

UK Modern Slavery Act Annual Transparency Statement

For year ended December 31, 2023

I. Introduction

The Accely Ltd (“Accely”) is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chains. This statement is made on behalf of Accely pursuant to section 54 of the Modern Slavery Act 2015 of the United Kingdom (“Modern Slavery Act”).

At Accely, we have a long-standing culture of “Doing What’s Right,” as evidenced by our Employee Code of Conduct and Supplier Code of Conduct. These specific initiatives, coupled with our belief that transparency and accountability promote healthy, stable financial markets, are intended to help us achieve the highest of standards and continue to progress and evolve our social and ethical responsibilities.

II. Organizational Structure

Accely is a business services consulting firm that is an authorized reseller and implementation partner of SAP Suite. Accely is a Value-added reseller with the business practice around SAP offerings by selling, designing, implementing and supporting solutions end-to-end for the entire portfolio of its offering. Accely also specializes in SAP License sales and related Consulting services including discovery and evaluation, upgradation, implementation and rollout, migration, conversion, mobility, maintenance, support, digitization, integration and related services. Other services also including Magento, Odoo, Microsoft, LAMP (Linux, Apache, MySQL, PHP/Perl/Python) Technology, Salesforce, RPA Automation, Mobility, Cloud Services, MEAN stack and Digital Marketing including SEO and SMM. We are headquartered in the Singapore and operate our businesses in India, U.S., Canada, Egypt, Saudi Arabia, United Arab Emirates, United Kingdom. To find out more about the nature of our business, please access the various resources on the homepage of www.accely.com.

III. Governance and Policy

We are committed to acting ethically, with integrity and promoting work environments that engender conditions of freedom, equality, security and dignity. Accely expects its employees, contractors and suppliers to prevent acts of modern slavery and human trafficking from occurring within both its business and supply chains and has policies (including its Human Rights Statement) and codes of conduct (including the Employee Code of Conduct and the Supplier Code of Conduct) in place to establish standards expected across our business activities. Our governance framework and related corporate policies empower our employees and contractors to report and escalate any concerns of unethical conduct, whether relating to modern slavery, human trafficking or other matters.

As part of our continued commitment to responsible supply chain management and sustainable procurement, we require potential suppliers to provide information relating to their anti-modern slavery and human trafficking policies as part of Accely's Request for Proposal (RFP) process.

Accely's Supplier Code of Conduct applies to all vendors in our supply chain globally. It describes the expectations we have of our vendors to conduct business responsibly, including with respect to compliance with the requirements of applicable slavery, forced labor, child labor and human trafficking laws. The Supplier Code of Conduct describes Accely's commitments regarding social responsibility, health and safety, labor and human rights, ethics and other responsible business practices.

All vendors engaged in providing products and services to Accely are expected to act in accordance with the Supplier Code of Conduct, including by aligning their guidelines, policies and practices with the Supplier Code of Conduct and by communicating and enforcing its provisions throughout their organizations and supply chains. A violation of the Supplier Code of Conduct by a vendor may lead to review or termination of our relationship with such vendor.

Our Employee Code of Conduct and our policies on Whistleblowing, Escalation and Speaking Up, Reporting of Illegal or Unethical Conduct and Non Retaliation, and Suspicious Activity Reporting also empower our employees and contractors to report concerns in confidence without fear of retaliation.

IV. Risk Assessment

We have evaluated the nature and extent of our exposure to the risk of modern slavery and human trafficking in industries and geographies that we perceive to be of higher risk, including real estate, construction and facilities management. We will continue to assess the risks associated with our business and supply chain and expand the scope of our focus, as necessary.

V. Training

We acknowledge that educating our staff is fundamental to ensuring potential human rights and modern slavery risks are identified and managed. Accely's current on-boarding and refresher training for staff includes Accely's Code of Conduct, with specific focus on:

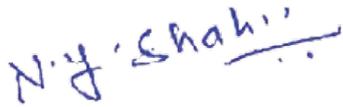
- conducting business in full compliance with all applicable laws and regulations, and in accordance with the highest ethical standards; and
- being willing to take a stand to correct or prevent any improper activity.

In addition, we train our global procurement team and select members of our legal, risk and compliance team on modern slavery and human trafficking, and on our role in identifying and managing the risk of such activities.

VI. Continuing Efforts and Commitment

We will continue to assess our practices and engage with our stakeholders, including vendors, to raise awareness and reduce the risk of modern slavery and human trafficking occurring in our organization and supply chain.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 of the United Kingdom and constitutes Accely's modern slavery and human trafficking transparency statement for the year ended December 31, 2023.

A handwritten signature in blue ink that reads "N. Shah" with a horizontal line underneath the name.

Nilesh Shah

CEO, Accely Ltd