

Modern Slavery and Human Trafficking Statement

Last Updated: March 2025

This Modern Slavery and Human Trafficking Statement is made pursuant to Section 54 (1), Part 6 of the Modern Slavery Act 2015 (UK) and relates to actions and activities for the current financial year.

Our Business

Forced or compulsory labor, human trafficking and other kinds of slavery represent some of the gravest form of human rights abuse in any society. We all have a responsibility to be alert to the risks, however small, in both our business and in our wider supply chain. Our employees are expected to report concerns and management are expected to act upon them.

The use of exploitative labor and human trafficking is a criminal offense and is strictly forbidden in both our own operations and supply chains. We do not support or deal with any person or business knowingly involved in slavery or human trafficking.

Our Position

We expect employees to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us. Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- Adherence to applicable recruitment and employment legislation.

Partner and supplier due diligence

SmartRecruiters vets its partners and suppliers with the aim that they adhere to the same principles and standards as we do when it comes to rule out modern slavery and human trafficking in conducting their business.

- SmartRecruiters conducts a vendor assessment on all of our suppliers and business partners prior to engaging with them to ensure their values are aligned with ours.
- (Our Supplier and Business Partner Due Diligence requires (i) our suppliers to read and acknowledge the SmartRecruiters' Supplier Code of Conduct in connection with its vendor registration process and (ii) our business partners must read and agree to the SmartRecruiters' Code of Conduct, which is included in their agreements with us.

SmartRecruiters requires suppliers and business partners to submit to an annual audit pursuant to the terms of our agreements. During such audit, SmartRecruiters is entitled to verify and confirm compliance with the Supplier Code of Conduct, SmartRecruiters Code of Conduct, as well as this policy.

Employee Awareness

In order to make sure that our employees are aware of these issues and understand the company's values, SmartRecruiters will ensure this Statement is communicated effectively to all existing SmartRecruiters employees and new joiners. Additionally, SmartRecruiters requires all employees to familiarise themselves with the following policies in order to ensure we are conducting ourselves and our business in an ethical business manner: SmartRecruiters Employee Handbook, Whistleblower Policy, etc. SmartRecruiters requires employees certify their acceptance of these policies on an annual basis.

In the event SmartRecruiters becomes aware of or receives information that any of our suppliers or business partners are engaged in modern slavery or human trafficking or any violation of our Code of Conduct, SmartRecruiters will promptly act to address such allegations and report it to the relevant authorities, in compliance with our legal obligations.