

## Introduction

The UK Modern Slavery Act 2015 (the “**Act**”) addresses modern slavery and human trafficking in internal and external supply chains, both in the UK and the rest of the world. Deloitte Asia Pacific Services Holdings Limited (“**DAPSHL**”) has a strong commitment to being a responsible business, and this statement provides details of how we operate and the steps we have taken to address and mitigate the risk of modern slavery and human trafficking in our supply chains or any part of our businesses during the financial year ended 31 May 2025.

## Background

DAPSHL is a UK private company limited by guarantee that provides services to its members together with its subsidiary, Deloitte Asia Pacific Services Limited, to further regional alignment, cooperation and consistent strategy execution amongst the members. Members of DAPSHL are Deloitte firms located in the Asia Pacific region, each of which are separate and independent legal entities. None of these legal entities can obligate or bind any other legal entity and are only liable for their own acts and omissions and not those of any other.

DAPSHL does not provide services to third party customers or clients.

As Deloitte Asia Pacific Services Limited is an entity incorporated in the Hong Kong Special Administrative Region of the People’s Republic of China it is not subject to the Act and this statement refers to DAPSHL alone.

## Steps we take within DAPSHL to address modern slavery and human trafficking

We review where our businesses and supply chains are most at risk of involving modern slavery and human trafficking. We have considered our existing controls and processes and their effectiveness in guarding against modern slavery and human trafficking in our own operations.

Directors and officers of DAPSHL are required to abide by the Global Principles of Business Conduct (the “**Global Code**”). The Global Code reflects a core belief that ethics and integrity are both fundamental and nonnegotiable elements of our professional lives and that human rights are respected. One of the Global Code’s key principles is maintaining a “Responsible supply chain” and not condoning any illegal or unethical behaviour by suppliers, contractors, or alliance partners.

Directors and officers of DAPSHL must confirm on an annual basis that they will adhere to the Global Code.

In addition to the above, directors and officers are expected to make decisions based on the following Shared Values:

- lead the way;
- serve with integrity;
- take care of each other;
- foster inclusion; and
- collaborate for measurable impact.

To support adherence to the Global Code and Shared Values, directors and officers also undertake ethics training (at onboarding; biennially thereafter) and receive communications designed to support their understanding of our expectations and promote ethical leadership.

Finally, we expect and actively encourage directors and officers to report any issues or concerns they may have about potential ethics violations directly to the Ethics and / or People and Purpose teams; via designated contacts or by using our third-party ethics helpline Deloitte Speak Up. This confidential and independently managed helpline is available by phone and through a secure website and allows

for anonymous reporting. The Asia Pacific Conduct Officer or their delegate responds to any enquiries and works along our People and Purpose and Legal leaders to investigate any reports arising from Deloitte Speak Up that concern DAPSHL.

### **Steps we take in our supply chain to address modern slavery and human trafficking**

We are entitled to receive services from certain entities within the Deloitte Network, including Deloitte Global Services Holdings Limited (“**DGSHL**”) and Deloitte Global Services Limited (“**DGSL**”). DGSL personnel are required to abide by the Global Code and the Deloitte Global Code of Ethics and Professional Conduct (“**Deloitte Global Code of Ethics**”).

The Deloitte Global Code of Ethics includes information on resources and guidance to enable DGSL personnel to make professional choices that are consistent with the Global Code. DGSL personnel must confirm on an annual basis that they will adhere to the Global Code and the Deloitte Global Code of Ethics and/or their member firm code of ethics when they provide services on behalf of the DGSL or its related entities.

#### *External supply chain*

DAPSHL contracts with external suppliers in extremely limited circumstances.

We have a Supplier Code of Conduct, to which our suppliers are required to adhere and we expect organisations with which we have business relationships to uphold our commitment to human rights. The Supplier Code of Conduct outlines minimum expectations of the efforts suppliers to any entity within the Deloitte network, including DAPSHL, should take to reduce the risk of modern slavery and human trafficking within their operations and supply chain. We provide suppliers with the Supplier Code of Conduct during the execution of a contract. The Supplier Code of Conduct is also publicly available on the Deloitte.com website and should be read alongside this Modern Slavery Act statement.

The Supplier Code of Conduct defines our expectations of suppliers, including treating workers with dignity and respect and not subjecting them to demeaning conditions. It includes, among other requirements, prohibitions against forced or involuntary labor; that work must be conducted based on freely agreed terms; that documents relating to workers' identity or immigration status may not be withheld or destroyed, concealed, confiscated or otherwise made inaccessible by the supplier; and that there be no exploitation of child labor or employment of workers under the age of 15 or the minimum legal working age, whichever is greater. Importantly, suppliers are expected to apply standards comparable to those set forth in the Supplier Code of Conduct in their own supply chains.

Any violation of the Deloitte Supplier Code of Conduct may result in asking the supplier to audit its own organization or its supply chain and to report on its findings; recommending or requiring corrective-action plans; or making the supplier a nonpreferred supplier. In some cases, such as where a supplier is found to materially violate laws relating to modern slavery or the fair treatment of workers, we would typically have the right to treat such violation as a material breach of the contract, and a right to terminate the relationship with that supplier. Reporting violations of the Supplier Code of Conduct is encouraged, and the Supplier Code of Conduct includes access to and information about our Ethics Officer, to enable the reporting of information directly to those individuals or through the Deloitte.com website.

### **Looking forward**

In the financial year to 31 May 2026, we will continue to monitor existing controls. We will also continue to carefully monitor our standards as well as the regulatory requirements and available guidance in this area.

This statement has been published in accordance with section 54 of the Act. It sets out the steps DAPSHL has taken to protect against slavery and human trafficking within its operations and within its supply chain. This statement applies to the financial year ending 31 May 2025.

This statement has been approved by the Board of Directors of DAPSHL.

Signed:

A handwritten signature in black ink, appearing to read 'Chris H'.