



Human Rights & Modern Slavery Policy

Policy owner: Legal
Last updated: March 2025



About this policy

This Human Rights & Modern Slavery Policy ("Policy") covers all employees (past & present), officers, shareholders, consultants, contractors, freelancers, working students, interns, agency workers, job applicants and suppliers.

This Policy is not part of anyone's employment contract and can be changed by Staffbase at any time. It will be reviewed periodically to make sure it is up to date with current law and regulation.

Staffbase does not tolerate Modern Slavery and Child Labor

Staffbase (or “we”) is committed to ethical and transparent business practices, and to enforcing measures to respect human rights and to prevent modern slavery and child labor within our own operations and within our supply chains.

In this Policy you will learn about the concepts of Modern Slavery and Child Labor and how you, as a Communicorn, can help to prevent such practices within our operations and our supply chain.



Our expectations from business partners

We expect our business partners to provide a safe and fair work environment, to act in accordance with all applicable labor and employment laws and regulations and standards, such as the International Labor Organization Convention.

Our business partners, including suppliers, are expected to act in accordance with our [Business Partner Code of Conduct](#).

What is Modern Slavery?

Modern Slavery is a crime and a violation of fundamental human rights.

It takes various forms, such as slavery, servitude, forced and compulsory labour, child labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

What is Child Labor?

We define Child Labor in line with International Labour Organization (ILO) standards:

Child: Any person under the age of 18.

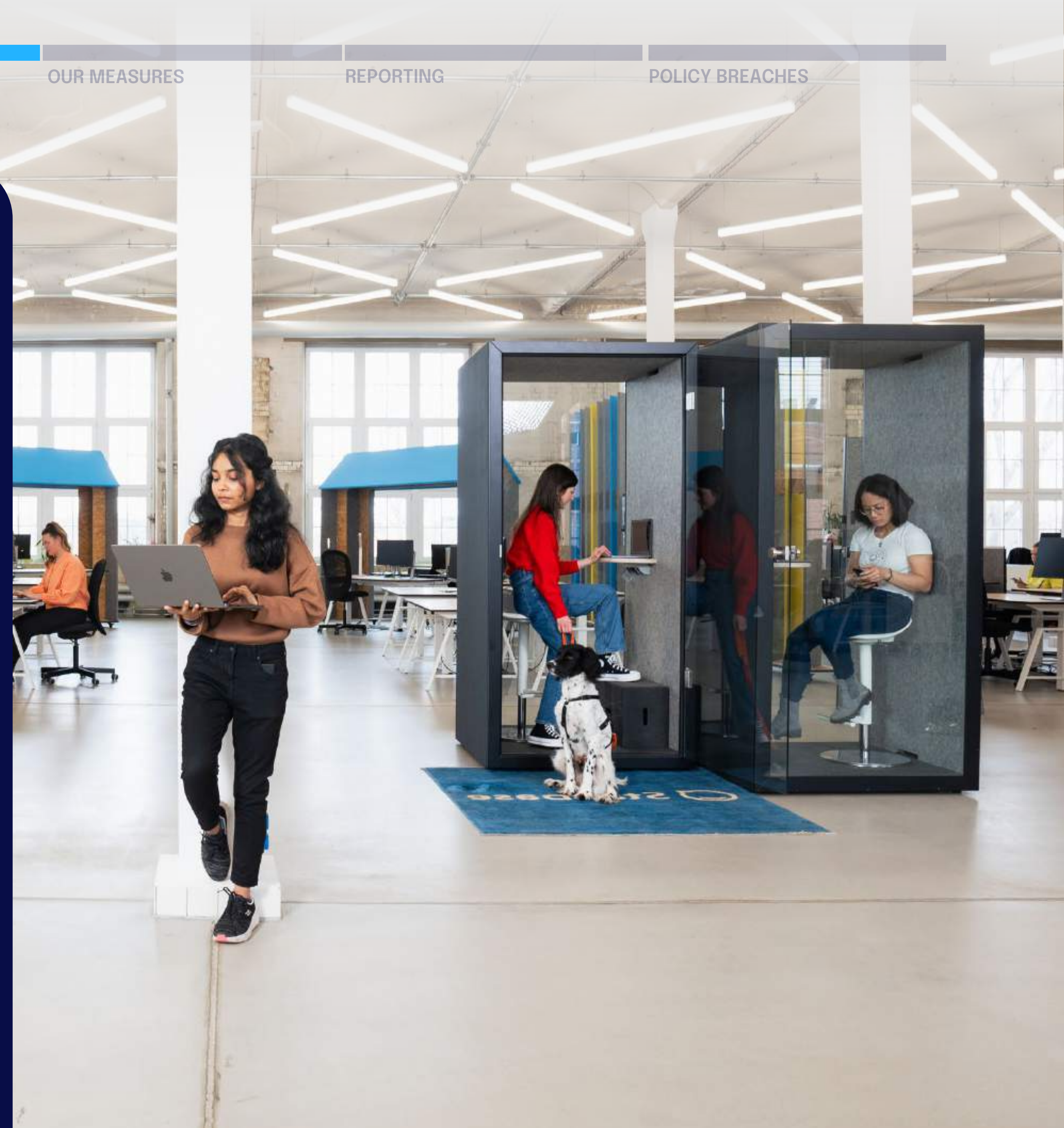
Child Labor: Any work that deprives children of their childhood, education, or is harmful to their physical and mental development.

