

# Modern Slavery Statement

## 1. Introduction

- Envoy Global, Inc. and its subsidiaries,<sup>1</sup> including Envoy Global United Kingdom Limited and Smith Stone Walters Limited, (collectively, “Envoy Global” or the “Company”) are committed to upholding the highest ethical, moral, and legal standards. In this Modern Slavery Statement, the Company describes how its business, policies, and practices ensure forms of modern slavery and human trafficking do not exist in its operations or supply chains. This statement is applicable to the Company and covers financial year 2025, which ends on December 31, 2025.
- The UK Modern Slavery Act 2015 requires certain companies to publish an annual statement that describes actions to prevent forms of modern slavery and human trafficking from taking place in their operations or supply chains.

## 2. About Envoy Global

- Envoy Global is a global immigration services provider with a mission to make it easier for people to work anywhere in the world. Envoy Global offers an immigration management platform that allows companies to hire and manage an international workforce. Envoy Global, Inc. is a Delaware corporation with its headquarters in Chicago, IL.

## 3. Risk Assessment

- Given the nature of the Company’s business, the Company assesses there to be a relatively low risk of modern slavery and human trafficking within its operations or supply chains.
- The Company’s internal policies and procedures ensure fair treatment of employees, who largely provide professional services to develop a technology platform and assist customers in hiring and managing employees around the world. In addition, the Company generally engages vendors and suppliers in low-risk sectors, such as information technology, human resources, and legal and other professional immigration services.

## 4. Policy on Modern Slavery

- The Company has a zero-tolerance policy to forms of modern slavery or human trafficking in any part of its operations or supply chains. Any issues suspected or identified in relation to such matters must be immediately reported to Envoy Global’s

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<sup>1</sup> Envoy India Holdings, Inc., Envoy Global India Private Limited, Envoy International Holdings, Inc., Envoy Global Immigration Pte. Ltd., Envoy Global United Kingdom Limited, Envoy Global France SAS, Envoy Global Canada Limited, Envoy Global Immigration FZ-LLC, Sesam Saudi Limited, Envoy Global B.V., Smith Stone Walters Limited, Smith Stone Walters (HK) Limited, Smith Stone Walters Pvt Limited, Smith Stone Walters GmbH, Envoy Global South Africa (Pty) Ltd, Envoy Global (KE) Ltd, and Envoy Global Namibia (Proprietary) Limited.

General Counsel. The Company will work promptly to resolve any such issues through legitimate and proportional measures.

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## 5. Procedure on Modern Slavery

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- To mitigate the risk of modern slavery and human trafficking in its operations and supply chains, the Company has implemented the following practices:
  - The Company maintains its Anti-Corruption and International Risk Compliance Policy, which requires due diligence on vendors to ensure they act ethically in business dealings;
  - The Company expects its vendors to abide by honest and ethical practices and requires their services to be provided in compliance with all applicable statutes, ordinances, laws, codes, rules, directives, requirements, and regulations;
  - The Company will periodically review all vendor engagements and overall risk profile to ensure consistent practice with its zero-tolerance policy toward modern slavery and human trafficking;
  - Employees are required to review an Employee Handbook, which explains the Company's employment policies and reflects people-first values;
  - Employees are required to attend a biannual compliance training, which includes a section on the Company's Modern Slavery Policy;
  - The Company has implemented systems to encourage whistleblowing; and
  - Company leadership scrupulously abides by the Company's compliance policies and procedures to set a positive tone at the top.

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## 6. Implementation

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- Envoy Global's General Counsel is responsible for implementing and monitoring progress of this and other related policies and their objectives.

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## 7. Board Approval

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- Envoy Global, Inc.'s Board has approved this statement.

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## 8. Signature

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- Envoy Global, Inc.'s President and Chief Executive Officer, Richard Burke, has signed this statement.