Modern slavery policy- HR Path Group

C2 - CONFIDENTIAL

Modification History

Version	Date	Author	List of Changes
V1 V2-00 V2.01	2023 02/04/2025 09/09/2026	Jérôme BOUDIER Bertille GERARD Jérôme BOUDIER	Creation Structuring Strengthening: Scope of application, governance and responsabilities

Version	Reviewer	Date	Approver	Date
V1 V2.00 V2.01	Jérôme BOUDIER Jérôme BOUDIER Jérôme BOUDIER	2023 07/04/2025 09/09/2026	Jérôme Boudier Jérôme Boudier Jérôme Boudier	2023 2025 2026

Table of Contents

Table of Contents 3

1. Purpose 4

2. Scope 4

3. Our Commitments 4

4. Governance and Responsibilities 5

5. Risk Assessment and Due Diligence 5

6. Supplier Expectations 5

7. Reporting Concerns 7

8. Corrective Actions 7

9. Training and Awareness 7

10. Monitoring and Review 8

HR Path is committed to conducting business ethically, responsibly and with respect for internationally recognised human rights. We have a zero-tolerance approach to modern slavery, forced labour, human trafficking, child labour and any form of exploitation within our operations, business relationships and supply chain.

1. Purpose

The purpose of this statement is to set out HR Path's commitment to preventing, identifying and addressing risks of modern slavery and human trafficking in its own activities and across its supply chain. This statement reflects our commitment to comply with applicable laws and to align our practices with international standards, including the principles of the UK Modern Slavery Act, the International Labour Organization standards, the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights.

2. Scope

This policy statement applies to all HR Path entities, employees, managers, directors and representatives worldwide. It also applies to suppliers, subcontractors, service providers, consultants and other business partners acting on behalf of or providing goods and services to HR Path.

Based on this scope, HR Path is committed to respecting fundamental human rights in all its activities and business relationships. The Group operates in accordance with applicable international and local laws and regulations, and aligns its approach with recognised principles covering dignity, non-discrimination, freedom of association, fair working conditions, and the prevention of forced labour, child labour and human trafficking. This statement is reviewed periodically to ensure it remains relevant, effective and consistent with evolving legal and regulatory requirements.

3. Our Commitments

HR Path is committed to preventing, identifying and addressing modern slavery and human trafficking risks across its operations and value chain.

- Prohibits all forms of modern slavery, forced or compulsory labour, human trafficking, child labour, servitude and debt bondage.

- Expects all workers to be employed freely, voluntarily and under lawful employment conditions.
- Does not tolerate restriction of movement, withholding of identity documents, abusive recruitment fees, intimidation, coercion or any other practice that may indicate forced labour.
- Does not charge recruitment fees or related costs to employees or workers, where prohibited by applicable law and HR Path requirements.
- Requires suppliers, subcontractors and business partners to respect applicable human rights, labour and anti-slavery laws and standards.
- Promotes fair, safe and respectful working conditions throughout its value chain.
- Takes a risk-based approach to preventing and addressing modern slavery risks and continuously seeks to improve its practices.

4. Responsible Recruitment

HR Path is committed to ensuring that recruitment and employment practices respect human rights and applicable labour laws.

As part of its recruitment practices, HR Path aims to ensure that:

- Employment is entered into freely and voluntarily.
- Employees receive clear information regarding the terms and conditions of their employment.
- No employee is required to pay recruitment fees or other abusive employment-related costs.
- Employees retain control of their personal identity documents, except where temporary retention is legally required and appropriately controlled.
- Recruitment and employment practices comply with applicable local laws and regulations.
- Recruitment practices are conducted fairly and without coercion, intimidation or discrimination.
- Potential indicators of forced labour, exploitation or human trafficking are appropriately escalated and investigated.
- Relevant recruitment and HR teams are expected to remain alert to potential indicators of modern slavery and to escalate concerns through the appropriate internal reporting channels.

5. Risk Assessment and Due Diligence

HR Path applies a risk-based approach to identify, assess and manage modern slavery and human rights risks.

Risk assessment may consider factors including:

- The nature of the services or activities performed.
- The use of temporary labour, subcontractors or outsourced services.
- Country and sector-specific human rights risks.
- Recruitment practices and labour supply chains.
- Facilities management and other labour-intensive services.
- Procurement categories and suppliers with potentially increased exposure to labour rights risks.