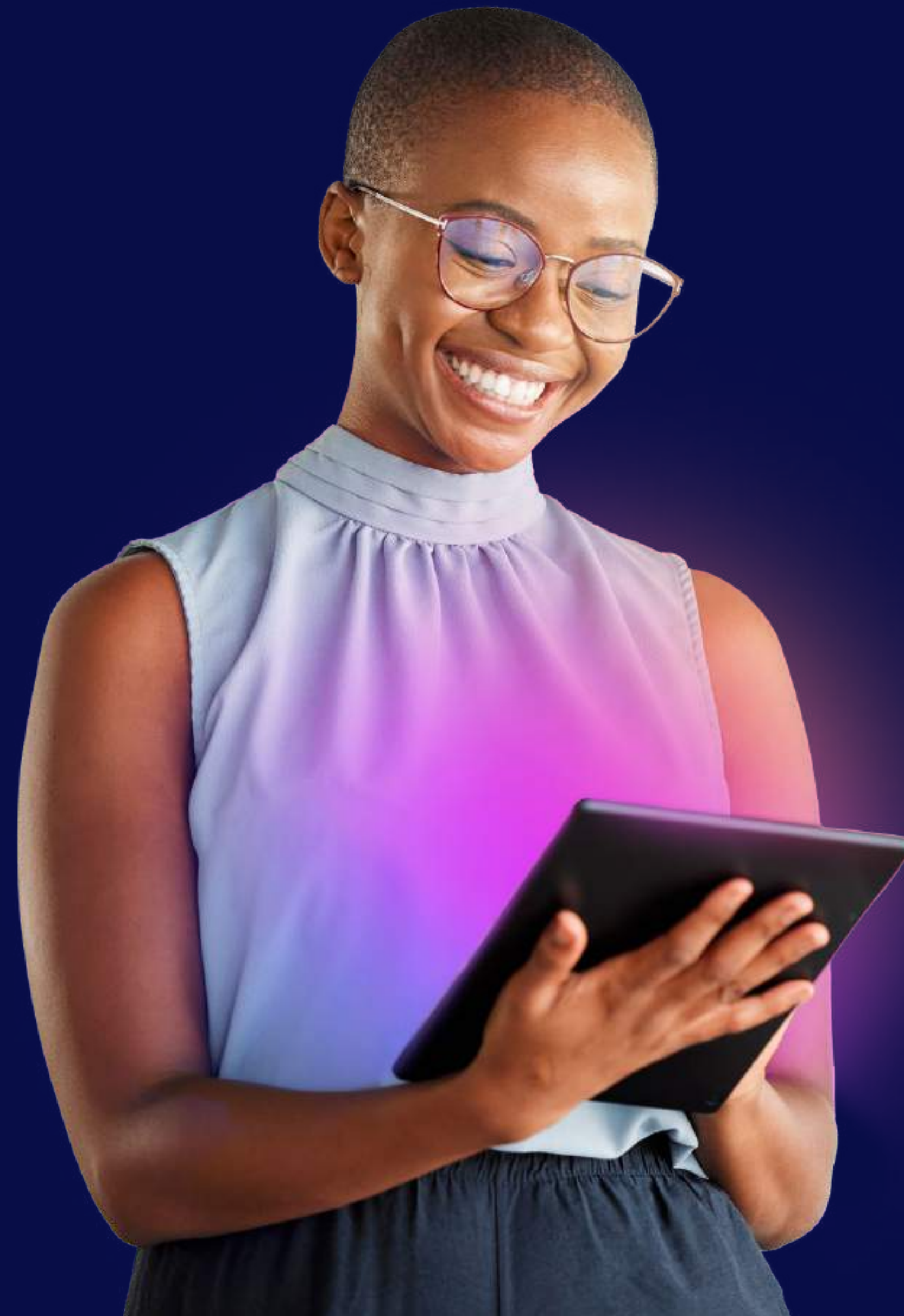


Our Commitment

At Staffbase we strive to:

- Act ethically and with integrity in all business dealings and relationships.
- Provide safe, respectful, and healthy working environments where all Communicorns are treated with dignity and respect.
- Implement practical measures and procedures to mitigate risks of Modern Slavery and Child Labor in our operations and, to the extent we can, in our supply chains.
- Monitor such measures to ensure ongoing effectiveness and, where needed and practically possible, to take proper action to remediate harm caused by Modern Slavery and Child Labor.
- Comply with applicable laws and regulations where we operate.





