welo global

Modern Slavery & Human Trafficking Statement

OCTOBER 2026



Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Welo Global, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the calendar year 2021 and beyond.

This disclosure is our first Modern Slavery statement, in compliance with jurisdictional legislation the UK Modern Slavery Act of 2015. It contains relevant foundational context as to our efforts to address forced labor, including modern slavery and human trafficking.

Our business and supply chains

As a trusted global transformation partner, Welo Global accelerates the global business journey by enabling brands and companies to reach, engage, and grow international audiences. Welo Global delivers multilingual content transformation services in translation, localization, and adaptation for over 250 languages with a growing network of over 77,000 in-country linguistic resources. Driving innovation in language services, Welo Global delivers high-quality training data transformation solutions for NLP-enabled machine learning by blending technology and human intelligence to collect, annotate, and evaluate all content types. Our people work across offices in North America, Europe, and Asia serving our global clients in the markets that matter to them.

- Global team of 1,900+
- Offices in North America, Europe and Asia
- Quality Certifications: ISO 9001:2015, ISO 13485, ISO 17100
- Accredited professional translators and interpreters for 250+ languages.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk assessment

We continually conduct risk assessments of our supply chain by considering:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labor and human rights groups

These assessments will determine our response and the risk controls that we implement.

Policies

Welo Global operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Whistleblowing Policy -** We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential on-line submission portal through ETHIX360 helpline to protect the identity of whistle-blowers.
- **Code of Ethics and Business Conduct -** Our code encourages employees to do the right thing by clearly stating the actions and behavior expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing our supply chain.

Supplier due diligence

Welo Global conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Annually auditing the suppliers, and their health and safety standards, labor relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labor
- Their employees work voluntarily and are entitled to leave work

- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness & Training

Welo Global has raised awareness of modern slavery issues by discussing in global forums and by sending regular emails that are focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

In addition to the awareness program, Welo Global will make available an online e-learning course to all employees and supplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organization
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organization
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps Welo Global will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by Welo Global anti-slavery policy

Measuring how we're performing

Welo Global has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organization and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many suppliers have rolled out an awareness and training program that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

- What are the findings of our cross-functional Enterprise Risk Management Team, which reviews how we are addressing modern slavery and human trafficking?

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