Where relevant, HR Path may perform appropriate due diligence before engaging with suppliers or business partners and during the relationship.

Depending on the level of risk, due diligence may include:

- Supplier or business partner identification and risk classification.
- Review of relevant policies, certifications and compliance information.
- Assessment of labour and human rights practices.
- Contractual requirements relating to human rights and modern slavery.
- Requests for supporting documentation or evidence where appropriate.
- Escalation and corrective action where material risks are identified.
- Periodic reassessment of higher-risk relationships.

The level of due diligence is proportionate to the nature and level of risk and takes into account applicable laws and regulations.

6. Supplier Expectations

HR Path expects suppliers, subcontractors, service providers, consultants and other business partners to respect internationally recognised human rights and comply with applicable labour and anti-slavery laws.

Where relevant, suppliers are expected to:

- Prohibit forced labour, human trafficking, child labour and other forms of exploitation.
- Provide lawful and fair working conditions.
- Avoid charging workers abusive recruitment fees or related costs.
- Respect workers' freedom of movement and retain appropriate control over their personal documents.
- Maintain appropriate policies, procedures and controls to identify and prevent modern slavery risks.
- Cooperate with HR Path's due diligence and information requests.
- Report material concerns or incidents relating to modern slavery or human rights violations.

Where significant risks or breaches are identified, HR Path may require corrective action and may review, suspend or terminate the relevant business relationship in accordance with applicable contractual arrangements and laws.

7. Reporting Concerns

Employees, suppliers, business partners and external stakeholders are encouraged to report any concern, suspicion or incident relating to modern slavery, forced labour, human trafficking, child labour or other human rights violations.

Reports may be submitted through HR Path's applicable internal reporting and whistleblowing channels.
HR Path is committed to:

- Taking reported concerns seriously and assessing them appropriately.
- Maintaining confidentiality to the extent possible and permitted by applicable law.
- Protecting individuals who raise concerns in good faith.
- Prohibiting retaliation against individuals who report concerns or participate in an investigation.
- Investigating allegations appropriately and taking proportionate corrective or remedial action where required

8. Corrective Actions

Where a modern slavery risk or incident is identified, HR Path will seek to respond proportionately and effectively. This may include further investigation, engagement with the relevant parties, implementation of corrective action plans, monitoring of progress, suspension of business relationships or termination where serious breaches are confirmed and remediation is not achieved.

HR Path's corrective action process is designed to ensure that potential or confirmed risks are first identified and assessed, then reported through the appropriate channels, investigated in a proportionate manner, addressed through suitable corrective or remedial measures, and finally monitored to verify progress and effectiveness over time.

9. Training and Awareness

HR Path promotes awareness of modern slavery, human rights and responsible business conduct among relevant employees.

Targeted awareness or training may be provided to employees and teams whose activities may expose them to modern slavery risks, including:

- Human Resources and recruitment teams.
- Procurement and supplier management teams.
- Legal and compliance functions.
- CSR and sustainability teams.
- Managers and employees involved in relevant operational activities.

Training and awareness activities may include guidance on identifying potential indicators of modern slavery, responsible recruitment practices, supplier due diligence and appropriate reporting and escalation procedures.

Where applicable, completion of relevant training and awareness activities may be monitored through HR Path's learning and HR systems.

10. Monitoring and Review

HR Path monitors the effectiveness of its approach to preventing and addressing modern slavery risks and is committed to continuous improvement.

Where appropriate, HR Path may monitor indicators including:

- Completion of relevant awareness and training activities.
- Integration of human rights and modern slavery criteria into supplier assessments.
- Number and nature of concerns reported through available reporting channels.
- Number of investigations initiated and completed.
- Corrective action plans and their completion status.
- Periodic review of higher-risk suppliers and business relationships.
- Review and update of this statement and related procedures.

The results of monitoring activities may be used to identify areas for improvement and to strengthen HR Path's policies, processes and controls.

This statement is reviewed periodically to ensure continued alignment with applicable legal and regulatory requirements, recognised international standards and HR Path's evolving risk profile.