Financial and reporting regulations
- **Fraudulent Practices:**
  - Resume or qualification misrepresentation
  - Timesheet manipulation or billing fraud
  - Misappropriation of funds or other fraudulent activities
- **Misuse of Company Resources:**
  - Theft or embezzlement
  - Unauthorized use of company property
  - Misuse or disclosure of confidential information
- **Discrimination and Harassment:**
  - Discrimination based on race, gender, age, religion, disability, or any other protected characteristic
  - Sexual harassment, workplace bullying, or any form of abusive behaviour
- **Health and Safety Violations:**
  - Unsafe working conditions
  - Failure to provide adequate safety training or equipment
- **Unethical Business Practices:**
  - Conflicts of interest
  - Bribery or kickbacks
  - Unfair hiring or promotion practices
  - Breach of client contracts
- **Information Security Concerns:**
  - Data breaches or unauthorized access to sensitive information
  - Weak or compromised security protocols
  - Negligence in maintaining cybersecurity standards

## Reporting Process

- **How to Report:**

Concerns may be reported through multiple channels:

  - Directly to the Human Resources Department.
  - To the Chief Compliance Officer or to [compliance@laibatechnology.com](mailto:compliance@laibatechnology.com).
  - Via the confidential anonymous reporting mechanism established by Laiba Tech.
- **Information to Include:**

To assist in a thorough investigation, whistleblowers should include:

  - A detailed description of the misconduct.
  - Names of individuals involved (if known).
  - Dates, times, and locations of the incidents.

- Any supporting evidence or documentation.
- Names of potential witnesses.

### **Anonymity, Confidentiality, and Non-Retaliation**

- **Anonymous Reporting:**  
While anonymous reports are accepted, Laiba Tech encourages individuals to identify themselves to facilitate a comprehensive investigation.
- **Confidentiality:**  
The identity of whistleblowers and the details of their reports will be kept strictly confidential, except when disclosure is required by law or is necessary for the investigation.
- **Non-Retaliation:**  
Laiba Tech strictly prohibits any form of retaliation against individuals who report concerns in good faith or participate in investigations. Retaliation includes, but is not limited to:
  - Termination or suspension.
  - Demotion or reduction in responsibilities.
  - Harassment, intimidation, or other abusive behaviour.
  - Unfavourable changes to job assignments, work conditions, or opportunities.
  - Denial of promotions, training, or benefits.

If an individual believes they have been subjected to retaliation, they must report the incident immediately to the Chief Compliance Officer or to [compliance@laibatechnology.com](mailto:compliance@laibatechnology.com). Laiba Tech will investigate all claims of retaliation and take appropriate corrective actions, which may include reassignment or paid leave during the investigation.

### **Investigation Process**

1. **Acknowledgement:**  
Upon submission of a complaint to the designated authority (using the prescribed complaint form and attaching all relevant documentation), the whistleblower will receive an acknowledgment of their report at the earliest opportunity (provided the report is not anonymous).
2. **Review and Assessment:**  
The designated authority will verify the identity of the whistleblower (if not anonymous) and ensure the report contains verifiable information. Only then will an investigator be appointed.
3. **Investigation:**  
The appointed investigator will conduct a thorough investigation within 45 days, which may include interviews, document reviews, and any other necessary steps to determine the facts.
4. **Outcome and Actions:**  
Once the investigation is complete, a detailed report including findings and recommendations for corrective or disciplinary actions will be submitted to the Reviewing Authority for closure or initiation of further proceedings.



## **GRIEVANCE REPORTING**

Laiba Tech is dedicated to ensuring a fair and supportive work environment. The Grievance Mechanism provides a structured process for employees and stakeholders to raise concerns or complaints about workplace issues or policy violations, ensuring that such grievances are addressed impartially and promptly.

### **Purpose**

The Grievance Mechanism is established to:

- Provide a formal process for addressing concerns related to workplace conditions, discrimination, harassment, and other policy breaches.
- Ensure that all grievances are investigated and resolved in a fair, transparent, and timely manner.
- Reinforce a culture of trust and open communication within the organization.
- Uphold the rights and well-being of all employees and stakeholders.

