

1. Introduction

PERSOLKELLY Pte. Ltd. and its subsidiaries (individually and collectively referred as the “**Company**”, “**We**” or “**Us**”) have zero-tolerance policy against all forms of modern slavery, forced labour, and human trafficking. We are committed to upholding our responsibilities to preventing acts of modern slavery from occurring within our operations and the supply chain by introducing effective system and controls through this policy and ensuring that our business practices are conducted with integrity and in compliance with the laws.

Our commitment in preventing acts of modern slavery is strongly aligned with the principles that our parent company practices (PERSOL Holdings Co., Ltd, herein referred to as “**PERSOL**”), which is to respect and uphold human rights.

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, Forced Labour and Human Trafficking

- 3.1 The International Labour Organization (ILO) defines modern slavery as a situation where someone is forced to work and cannot leave or refuse because of threats, violence, coercion, deception, and abuse of power. The term “Modern Slavery” includes many forms of exploitation including but not limited to human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour.

4. The Risk of Modern Slavery, Forced Labour and Human Trafficking in our Operations

- 4.1 The table below highlights the potential modern slavery risks within the Company’s businesses:

| PERSOLKELLY’s Businesses | Potential Modern Slavery Risks |
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| Workforce Solutions Services <ul style="list-style-type: none">• Recruitment for temporary and permanent placements | <ul style="list-style-type: none">• Labour exploitation This involves forcing a person to work long hours for little or no pay in poor conditions under verbal or |

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| <ul style="list-style-type: none">• Human Resource Consulting and professional advice• Human Resources related services | <p>physical threats of violence to the person or the person's families.</p> <ul style="list-style-type: none">• Domestic servitude This is when 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. 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.• Deceptive recruitment and coercion This is when victims are often tricked into jobs where they are paid little or nothing and they are not able to leave because they have been manipulated into debt or have their identity documents confiscated. |
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5. Prevention of Modern Slavery within the Company and Our Supply Chain

5.1 Given the potential risks that we have identified in paragraph 4 above, we have implemented and enforced effective governance, systems and controls to ensure that no forms of modern slavery exist within our businesses or in any of our supply chain. In this respect, we have taken the following actions in managing and mitigating those mentioned potential risks:

| Company's efforts in managing and mitigating the Risks | |
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| Corporate Governance | <p>1. Implementing policies in the Company</p> <ul style="list-style-type: none"> • PERSOL Group Human Rights Policy • PERSOLKELLY Compliance Manual • PERSOLKELLY Code of Conduct • PERSOLKELLY Whistleblower Policy • PERSOLKELLY Anti-Harassment Policy • PERSOLKELLY Diversity, Inclusion & Equality (DI&E) Policy • PERSOLKELLY Workplace, Health and Safety Policy • PERSOLKELLY Privacy Policy <p>2. Annual review of the policies</p> |
| Training | <p>Conducting annual mandatory trainings to Company's employees</p> <ul style="list-style-type: none"> • Human Rights Training • Compliance Training • Modern Slavery Training |
| Compliance of laws | <p>1. Service Contracts/Vendor Contracts</p> <ul style="list-style-type: none"> • We have Modern Slavery clause in our template service contract with our clients and partners, to ensure that partners, vendors and clients that we engage with comply with our standard modern slavery requirements. |

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| <p>Compliance of laws</p> | <p>2. Licenses</p> <ul style="list-style-type: none"> • We ensure that all our business entities possess the required business licenses to operate by renewing the licenses according to the requirement of laws. • We only engage with partners, clients and vendors that possess the required licenses to operate their business. • We perform brief background checks on partners, clients and vendors before we decide to sign with them. <p>3. Employment/Labour Laws</p> <ul style="list-style-type: none"> • We ensure that all our employees are provided with decent and fair wages, reasonable working hours with adequate rest, achievable KPIs and where applicable, allow workers that work overtime to be compensated in accordance with the applicable law. <p>4. Safe and Appropriate Work Environment</p> <ul style="list-style-type: none"> • We ensure our employees and contractors receive adequate trainings relating to the assignments. • We ensure to provide necessary equipment that are safe to be used by our employees. • We ensure that the clients we engage with, provide a safe working environment to our employees. |
| <p>Audit</p> | <ul style="list-style-type: none"> • We conduct modern slavery audit and/or investigation on our client or partner if there is a report or allegation of actual or suspected modern slavery activities (in any form) being raised raised to our Company. |
| <p>Third Party Assessment</p> | <ul style="list-style-type: none"> • We continue to conduct annual review and assessment through a third party |

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| | sustainability assessment company, EcoVadis, to assess risks identified in our business processes and policies, as well as mitigate those risks. |
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5.2 As part of our consultation and collaboration with our parent company (PERSOL), we practice transparent reporting of modern slavery to PERSOL to help us prevent and/or mitigate risks of modern slavery. From our records, to date, we are proud that our reports show that we have zero modern slavery activities occurring in our Company and supply chain.

6. Compliance with this Policy & Other Relevant Policies

6.1 We are committed to the prevention, detection and reporting of modern slavery in any part of our business or supply chains.

6.2 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.

6.3 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.

6.4 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 mentioned here includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern or report.

7. Compliance with this Policy & Other Relevant Policies

7.1 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 individuals or organizations performs a modern slavery activity, we will

review the relevant contracts and terminate our relationship with such individuals and organizations if they are found to be in breach of this policy.

8. Our Future Focus

8.1 Moving forward, PERSOLKELLY in collaboration with our parent company (PERSOL), will continue to operate in accordance with our vision and values, to establish our aspiration of “Work and Smile” within our group. We will continue our efforts in identifying and mitigating modern slavery risks within the Company group by taking the following actions:

| PERSOLKELLY’s Committed Actions | Descriptions of Actions |
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| Conduct modern slavery audit | <ul style="list-style-type: none"> We will conduct modern slavery audit and investigation on our partners, vendors and clients that we engage with, if there is report or allegation of actual or suspected modern slavery activities being raised to our Company. |
| Annual review PERSOLKELLY’s policies and update for improvements to meet requirements of law | <ul style="list-style-type: none"> We continue to conduct annual review of PERSOLKELLY’s policies and update them as and when there is improvement on the practices/law. |
| Annual third-party assessment | <ul style="list-style-type: none"> We continue to conduct annual review and assessment through a third-party sustainability assessment company, EcoVadis, to assess risks identified in our business processes and policies, as well as mitigate those risks. We review feedback given from EcoVadis to improve our processes and policies to meet the global’s standard requirements and for further improvement opportunities. |