

Temu Consolidated Modern Slavery Statement 2026

1. Introduction

Temu is committed to preventing modern slavery in our business and supply chain. We expect the same commitment from our merchandise partners and service providers. This statement outlines our approach to this, including the steps we took to implement due diligence processes aimed at identifying, minimising, and eliminating the risks of modern slavery within our business operations and supply chains.

This statement is made on behalf of the following entities (collectively, the “**Reporting Entities**”):

- (a) Whaleco UK Limited, a London based company with company number 14476358 and its registered office at 5 Churchill Place, 10th Floor, London, United Kingdom, E14 5HU, in accordance with the requirements of the *United Kingdom Modern Slavery Act 2015*;
- (b) Whaleco Australia Pty Ltd, a company with Australian Business Number (ABN) 43 667 835 789 and its registered office located at PARRAMATTA NSW 2150, in accordance with the requirements of the *Australian Modern Slavery Act 2018 (Cth)*¹;
- (c) Whaleco Commerce Pty Ltd, a company with ABN 87 683 541 353 and its registered office located at PARRAMATTA NSW 2150, in accordance with the requirements of the *Australian Modern Slavery Act 2018 (Cth)*²;
- (d) Whaleco Canada Inc., a company with business number 796790210, in accordance with the requirements of the *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act S.C. 2023*;
- (e) Whaleco, Inc., in accordance with the requirements of the *California Transparency in Supply Chains Act of 2010*.

This statement covers the 2025 financial year, from 1 January 2025 to 31 December 2025 (the “**Reporting Period**”).

For the purposes of this statement, and with reference to internationally recognised standards³ and applicable laws and regulations, modern slavery includes trafficking in persons, slavery, servitude, forced labour, sexual exploitation, forced marriage, debt bondage, child labour and deceptive recruitment practices.

¹ Whaleco Australia Pty Ltd has prepared this statement on a voluntary basis for the Reporting Period under Section 6 of the Australian Modern Slavery Act 2018 (Cth).

² Whaleco Commerce Pty Ltd has prepared this statement on a voluntary basis for the Reporting Period under Section 6 of the Australian Modern Slavery Act 2018 (Cth).

³ ILO, Walk Free, IOM, 2022: [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage](#)

2. Operations and Supply Chains

Temu is an e-commerce company that connects consumers with millions of merchandise partners, driven by the mission to empower people to live a better life.

Temu is committed to offering affordable products and enabling both consumers and merchandise partners to pursue their dreams in an inclusive environment. Our platform encompasses a wide range of products produced and offered by, or sourced from merchandise partners. Temu does not produce any products listed on the platform.

Our supply chains primarily consist of (i) merchandise partners who supply products listed on the Temu platform (“**merchandise partners**”), and (ii) service providers who support our business operations, such as payment processors, advertising and marketing partners, lawyers, and accountants (“**service providers**”). Our supply chains also extend to the suppliers of both our merchandise partners and service providers.

3. Risks of Modern Slavery Practices and Governance

Our service providers, such as payment processors and advertising and marketing partners, provide services that are generally standardised and professional in nature and present a low risk of modern slavery. At the same time, given the broad range of products made available on our platform, we have implemented due diligence processes, vetting processes, and ongoing evaluations to prevent and address potential risks of modern slavery within our merchandise partners’ supply chains.

We recognise the importance of continuously improving our understanding and oversight of our supply chains through active engagement.

The measures we have implemented to identify, assess, and address modern slavery risks include:

- conducting regular reviews of our policies and procedures to ensure they remain relevant and effective;
- undertaking ongoing mapping of our supplier network to improve visibility and assess potential risks;
- applying onboarding assessments to evaluate modern slavery risks based on relevant risk factors;
- removing products that are identified as, or suspected of being, linked to modern slavery;
- providing mechanisms for our employees, merchandise partners, service providers and other stakeholders to provide feedback on our modern slavery initiatives; and

- offering learning resources to our employees, merchandise partners, service providers and other stakeholders to enhance their understanding of modern slavery risks and our ethical standards.

4. Our Policies

Our goal is for products and services offered on Temu to be achieved in a way that upholds and respects fundamental human rights. We maintain and will continue to develop policies aimed at preventing modern slavery and promoting ethical business practices. These policies set out the standards we expect from everyone doing business with Temu, including our merchandise partners and service providers.

The standards reflected in our policies are guided by internationally recognised human rights standards such as the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Universal Declaration of Human Rights (UDHR) and the core conventions of the International Labour Organisation (ILO). These standards include compliance with applicable labour laws, the prohibition of forced and child labour, the prohibition of sexual exploitation, the promotion of safe working conditions, and respect for human rights.

Our management-level team oversees the development and application of these policies, while specialised teams are responsible for their implementation and for monitoring compliance in day-to-day employee management and supply chain activities. These teams also identify areas where further guidance, training, or process enhancements are needed and support relevant updates and improvements to our existing practices.

In addition to the policies that set expectations for third parties, we have also taken steps within our own recruitment practices to combat modern slavery. Further details of our policies and practices are set out below.