Measures to protect human rights

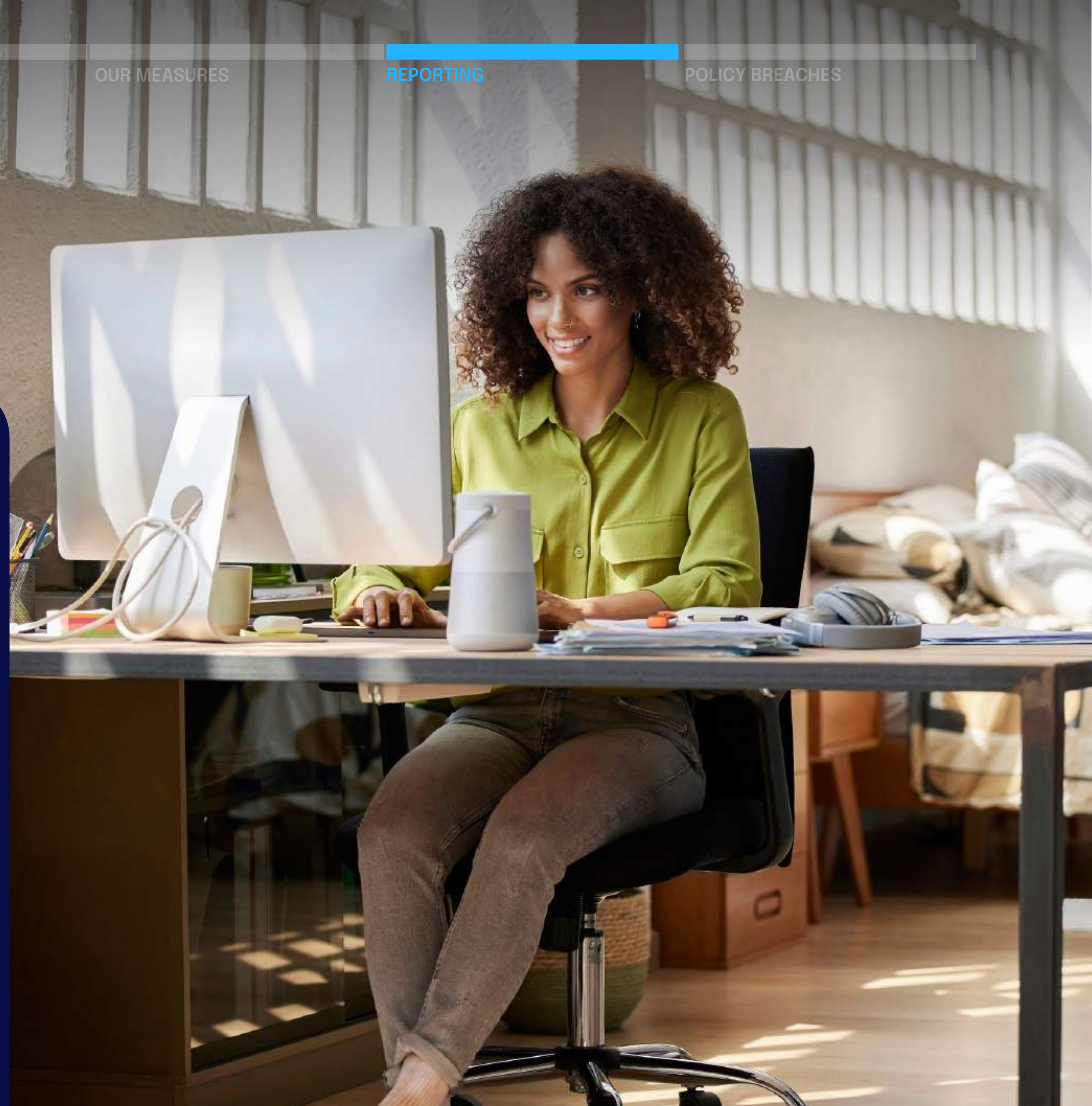
- ✓ We only use reputable employment agencies to source staff.
- ✓ We verify the age of staff during our recruitment process
- ✓ Our Code of Conduct communicates our zero-tolerance of Modern Slavery and Child Labor. You are required to acknowledge compliance with Staffbase's Code of Conduct on an annual basis and to ensure you complete mandatory training courses.
- ✓ We conduct due diligence on our suppliers and business partners. We strive to only work with business partners that share our commitment to protect human rights.
- ✓ We provide various ways for Communicorns, suppliers, and partners to report concerns.

Reporting

If you believe or suspect a breach of this Policy or if you have any suspicion of Modern Slavery, Child Labor, or other unethical behavior in any parts of our own operations or within our supply chain, make sure to report this at the earliest stage possible.

We offer various reporting channels, including:

- your line manager
- our anonymous [Whistleblowing Platform](#)
- our internal PX complaint procedure
- the [Legal Helpdesk](#)
- via email to compliance@staffbase.com



No detrimental treatment

We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion of Modern Slavery, Child Labor, or any other form of human rights violation in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Report any detrimental treatment

If you believe that you have suffered any detrimental treatment related to concerns you raised, please inform the PX Team immediately.

If you wish to remain anonymous, you can use our [Whistleblowing Platform](#) to report your concerns.

All concerns raised are thoroughly and impartially reviewed and remediated as appropriate.

Breaches of this Policy

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal.

We may terminate our relationship with other individuals and organizations working for us or on our behalf without notice if they breach this Policy.