### **Scope**

This mechanism applies to all Laiba Tech employees, contractors, temporary staff, and other stakeholders, including vendors and clients, who believe that their rights have been violated or that there is a breach of company policies or ethical standards.

### **Types of Grievances Covered**

Grievances may relate to, but are not limited to:

- **Workplace Conduct:** Discrimination, harassment, or bullying; any form of mistreatment or abuse.
- **Health and Safety:** Unsafe working conditions or inadequate safety measures.
- **Employment Practices:** Unfair treatment in hiring, promotions, compensation, or work assignments.
- **Policy Violations:** Breaches of the company's Code of Ethics, human rights policies, or ESG commitments.
- **Other Concerns:** Any issue that negatively impacts the well-being or rights of individuals within the organization.

### **Reporting Procedure**

#### **1. Filing a Complaint:**

A grievance may be submitted:

- Directly to the employee's immediate supervisor or manager.
- To the Human Resources Department.
- Via an online grievance submission form, if available.

The complaint should include:

- A detailed description of the issue.

- Names of the individuals involved.
  - Dates, times, and locations of the incidents.
  - Any supporting evidence or documentation.
  - Names of any witnesses, if applicable.
2. **Acknowledgement:** Upon receiving the grievance, the designated authority will acknowledge receipt within 3–5 business days and inform the complainant of the next steps.
  3. **Investigation and Assessment:** A neutral investigator will be assigned to review the grievance. This process may include interviews, document review, and fact-finding measures. The investigation is conducted confidentially and objectively.
  4. **Resolution and Feedback:** Once the investigation is complete, the findings and any corrective actions will be communicated to the complainant. If the grievance is substantiated, appropriate remedial measures will be implemented, which may include disciplinary actions or policy changes.
  5. **Appeal Process:** If the complainant is dissatisfied with the outcome, they may appeal the decision. An appeal will be reviewed by a senior panel or designated authority to ensure fairness and thoroughness.

#### Grievance Handling Principles

- **Impartiality:** All grievances will be handled in a neutral and unbiased manner.
- **Confidentiality:** The identity of the complainant and all related details will be kept confidential, shared only with individuals directly involved in the investigation.
- **No Retaliation:** Employees raising grievances in good faith are protected against any form of retaliation. Any retaliation will be subject to disciplinary action.
- **Accessibility:** The grievance mechanism is easily accessible to all employees and stakeholders, ensuring that everyone has a safe space to voice their concerns.

#### Remediation Procedure

Laiba Tech is committed to addressing all verified incidents of misconduct, policy violations, or unethical behaviour with fairness, consistency, and accountability. When a grievance is substantiated or a policy breach is confirmed through investigation, the company follows a structured remediation process to resolve the issue and prevent its recurrence.

##### 1. Corrective Measures

- Immediate corrective actions are taken to stop the violation and mitigate its impact on affected parties and business operations.
- Individuals found responsible for the violation may be subject to disciplinary measures such as written warnings, mandatory training, suspension, or termination, based on the severity of the misconduct.
- In instances involving external stakeholders such as vendors or contractors, Laiba Tech may choose to end the business relationship or require demonstrable corrective action as a condition for continued engagement.

## **2. Support for Affected Parties**

- Individuals affected by the incident are provided access to appropriate support, including guidance from the Human Resources team or professional counselling services where necessary.
- In cases involving harassment, discrimination, or workplace-related distress, Laiba Tech may take additional steps such as altering reporting lines or implementing protective arrangements to safeguard the well-being of those involved.

## **3. Review of Policies and Systems**

- A root-cause analysis is conducted to identify underlying systemic issues contributing to the incident, such as policy gaps, insufficient controls, or cultural concerns.
- Based on the findings, Laiba Tech reviews and updates relevant internal policies, procedures, or training programs to reduce the risk of recurrence.

## **4. Monitoring and Follow-Up**

- A remediation plan is developed, outlining timelines, responsible parties, and expected outcomes. Progress is monitored by the Human Resources and Compliance teams.
- Senior management is kept informed of the status of remediation efforts and may commission additional oversight in cases of repeated non-compliance.
- Feedback from affected individuals is collected to evaluate the effectiveness of the response and ensure concerns have been addressed adequately.

