

Modern Slavery Statement

For the reporting period 1 July 2023 to 30 June 2024.

Introduction

PageUp is committed to combating modern slavery and human trafficking in all its forms. This statement outlines our commitment to ensuring that modern slavery does not occur in our business or supply chains, in compliance with applicable laws, including the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) (Australia).

This statement is made by PageUp People Ltd (Australia) and its related entities and subsidiaries (together PageUp) including:

- PageUp People Ltd (UK)
- PageUp People Inc (US)
- PageUp People Pte Ltd (Singapore)
- eArcu Limited
- PathMotion S.A.S.
- PathMotion UK Limited
- Clinch Technology Limited

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Structure

Established in 1997 in Australia and privately owned, PageUp has approaching 30 years of experience in delivering Cloud based talent management software solutions to 650 commercial and government organisations globally. Headquartered in Melbourne, with offices in the US, EU, UK and Asia, PageUp's client base spreads across over 190 countries and is used by over 50 million end users globally.

Since 2019 PageUp has acquired 3 companies that support our growth strategy to expand in our key and complementary markets. The first was Dublin-based Clinch Talent in 2019. The acquisition of Clinch expanded PageUp's recruitment software offering to include sophisticated proactive sourcing and other recruitment tools including content management, automated recruitment marketing and enhanced candidate relationship management. In 2021 PageUp acquired PathMotion, a UK/French pioneering SaaS platform that allows organisations to create highly relevant employee-generated content to attract and engage quality applicants. Most recently, in 2021 PageUp expanded its UK footprint through the acquisition of eArcu, a leading one stop shop talent acquisition suite.

Operation & Supply Chain Risks

PageUp provides a SaaS-based application that automates processes for recruitment purposes.

PageUp engages a relatively small number of suppliers, the majority being Australian, US or EU based and related to its software and product development.

Our operating model represents a low risk generally, with few vendors having complex supply chain models, or from higher risk geography or sectors.

Our office-based operations, consumables and limited human capital contracting are areas of ongoing focus in terms of risk assessment.

Approach

PageUp aims to source and purchase goods or services which are produced and delivered under conditions that **do not** involve the **abuse or exploitation** of any persons.

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PageUp commits to:

- Conducting business with integrity, transparency, and respect for human rights.
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.
- Complying with all applicable anti-slavery and human trafficking laws, regulations, and codes, including the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Cth) (Australia).

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Policies & Procedures

PageUp has policies to ensure working conditions are compliant with applicable laws globally and free of modern slavery.

Our Modern Slavery Policy is intended to promote ethical and legally compliant business conduct and applies to all global PageUp group companies, permanent and fixed term employees, casuals, contractors, directors, volunteers, work experience students, and vendors.

Our Whistleblower Policy augments our approach by providing a mechanism for reporting any instance or suspicion of modern slavery practices.

To identify and mitigate the risks of modern slavery, PageUp:

- Conducts risk assessments to identify areas where there may be a higher risk of modern slavery.
- Performs due diligence as necessary on suppliers and partners to ensure their compliance with our standards.
- Audits supply chains where necessary to monitor compliance.
- Regularly reviews and updates our risk assessments and due diligence processes to ensure they remain effective.

Training

PageUp provides annual training to ensure that all employees are aware of the risks of modern slavery and understand the company's policies and procedures to address these risks. Training covers:

- Identifying the signs of modern slavery.
- Reporting procedures for suspected cases of modern slavery.
- Our commitment to ethical business practices and compliance with applicable laws.

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Assessing Effectiveness

PageUp has not identified any suspected or actual instances of modern slavery through its due diligence and risk assessments this year and have deemed our actions as satisfactory.

Looking Forward

PageUp will regularly review the effectiveness of our processes and procedures, at least annually, in conjunction with its subsidiaries to ensure they remain appropriate and effective in preventing modern slavery.

Approval

This statement is submitted by PageUp People Ltd and on behalf of its subsidiaries. The Board of PageUp People Ltd officially approved this statement on 25 March 2025.

A handwritten signature in black ink, appearing to read "Eric Lochner".

Eric Lochner
CEO and Director