



# MODERN SLAVERY STATEMENT

At Serko we believe our people are the heart of the organisation and being a good human is a foundation of our culture. The Serko guiding principle **Be a good human** means intentionally working to create a positive impact. We are committed to ethical conduct, including taking reasonable steps to identify and address the risk of slavery and human trafficking across our business operations and supply chain.

This Modern Slavery Statement is intended to complement our Code of Ethics, Business Partner Code of Conduct and outline Serko's approach and commitment to preventing and addressing modern slavery risks within our organisation and value chain globally.

Modern slavery includes forced labour, debt bondage, servitude, human trafficking, forced marriage, child labour, exploitation of migrant workers, including deceptive recruitment. Serko recognises that modern slavery can be hidden in plain sight and is a global issue with no country untouched. This statement covers Serko Limited and all its subsidiary companies globally. For more information about Serko, please go to [www.serko.com](http://www.serko.com).

## Our Operations and Structure

Serko Limited (the parent company of the Serko Group) is incorporated in New Zealand and is listed on the New Zealand and Australian stock exchanges. As a listed company, Serko and its subsidiaries adhere to the best practice recommendations determined by the NZX and ASX. Serko employs over 300 staff in New Zealand, Australia, the United States and China.

## Our Aims

Serko is committed to taking reasonable steps to identify and address the risk of slavery and human trafficking across our business operations and supply chain, including through:

- 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;
- our Business Partner Code of Conduct;
- our supply chain due diligence, sanctions and enforcement screening;
- commitments to give our people the knowledge through training and awareness campaigns to understand modern slavery impacts, risks and prevention tools; and
- facilitation and promotion of equal employment opportunities including (but not limited to) diversity of culture, gender, and age.

## Modern Slavery Risks

We consider there is a relatively low risk of modern slavery occurring through Serko's direct operations and value chain as:

- Serko is an office-based, software company operating headquartered in New Zealand.
- All Serko operations (including China) are overseen by executives based in New Zealand and Australia. New Zealand and Australia are each considered to have a low prevalence of modern slavery and governments that take strong action against it.<sup>1</sup>

---

<sup>1</sup> Walk Free Global Slavery Index 2023, available from <https://www.walkfree.org/resources/>

- Each of our offices share centralised, New Zealand-based financial, legal, risk, compliance and company secretarial functions.
- Most of Serko’s direct suppliers are based in New Zealand, Australia and the United States. All recruitment at Serko is overseen by our People, Performance and Culture team based in New Zealand.

Modern slavery risks are identified through our risk management process, using our Risk Management Framework. The monitoring, assessment and identification of any new risks is ongoing. Our risk management process helps us make sound ethical, operational and strategic decisions using a risk-based approach.

## Our People

Serko is committed to ensuring that a safe work environment is provided for all employees and that all employees are treated equally and with the upmost respect and dignity. We abide by all employment laws in the jurisdiction in which the prospective employee is being hired, often going above and beyond the requirements set out in law. One example of this would be our commitment to pay a minimum ‘living wage’ as opposed to ‘minimum wage’.

We operate a robust recruitment process that includes ‘right to work’ checks for all prospective employees.

Serko encourages all employees to raise concerns of any kind this includes potential or actual issues relating to modern slavery and policy breaches. There are multiple ways concerns can be raised, including via our whistleblowing policy.

## Our Business Partners

Serko’s Business Partner Code of Conduct (available on the [Serko website](#)) outlines Serko’s expectations of all third parties that provide goods or services to Serko (suppliers) and those that have access to Serko software (customers), the code includes expectations for employment conditions, working environment and respect for all.

As at the date of this Statement Serko’s direct suppliers are predominantly based in New Zealand (57%), Australia (21%), US (12%) and the remainder (10%) across other countries. We are not aware of any instances of modern slavery within our supply chain. If we become aware of an allegation, we will take appropriate action and ensure that it is reported to the relevant authorities.

## FY24 Progress

- **Awareness** – Serko launched a dedicated intranet page with employee communications on modern slavery, aimed at educating and raising awareness of modern slavery, the risks Serko faces and how we can all help and work together in an attempt to eradicate it.
- **Analysis** – A risk assessment for all material business partners was introduced, together with ongoing sanctions and enforcement screening. Should any modern slavery concerns be raised during this process a thorough investigation by Serko’s Compliance Officer would be completed. As at the date of this Statement, we are not aware of any instances of modern slavery within our supply chain. If we become aware of an allegation, we will take appropriate action and ensure that it is reported to the relevant authorities.
- **Governance and Policies** – Serko’s “See something say something” programme was introduced in FY24 to encourage the reporting of anything of concern. This provides the information and tools, reporting options and encouragement for employees to raise a concern or discuss something that doesn’t feel right, working in tandem with Serko’s Whistleblowing policy.
- **Training and Awareness** – Employee training on Serko’s Code of Ethics was rolled out at the end of FY24, covering conduct and behaviours. This training is mandatory for all new starters during onboarding and will be rolled out to all employees periodically.



## Our Next Steps

- **Value Chain** – Serko intends to continue to monitor and improve its visibility of its supply chain to identify and mitigate any modern slavery risks.
- **Training and Awareness** – Serko will continue with periodic communications.
- **Reporting** – Regular reporting on compliance with the Modern Slavery Policy will be delivered to the Board/Board Committees (as appropriate).

This statement covers the period from 1 April 2023 to 19 March 2024 and has been approved by Board of Serko on 19 March 2024.