



MODERN SLAVERY POLICY

1. Policy Overview and Serko's Commitments

The modern slavery policy ("the policy") details Serko Limited's and its subsidiaries ("Serko") commitment to taking reasonable steps to identify and address the risk of slavery and human trafficking across our business operations and supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships. This policy should be read alongside Serko's Code of Ethics and other relevant policies.

Serko is not currently required to publish a modern slavery statement but has elected to implement modern slavery risk management within its operations on a voluntary basis.

This Modern Slavery Policy provides an overview of the approach Serko follows in identifying and addressing modern slavery risks in Serko's operations and supply chains.

This Policy applies to all persons working for or on behalf of Serko in any capacity, including employees, directors, officers, and contractors.

2. What is modern slavery?

Modern slavery is serious exploitation where coercion, threats or deception is used to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage
- Child labour

Modern slavery can occur in every industry and sector and has severe consequences for victims.

3. Addressing modern slavery risks in our organisation and supply chain

In staying true to our purpose, vision and values, we're fully committed to preventing slavery and human trafficking in our operations and as far as possible, within our business partner network.

We strive for a culture where Serko people are committed to doing the right thing, to using company policies (such as the Code of Ethics and Business Partner Code of Conduct) to help inform and determine what the right thing is and to feel safe raising the alarm if they have concerns.

We demonstrate commitment to preventing modern slavery through our:

- Adherence to applicable laws and regulations in all jurisdictions we operate.
- Adherence to ethical labour standards (including recruitment, employment contracts, wages and employment conditions) in all jurisdictions we operate.



- Introduction of our enhanced Business Ethics and Supply Chain Program, covering:
 - A risk assessment of our material business partners (suppliers and clients)
 - Supply chain due diligence
 - Sanctions screening
- Effort to understand what our business partners are doing. Engaging, discussing, and encouraging them to adopt policies, introduce processes and prevent modern slavery.
- Commitment to giving our people the knowledge through training and awareness campaigns to understand modern slavery, the impacts, the red flags, the reporting processes, and Serko's commitment to preventing all forms of modern slavery.
- Facilitate and promote equal employment opportunities including (but not limited to) diversity of culture, gender and age.
- Continuous improvement.

4. 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.

5. Policy Principals

The following policy principles must be complied with:

- Serko is committed to the respect of all human rights.
- We will treat all employees with respect, and fair employment practices in accordance with the law, human rights, and health and safety obligations.
- We will not use child labour in any part of its business and ensure employees meet the local legal age of employment.
- We will only engage employees to work on a voluntary basis and never have employees do work under threat or penalty of any kind.
- We will not engage in serious exploitation behaviour where coercion, threats or deception is used to exploit victims and undermine their freedom.
- We expect our business partners to comply with our Business Partner Code of Ethics.
- We will escalate and, as soon as reasonably practicable, report any instances of breaches with this policy.

6. 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 Employee Hub and Serko's Whistleblowing Policy.

Complying with Serko policies is a condition of employment.

7. Roles and Responsibilities

The Serko Board is the policy approver.

The Audit, Risk and Sustainability Committee is responsible for oversight and monitoring of this policy.

The Serko Audit, Risk and Sustainability Committee should be provided with the findings following an annual review to ensure that this policy is operating effectively with no breach instances.

The Serko Compliance Officer is the General Counsel and the owner of this policy. The Risk & Compliance team are responsible for operationalising the policy through employee awareness and communications. The Risk & Compliance team are responsible for providing assurance to the Audit, Risk and Sustainability Committee that the policy is being complied with.

If you have any questions or need help with this policy, you can contact the Serko Risk & Compliance team.

8. Serko documents related to this policy

- Code of Ethics
- Whistleblowing Policy
- Corporate Governance Manual

9. Governance

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