Code of Conduct

Temu has established a Code of Conduct for merchandise partners, available on the Temu Seller Center, and a Third Party Code of Conduct applicable to all third parties doing business with Temu, accessible via Temu's consumer-facing website (together, the "CoC").

The CoC sets out clear expectations for respect of human rights. It prohibits the use of forced, penal, or child labour, and requires that all employment be freely chosen. The CoC further requires compliance with applicable laws on wages and working hours, respect for freedom of association and workers' rights to collective bargaining, and the maintenance of safe and respectful working environments. These standards form a key mechanism for mitigating the risk of modern slavery within our supply chains.

Human Rights Policy

In alignment with the CoC, Temu's Human Rights Policy expressly prohibits forced

labour, child labour, and abusive treatment. All parties doing business with Temu – including merchandise partners and service providers – are expected to adhere to these standards.

Together, the Human Rights Policy and CoC form an integrated framework to protect human rights and prevent modern slavery and human trafficking in our operations and supply chains.

Product Compliance Statement and Prohibited Product List

To further mitigate risks in our supply chains, our merchandise partners must agree to Temu’s product compliance statement before listing their products on the platform. This requires merchandise partners to ensure that their products and business practices comply with all applicable laws and regulations, including those prohibiting forced labour, child labour, and other unlawful or unethical practices.

Temu also maintains a prohibited product list, which sets out product categories that merchandise partners are not permitted to sell on the platform. This includes items that are prohibited by applicable laws or associated with illegal activities, including those produced through unethical practices. The prohibited product list is regularly reviewed and updated to reflect evolving legislation and ethical standards. Together with the CoC and Human Rights Policy, these measures form a comprehensive framework for setting clear expectations and promoting ethical practices among merchandise partners.

Ethical Recruitment Practices

At the same time, our recruitment practices ensure that all Temu employees are recruited through legal and ethical means. We verify the identity and right to work of all employees to prevent modern slavery and human trafficking within our operations. Employee safety, wellbeing and mental health are a priority, and we continually seek to enhance our practices to support employee care and protection.

Through this integrated framework – comprising the CoC, Human Rights Policy, product compliance statement, prohibited product list, and ethical recruitment practices – Temu is committed to respecting and promoting human rights across our operations and supply chains.

5. Our Due Diligence Processes and Risk Management

Due Diligence Processes

To prevent and address the risks of modern slavery within our merchandise partners’ supply chains, we have implemented due diligence processes, vetting processes, and ongoing evaluations. The flowchart below (Figure 1) illustrates these processes.

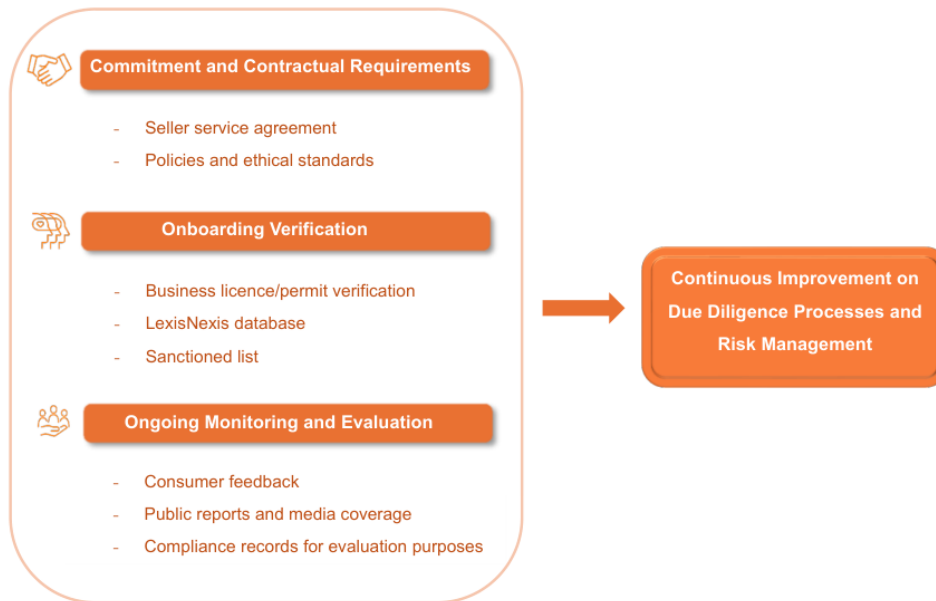


Figure 1

i. Commitment and Contractual Requirements

Merchandise partners are required to agree to our seller service agreement, as well as the relevant policies. These agreements require merchandise partners to represent that all products sold on the platform fully comply with applicable labour laws, regulations, and internationally recognised labour standards, including those addressing forced labour and child labour.

ii. Onboarding Verification

We implement strict control measures to ensure that only legitimate businesses operate on our platform. In general, the registration of merchandise partners starts with an identity verification process. Our dedicated team reviews and verifies business licences and relevant operational permits. All new merchandise partners go through vetting processes, including screening against the World Compliance database maintained by LexisNexis, which aggregates information from key global authorities. We block any merchandise partners that are found to be on the sanctioned list. Additionally, we apply further onboarding measures to assess potential risks based on relevant factors.

iii. Ongoing Monitoring and Evaluation

Merchandise partners undergo evaluations, which include the use of technological innovations to enhance our ability to detect and respond to modern slavery risks. After merchandise partners post product information on our platform, we conduct an initial review to identify potential issues and subject questionable products to further verification. Products associated with modern slavery risks may be restricted or removed from the platform. We also continuously monitor consumer feedback, public reports and media coverage to evaluate the compliance of our

merchandise partners with our policies. In addition, all parties doing business with Temu are expected to maintain appropriate compliance records and to cooperate, as reasonably requested, with our monitoring and evaluation activities.