This remediation framework enables Laiba Tech to address issues with integrity while improving internal processes, strengthening its workplace culture, and upholding the company's values and ESG commitments.

### **Monitoring and Oversight**

Laiba Tech shall maintain records of all grievances received, the status of investigations, and the resolutions achieved. Periodic reviews of grievance reports will be conducted by senior management to identify trends and make necessary policy adjustments. This oversight ensures continuous improvement in workplace practices and reinforces our commitment to a supportive work environment.

### **Business and ESG Integration**

Laiba Tech firmly believes that our true value lies in our people, communities, and the world at large. ESG principles are not an add-on—they are integral to our identity and operations. By taking a holistic approach that encompasses environmental stewardship, social responsibility, and robust governance, we create lasting value for all stakeholders. As awareness of ESG issues grows, Laiba Tech is uniquely positioned to share its story of positive impact and continuous improvement.

### **Commitment to Sustainable Development Goals (SDGs)**

Laiba Tech aligns its Environmental, Social, and Governance (ESG) strategy with key United Nations Sustainable Development Goals (SDGs) that resonate with the nature of its operations and long-term values. As a temporary staffing and recruitment company with a global outlook and a strong remote workforce model, Laiba Tech is committed to advancing the following SDGs:

- **SDG 5 – Gender Equality:** Laiba Tech promotes equal opportunity and fair treatment across its hiring, staffing, and internal management practices. The company supports diversity and inclusion in the workplace and ensures gender equality is reflected in recruitment, compensation, and career development.
- **SDG 8 – Decent Work and Economic Growth:** As a workforce enabler, Laiba Tech contributes to economic development by facilitating access to decent employment opportunities. The company upholds fair labour practices, ensures safe working conditions, and advocates for ethical conduct among its employees and placed personnel.
- **SDG 12 – Responsible Consumption and Production:** Laiba Tech encourages the efficient use of resources and minimizes operational waste, both in its physical office and remote setups. The company prioritizes digital processes and responsible procurement to reduce environmental impact.
- **SDG 13 – Climate Action:** Acknowledging the importance of environmental responsibility, Laiba Tech monitors its emissions—including those arising from homeworking—and seeks practical ways to reduce its carbon footprint. The company supports awareness and action on climate-related issues among its employees and stakeholders.
- **SDG 16 – Peace, Justice and Strong Institutions:** Laiba Tech maintains robust governance frameworks that uphold transparency, integrity, and ethical behaviour. The company enforces anti-bribery and anti-corruption policies and provides accessible grievance mechanisms to support fairness and accountability.

By integrating these SDGs into its ESG approach, Laiba Tech reinforces its commitment to building a sustainable, inclusive, and responsible business that contributes positively to society and the environment.

#### **Responsibility to Clients**

Our commitment extends beyond internal practices. Laiba Tech is dedicated to providing the best possible service to our clients by responding promptly to their needs and ensuring that our operations uphold the highest standards of sustainability and ethical conduct. Senior Management and the Board actively integrate ESG priorities into business decisions to ensure that every client interaction reflects our commitment to responsible and transparent practices. We strive to be a trusted partner—a company that clients are proud to work with and recommend.

#### **Breach of Policy**

Any breach of this ESG Policy by employees, management, or executives will be taken very seriously. Violations may lead to disciplinary action, up to and including termination for misconduct or gross misconduct. Furthermore, Laiba Tech reserves the right to terminate relationships with any individuals or organizations that fail to comply with our policies. This strict stance ensures that our commitment to sustainability, ethical behavior, and responsible governance is maintained without compromise.

#### **ESG Reporting and Disclosures**

Laiba Tech will annually disclose key ESG metrics in client reports and participate in voluntary assessments such as EcoVadis and SDG reporting. The company also intends to align future disclosures with globally recognized frameworks such as GRI (Global Reporting Initiative), SASB (Sustainability Accounting Standards Board), and IFRS S1/S2 where applicable.

