



Document Number:	Effective: 1 July 2024
TES-GRP-HR-COMPLIANCE-Sustainability-006	GROUP POLICY & PROCEDURE: Modern Slavery

1. POLICY STATEMENT

SK tes prohibits and maintains a zero-tolerance stance towards any act of modern slavery and any individuals or organizations found engaging, supporting or assisting with such activities.

2. CONSEQUENCE OF VIOLATION

- 2.1. Employees found to have violated this policy will be subject to disciplinary measures, potentially leading to dismissal.
- 2.2. Additionally, we reserve the right to terminate relationships with any individuals or organizations working on our behalf for any violation of this policy.

3. SCOPE

Group policy – applies to all sites and locations.

- a) All **Employees** including interns, secondees, contractors etc.
- b) All **Business Partners** including vendors, contractors, suppliers, joint venture partners and any organizations SK tes has dealings with. While some processes may be exempted / excluded in 2024, full application is expected from 2026 onwards.

4. DEFINITION

Modern Slavery is characterized as the exploitation of individuals by others for personal or commercial benefit. Whether through deception, coercion, or compulsion, victims lose their autonomy. This encompasses, but is not restricted to, human trafficking, forced labor, and debt bondage.



5. POLICY

- 5.1 We promote awareness of this subject amongst our employees and Business Partners through the annual refresher training and renewal (signing) of the Business Code of Conduct.
- 5.2 Training is provided to enable employees to recognize signs and report potential abuses.
- 5.3 Anonymous reporting is available to employees and Business Partners to report abuse.
- 5.4 Risk-based Compliance Audits will be performed (on Business Partners) to ensure continuous compliance with the policy.

6. SPECIAL INSTRUCTIONS

Mandatory Indicator(s):	0 incident	(Confirmed Case)
Performance Indicator(s):	Not applicable	

7. REFERENCE

The following are the sub policies:

- (a) Child Labor TES-GRP-HR-Compliance-007
- (b) Involuntary (Forced) Labor SKTES-COM-HUM-010
- (c) Indebtedness and Debt Bondage (Elements contained in b; de-coupling considered)

8. INFORMATION AND REPORTING VIOLATIONS

- 8.1. Write to the Compliance and Audit Department for further information.
- 8.2. Violations or suspected violations can be reported:

- (a) anonymously on the whistleblowing portal: sktes.ethicspoint.com
- (b) email to the Ethics and Compliance Council (ECC): ecc.global@sktes.com

9. REVISION

Default to revise bi-annually (once every 2 years).

10. DOCUMENTATION

- 10.1. Annual refresher training and Business Code of Conduct (including Supplier's version) to



contain policy position and / or statement.

LIMITED DISTRIBUTION – NOT TO BE SHARED EXTERNALLY

11. PROCEDURES

11.1. Compliance Violation Response and Management

Human Rights violations are complex and unique for every case. The following articulated process may be amended according to suit individual situation.

- (a) **Inform** – Compliance Director notify ECC within 24 hours.
- (b) **Establish Credibility** – Facts and case credibility must be established. This includes information on the perpetrator and victim. Proposed case management must be ready and presented within 72 hours.
- (c) **Identify and Engage Counsel** – Engage legal counsel for advice and next steps based on policy position.
- (d) **Consult** – Discuss (with ECC) and execute action plans accordingly.
- (e) **Disclosure** – Inform relevant local authority accordingly.
- (f) **RCA** – Perform post incident Root Cause Analysis (RCA) and develop corrective plans to prevent future incidents.

11.2. Reporting Violation(s) to the Authority

The following are the reporting protocols, should one be required.

- (a) Report will be made in the jurisdiction where the incident took place.
- (b) The Compliance Director, through 11.1 (c), will determine which relevant authority to notify i.e. Police, Labor Ministry or Social Services.
- (c) The Compliance Director will inform and instruct the Managing Director, Country GM or Country HR in this order of succession, who shall make the police report.
- (d) Any SK tes individual who is allegedly involved in the transactions will be named to facilitate



future investigations.

- (e) However, the alleged (named) SK tes individual will be allowed to continue his / her duties unless otherwise or until such time as instructed by the Courts or Public Prosecution.

11.3. **Compliance Audit**

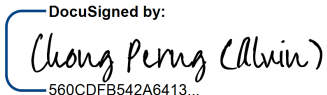
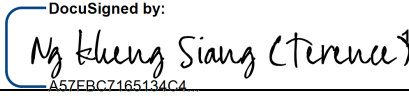
To ensure Business Partners adhere to the requirements of the policy, a risk-based Compliance Audit will be conducted, with the following perimeters considered.

- (1) Country risk, using Global Slavery Index:
<https://www.walkfree.org/global-slavery-index/>
- (2) High risk industry such as agricultural, construction or manufacturing.
- (3) Goods specific – High risk goods are (those involving producing or processing of) rice, spices, tea, coffee, cocoa and cotton.



12. Change of History

Revision Number	Author	Document Status/ Change	Revision Date	Effective Date
001	Susan Gleave	Initial Issue	NA	15 October 2021
002	AC	<ol style="list-style-type: none"> 1. Update SK tes branding and marks. 2. Document labelling as per document classification. 3. Remove (1) Introduction 4. Change (2) Objective to Policy Statement 5. Insert Consequence of Violation 6. Update Scope 7. Insert Definition 8. Update Policy 9. Insert Special Instructions 10. Insert Reference 11. Insert Reporting Compliance Violation(s) and Queries. 12. Insert Documentation 13. Develop Procedures 	8 May 2024	1 July 2024

Name & Signature (Date)	Updated By	
	Alvin Chong	<small>DocuSigned by:</small>  <small>560CDFB542A6413...</small>
		18-Jun-2024
Designation	Group Director; Risk, Compliance, Human Rights and Audit Compliance & Audit	
APPROVED BY:		
Name & Signature (Date)	<small>DocuSigned by:</small>  <small>A57EBC7165134C4...</small>	
	Terence Ng	18-Jun-2024
Designation	Executive Chairman & Group CEO	