Remediation

Where potential incidents of modern slavery are identified in connection with our operations or supply chains, we will take remediation or corrective actions as appropriate. Where such incidents are suspected or identified, the relevant products may be restricted or removed from the platform. In accordance with applicable agreements and policies, Temu may suspend or terminate business relationships with merchandise partners or service providers that are found to have acted inconsistently with our policies or applicable laws relating to modern slavery.

Whistleblower and Reporting Channel

We also provide a whistleblower and reporting channel that is easily accessible to everyone doing business with Temu. This secure and confidential mechanism enables the reporting of any concerns regarding unethical or illegal practices, including suspected modern slavery issues. Reports can be made anonymously and all concerns are thoroughly investigated.

6. Training and Awareness

We recognise the importance of raising awareness and providing training materials to enable our merchandise partners and service providers to identify and respond to modern slavery risks. We make these materials available to the relevant suppliers to enhance their understanding of modern slavery risks and our ethical standards.

For example, a learning module on worker rights and protections is available on the Temu Seller Center. Using hypothetical scenarios and practical analysis, this material introduces the key aspects of worker rights and protections and supports readers in identifying and addressing potential risks of forced labour, debt bondage, human trafficking, child labour, and gender-based exploitation within supply chains. To further strengthen understanding, the material includes mock questions for self-assessment. We also provide ongoing support and guidance to merchandise partners and service providers to ensure continuous improvement in their labour practices.

We actively participate in seminars focused on modern slavery issues to support awareness and knowledge sharing. For example, in February 2025, our employees participated in a seminar hosted by the University of Nottingham that examined modern slavery and child labour risks, including challenges associated with hidden and undocumented subcontracted worksites.

7. Measuring Effectiveness

We recognise the importance of continuously monitoring and strengthening both

our assessment of potential modern slavery risks and the measures we implement to address those risks.

We regularly review our policies and procedures to make sure our approach to preventing and addressing modern slavery remains relevant, effective, and appropriate. We work closely with leading international law firms to understand evolving legislation and regulatory expectations and to ensure our practices are aligned with those developments.

These reviews are conducted at least annually to ensure our policies and procedures are consistent with applicable legal requirements, regulatory guidance, and recognised best practices in preventing modern slavery.

We also evaluate the effectiveness of our due diligence processes and make improvements based on feedback and internal review results. Meanwhile, we provide mechanisms for employees, merchandise partners, service providers, and other stakeholders to provide feedback on our modern slavery initiatives. This feedback, which can be made anonymously, is used to identify areas for improvement and to ensure ongoing enhancement of our efforts to combat modern slavery across our operations and supply chains.

8. Our Goals

We are committed to continuous improvement in our efforts to combat modern slavery. Looking ahead to the next reporting period, we intend to further strengthen our efforts through the following actions:

- Targeted training and awareness: developing tailored training materials for our employees, merchandise partners, service providers, and other stakeholders to enhance understanding of modern slavery risks and effective mitigation measures;
- Collaboration and collective actions: engaging in independent cross-industry associations, non-governmental organisations, and other stakeholders to share knowledge, develop best practices, and participate in multi-stakeholder initiatives, drawing on our global footprint to support improvements in labour standards and human rights;
- External expertise: continuing to work with leading law firms, accounting firms, and consulting firms to inform our approach to labour standards, human rights due diligence, and responsible supply chain management, including by staying informed of relevant developments on sustainability and human rights reporting standards;
- Upgrade of monitoring system: continuing to enhance advanced technologies to improve risk identification, monitoring, and due diligence across our supply chains.

9. Consultation

Whaleco Australia Pty Ltd and Whaleco Commerce Pty Ltd do not own or control any other entities that they would need to consult with under section 16(1)(f) of the *Australian Modern Slavery Act 2018 (Cth)*.

10. Approval

This statement is submitted on behalf of Whaleco Australia Pty Ltd and Whaleco Commerce Pty Ltd. The principal governing bodies approving this statement on behalf of Whaleco Australia Pty Ltd and Whaleco Commerce Pty Ltd provide their approvals solely for those entities and do not extend their approvals to any part of the statement that related to any other entity.

This statement has been approved by the Board of Directors of Whaleco Australia Pty Ltd and signed by the Director of Whaleco Australia Pty Ltd on 18 May 2026.

This statement has been approved by the Board of Directors of Whaleco Commerce Pty Ltd and signed by the Director of Whaleco Commerce Pty Ltd on 18 May 2026.



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18 May 2026



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18 May 2026