Key ESG performance indicators will be tracked year-over-year and communicated transparently through stakeholder reports and ESG communications. These disclosures reflect Laiba Tech's commitment to transparency, continuous improvement, and client accountability.



### **Accountability and Commitment to ESG Principles**

All directors, managers, and employees share responsibility for the effective implementation and adherence to our ESG principles. Leadership is expected to champion these values, promote best practices, and drive continuous improvement across all areas of our Environmental, Social, and Governance efforts. The Executive Team and Board of Directors will periodically review these principles and policies to ensure they remain robust, relevant, and aligned with evolving global standards.

### **Monitoring and Enforcement**

Laiba Tech is proactive in preventing and addressing non-compliance with its ESG Policy. Any concerns or breaches—whether ethical, legal, or operational—must be reported immediately through our established channels, including whistleblowing mechanisms. Regular internal audits, performance reviews, and stakeholder feedback will be used to monitor adherence to our ESG commitments. Active participation at all levels of the organization is essential; every employee is expected to take ownership of these principles and contribute to a culture of transparency and accountability.

## **APPENDIX: ESG GLOSSARY**

**Greenhouse Gas (GHG) Emissions:** that trap heat in the Earth's atmosphere, contributing to global warming and climate change. Common GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). These emissions primarily come from human activities like burning fossil fuels, deforestation, and industrial processes.

**Energy Management:** Energy management is the process of monitoring, controlling, and optimizing the use of energy in a system or organization to improve efficiency, reduce waste, and lower costs. It involves strategies like energy conservation, resource allocation, and the use of renewable energy sources.

**Career Management & Training:** Career management and training focus on developing skills, setting career goals, and seeking opportunities for growth. It involves continuous learning and adapting to industry changes. The goal is to enhance job performance and career advancement.

**Working Conditions:** Working conditions refer to the environment, hours, safety, and overall atmosphere in which employees perform their tasks. It includes factors like physical workspace, equipment, workplace culture, and employee health and safety. Positive working conditions contribute to employee well-being and productivity.

**Employee Health & Safety:** Employee health and safety refers to the policies and practices that ensure a safe and healthy working environment. It includes preventing workplace hazards, providing safety training, and ensuring compliance with health regulations to protect employees from accidents, injuries, or illness.

**Diversity, Equity and Inclusion (DEI):** DEI refers to policies and practices designed to promote a diverse workforce, ensure fair treatment for all employees, and create an inclusive environment where everyone feels valued and respected.

**Diversity:** The presence of individuals from various backgrounds, perspectives, and identities.

**Equity:** Ensuring all employees have equal access to opportunities, regardless of their background.

**Inclusion:** Creating an environment where everyone feels welcomed, valued, and empowered to contribute.

**Child Labor, Forced Labor & Human Trafficking:** This refers to the commitment to prohibit child labour, forced labour, and human trafficking in the company's operations and supply chain. These practices violate human rights and are unethical and illegal.

**Business Ethics:** Business ethics refers to the moral principles and standards that guide behavior and decision-making in business. It involves practices such as honesty, fairness, transparency, and accountability in interactions with employees, customers, suppliers, and stakeholders.

**Anti-Bribery and Anti-Corruption:** A set of policies and practices aimed at preventing bribery, corruption, and unethical business behaviour. It includes prohibiting the offering, accepting, or soliciting of bribes or improper payments to gain business advantages or personal benefits.

**Bribe:** A bribe is any payment or Anything of Value offered or provided to improperly influence a decision-maker or to obtain an unfair business advantage.

**Corruption:** An act is corrupt if it is performed to secure an improper advantage, either by paying a bribe or through other means (for example, by paying a kickback or a payoff, or by laundering money).

**Information Security:** Refers to the practice of protecting sensitive information, including data, systems, and networks, from unauthorized access, disclosure, alteration, and destruction. This includes safeguarding the privacy and confidentiality of personal and corporate data.



**Money laundering:** It is the process of disguising the origins of illegally obtained money, typically by passing through a complex sequence of banking transfers or commercial transactions. The goal is to make the money appear legitimate and hide its criminal source.

**Government Official:** A Government Official is any individual acting in an official capacity for or on behalf of a Government Entity.

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