



HUMAN RIGHTS POLICY

1. Policy overview and Serko's commitments

This Human Rights Policy (policy) details the commitment of Serko Limited and its subsidiaries (Serko, Company, we, us, our) to respect and support human rights and to take reasonable steps to identify and address the risk of modern slavery and human trafficking across our business operations and supply chain.

Serko is committed to complying with legal requirements which protect human rights and labour standards and operating in a manner consistent with internationally recognised human and labour rights, including the Universal Declaration of Human Rights.

2. Who must comply with this policy?

This policy applies to Serko's operations and business activities worldwide. It applies to all persons working for us or our wholly owned subsidiaries or on our behalf in any capacity, including employees at all levels, directors, officers, consultants, contractors, interns, secondees, external consultants, third-party representatives, agents and business partners.

3. Core human rights policy principles

We are committed to the following human rights principles:

Fair employment practices

- Treat all employees with respect and fair employment practices in accordance with the law, human rights and health and safety obligations. This includes ensuring:
 - employee wages meet at least the legally mandated minimum, and are sufficient to meet basic needs and provide some discretionary income (often referred to as a living wage);
 - working hours comply with applicable laws;
 - fair and equitable remuneration and reward practices are applied in accordance with our Remuneration Policy; and
 - all employees are provided with paid annual leave.
- Not use child labour in any part of our business and ensure employees meet the local legal age of employment.
- Only engage employees to work on a voluntary basis and never have employees work under threat or penalty of any kind.
- Not engage in serious exploitation behaviour where coercion, threats or deception is used to exploit victims and undermine their freedom.

- Facilitate and promote equal employment opportunities, including (but not limited to) diversity of culture, gender and age.
- Not tolerate any form of discrimination, harassment or bullying, and are committed to employing, developing and promoting employees on the basis of their capabilities, qualifications and experience in accordance with applicable laws and Serko's Anti-Harassment, Discrimination and Bullying Policy.

Women's rights

Respect the rights of women and promote their full and effective participation at Serko.

Freedom of association and collective bargaining

Respect employees' freedom of association, their right to join or form trade unions and their right to bargain collectively without fear of reprisal, intimidation or harassment, in accordance with local laws.

Right to privacy

Respecting the right to privacy of all individuals by protecting their personal data in accordance with applicable privacy and data protection laws and Serko's policies.

Freedom of expression

Respect the right of all individuals, including employees, to freedom of expression and opinion in accordance with applicable laws and Serko's policies (including our Anti-Harassment, Discrimination and Bullying Policy and Code of Ethics).

4. Human rights and modern slavery

As part of our overall commitment to human rights and the principles set out in section 3, Serko takes reasonable steps to identify, prevent, and address risks of human rights violations, including modern slavery, across our operations and supply chains as described below. In doing so, we remain guided by our purpose, vision and guiding principles.

Serko recognises that modern slavery is a severe breach of human rights. Forms of modern slavery include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour and may involve situations where coercion, threats or deception are used to exploit individuals and undermine their freedom and dignity. Such exploitation can occur in any country, industry or supply chain, and it causes lasting harm to victims and communities.

We demonstrate commitment through:

- Adherence to applicable human rights, privacy, labour and anti-slavery laws and regulations in all jurisdictions we operate.
- Adherence to ethical labour practices (including recruitment, employment contracts, wages and employment conditions).
- Our Business Partner Code of Conduct, covering:
 - compliance by our business partners (suppliers and resellers);
 - risk assessments of our material business partners;
 - supply chain due diligence and sanctions screening; and

- making efforts to understand what our business partners are doing in respect of modern slavery, including engaging, discussing and encouraging them to adopt policies, introduce processes and prevent modern slavery.
- Providing our people with training, tools and awareness to recognise, report and respond to potential human rights or modern slavery concerns.
- Encouraging our people to escalate and, as soon as reasonably practicable, report any instances of breaches with this policy.
- Continuously improving our approach to human rights and modern slavery through regular review.

5. Breaches of this policy

It is important to Serko to ensure we maintain high ethical standards, and therefore everyone working in our team plays a role in keeping Serko safe. If you think Serko could be in breach of this policy, we ask you to please speak up. It is better to be wrong, but safe, than ignore a potential breach. Remember, if you See Something, Say Something.

If you know about or suspect a breach of this policy, please reach out to someone in the Legal team or email legal@serko.com. For guidance on alternative reporting options, please refer to the [See Something, Say Something](#) page on the Serko intranet and Serko's [Whistleblowing Policy](#).

Complying with Serko policies is a condition of employment.

6. Roles and responsibilities

Role	Responsibility
Board	Approval and oversight of the policy. The Board should be provided with the findings following an annual review to ensure that the policy is operating effectively with no breach instances.
Legal team	Operationalising privacy and supply chain elements of the policy through employee awareness and communications. To monitor compliance with the policy from a supply chain perspective and provide assurance to the Board that the policy is being complied with.
PPC team	Operationalising people and culture elements of the policy through employee awareness and communications. To monitor compliance with the policy from a people and culture perspective and provide assurance to the Board that the policy is being complied with.
All employees	Must comply with this policy.

If you have any questions or need help with this policy, you can contact the Senior Risk and Compliance Manager.

7. Serko documents related to this policy

- Code of Ethics
- Business Partner Code of Conduct
- Inclusion & Diversity Policy
- Anti-Harassment, Discrimination and Bullying Policy
- Whistleblowing Policy
- Remuneration Policy
- Data Protection Policy

8. Governance

Document Owner	General Counsel & Company Secretary
Document Contact	Senior Risk and Compliance Manager
Document Approver	Board
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