MODERN SLAVERY AND HUMAN TRAFFICKING POLICY



1. Introduction

PERSOLKELLY Pte Ltd and its subsidiaries (individually and collectively referred as the "Company", "We" or "Us") have a zero-tolerance policy against all forms of modern slavery, human trafficking, and related activities. We support fundamental human rights for all people, and we expect our employees and other individual(s) or organisation(s) that are involved with our business to do the same so as to ensure that our employees can be productive and work comfortably. We are committed to complying with applicable modern slavery laws, statutes, regulations, and codes and to implementing and enforcing effective systems and controls to ensure no occurrence of modern slavery activities within the workplace. We are committed to investigate the risk of slavery and human trafficking occurring in any of our business activities and carrying out appropriate.

2. Scope

- 2.1 This policy applies to all individuals working for us or on our behalf in any capacity and organisations that we have business dealings with, including employees, officers, directors, agents, volunteers, interns, contractors, sub-contractors, clients, suppliers, and business partners.
- 2.2 This policy does not form part of any employee's contract of employment or the contract of any worker or self-employed contractor and we may amend it at any time.

3. What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery occurs when an individual is tricked, coerced, or forced to work whilst being exploited by others, for their personal or commercial gain. Modern slavery is governed by modern slavery laws. Modern slavery takes many forms, namely, slavery, servitude, forced labour and human trafficking. Example of these offences are including but are not limited to the following:

- Labour exploitation This involves forcing a person to work long hours for little or no pay in poor conditions under verbal or physical threats of violence to the person or the person's families.
- Domestic servitude This involves a victim being forced to work in predominantly private households, usually performing domestic chores and childcare duties. Their freedom may be restricted, and they may work long hours often for little or no pay, often sleeping where they work.

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They may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

- Forced criminality This can be understood as the exploitation of a person to commit crimes such
 as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking and other similar activities that
 are subject to penalties and imply financial gain for the trafficker.
- Sexual exploitation This includes but is not limited to sexual abuse and forced prostitution.
 Victims are forced into sex work or to perform sexual acts against their wishes and without their consent.

4. Prevention of Modern Slavery within the Company and our Supply Chain

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective system and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains. We will respect human rights in all our operations and business dealings.

5. Compliance with this Policy

- **5.1** We are committed to the prevention, detection and reporting of modern slavery in any part of our business or supply chains.
- 5.2 All employees in the Company are bound by this policy. You must read, understand and comply with this policy and you are also required to avoid any activity that might lead to or constitute modern slavery.
- 5.3 If you believe there is an activity that might lead or constitute modern slavery or if you have knowledge that a breach of this policy has occurred, you should immediately raise any concerns and report your suspicion/breach to your respective Country HR head or Regional HR head or Regional Headquarters Legal ("RHQ Legal") or through the whistle-blowing channel at whistleblowing@persolkelly.com. You are also encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. In the event you are unsure about whether a particular act, the treatment of workers, or their working conditions within our business or supply chains constitutes any of the various forms of modern slavery, you can raise the concerns to your supervisor or RHQ Legal.

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5.4 We encourage and practice openness and will support anyone who raises concerns in good faith under this policy. We are committed to ensuring that no persons will suffer any detrimental treatment as a result of raising their concerns or reporting their suspicion in good faith in regard to the modern slavery practice that is or may be taking place in the workplace or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern.

6. Breach of this policy

Any suspected breach of this policy by our employees will be investigated and any violation to this policy will result in disciplinary action, which may lead to termination of employment. In the event there are any suspicions or concerns that other individual(s) or organization(s) performs a modern slavery activity, we may review/terminate our relationship with such individual(s) and organization(s) working on our behalf or we have business dealing with, if they are found to be in breach of this policy.

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