



**FY24
Modern Slavery
Statement**

Introduction

We strive to make positive social impact in our communities and value this opportunity to provide our joint Modern Slavery Statement ("**Statement**") pursuant to the *Modern Slavery Act 2018* (Cth) ("**Act**").

We take our responsibility to [respect human rights](#) seriously and continue to review our efforts in this regard. We understand the importance of respecting human rights and the vital role it plays to ensure we continue to build and sustain trust among not only our employees, users, creators, advertisers, other stakeholders, but also for others who may engage with our companies. As part of our continued efforts, we strive to understand how we can better protect and respect human rights throughout our business and our supply chains.

Our philosophy is informed by several international human rights frameworks including: the International Bill of Human Rights (which includes: (i) the Universal Declaration of Human Rights; (ii) the International Covenant on Civil and Political Rights; and (iii) the International Covenant on Economic, Social and Cultural Rights); the International Labour Organisation Declaration on Fundamental Principles and Rights at Work; the Convention on the Rights of the Child; and the United Nations Guiding Principles on Business and Human Rights ("**UNGPs**").

About TikTok

TikTok is the world's leading destination for short-form mobile video and is home to a community of over 9.5 million Australian users and 350,000 Australian businesses. Our mission is to inspire creativity and bring joy.

1. Reporting Entities

This Statement is made under section 14 of the Act on behalf of:

- TikTok Australia Pty Ltd ("**TikTok Australia**");
- TikTok PTE. LTD. ("**TikTok Singapore**"); and
- ByteDance PTE. LTD. ("**ByteDance Singapore**"),

(together, the "**Reporting Entities**").

This Statement covers the Reporting Entities' reporting period of 1 January 2024 to 31 December 2024 ("**Reporting Period**").

2. Structure

Key details for the Reporting Entities are set out below.

Reporting Entity	Company Name and Number	Registered Office
TikTok Australia	TikTok Australia Pty Ltd (ACN 637 464 638)	Levels 18-21, 180 George Street, Sydney, New South Wales, Australia
TikTok Singapore	TikTok PTE. LTD. (ARBN 677 491 360)	1 Raffles Quay, #26-10, Singapore 048583
ByteDance Singapore	ByteDance PTE. LTD. (ARBN 660 019 198)	1 Raffles Quay, #26-10, Singapore 048583

TikTok Australia and TikTok Singapore are part of the TikTok global group of companies ("**TikTok Group**"), which is owned by TikTok Ltd. TikTok Ltd. is owned by ByteDance Ltd. ByteDance Singapore is also

ultimately owned by ByteDance Ltd. Details of our broader corporate structure are available at our website at: <https://www.bytedance.com/en/>

Each of the Reporting Entities owned and controlled other entities in the Reporting Period, as detailed further below.

3. Operations and Supply Chains

TikTok Australia

TikTok Australia is the entity through which the Australian business operates. TikTok Australia:

- sells advertising inventories, services and products on the TikTok platform in the Australian market;
- books TikTok advertising revenue contracts in Australia;
- employs all employees based in Australia;
- contracts with service providers who provide services to businesses in Australia;
- contracts with service providers who provide services to TikTok Australia; and
- provides software engineering services to TikTok Singapore, including software for developing and maintaining video transmission features, multimedia processing platforms, the global content safety ecosystem, and information security capabilities.

During the Reporting Period, TikTok Australia had a non-operational subsidiary in Australia.

TikTok Australia purchases goods and services from a wide range of suppliers and service providers. Where possible, TikTok Australia's suppliers are usually based in Australia and supply goods and services to TikTok Australia from within the country. These suppliers typically provide consulting, creator and production services, as well as marketing and event related services.

TikTok Australia's supply chains also relate to services and equipment that contribute to its operations. Services include waste management, cleaning, security, hospitality and transportation. TikTok Australia also purchases computing equipment, electronics such as smartphones, telecommunications and office equipment/supplies.

TikTok Singapore

TikTok Singapore is the global service provider and operator of the TikTok platform outside of the United States, European Economic Area, United Kingdom, and Switzerland. TikTok Singapore is responsible for the global operation and management of the TikTok app and website in these regions, including:

- facilitating the publication and dissemination of user-generated content;
- delivering advertising services across multiple international markets;
- supporting the development, operation and delivery of e-commerce functionalities on the TikTok Shop platform in select South East Asian territories;
- undertaking centralised research and development, product engineering, and technology infrastructure support;
- coordinating the implementation of group-level data protection, information security, trust and safety protocols; and
- overseeing certain global procurement activities and supplier relationships.

TikTok Singapore engages suppliers of enterprise technology, consulting, advertising, logistics, and operational services to support its platform and e-commerce features.

TikTok Singapore holds and manages a portfolio of subsidiaries and interests in entities incorporated across the Asia Pacific, Middle East, Eastern Europe and Central and South America to support the strategic and/or operational requirements of the business in specific jurisdictions.

The primary function of some of these subsidiaries is to support the regional delivery, localisation, and regulatory alignment of TikTok's core offerings - namely, its short-form and livestreaming social media platform and, in select markets, its integrated e-commerce marketplace, TikTok Shop. These entities are incorporated to facilitate and manage jurisdiction-specific functions that are integral to platform deployment, user engagement, and commercial enablement.

Their typical activities include content operations, product localisation and engineering support, sales and marketing initiatives, user growth, merchant onboarding, and trust and safety infrastructure. In e-commerce-enabled markets, these subsidiaries may also engage local service providers to support logistics and payment processing. The operational footprint of these subsidiaries reflects TikTok Singapore's broader strategy of maintaining agility in execution while ensuring adherence to the applicable legal, regulatory, and ethical standards in each jurisdiction of operation.

ByteDance Singapore

ByteDance Singapore acts as a regional headquarters and central management hub for the ByteDance group's international operations, including oversight of certain business, finance, procurement, compliance, and operational functions. In particular, ByteDance Singapore:

- supports the development, management and regional deployment of software platforms and digital applications used across various ByteDance business lines;
- provides strategic and administrative support across multiple business lines within the ByteDance group, including the TikTok platform;
- manages group-level internal functions such as finance, tax, internal audit, and human resources in the region;
- coordinates regional implementation of group-wide policies, including those relating to compliance, procurement, and risk management; and
- hosts certain shared service teams that provide operational and technical support to other ByteDance entities.

ByteDance Singapore enters commercial contracts with suppliers of professional services, cloud computing and IT infrastructure, consultancy, and other enterprise support services.

ByteDance Singapore plays an important internal role in supporting the establishment and oversight of operating subsidiaries across the Asia-Pacific and other international markets.

ByteDance Singapore holds and manages equity interests in certain strategic downstream subsidiaries that have been incorporated in various Asian jurisdictions to address local regulatory, operational, and commercial requirements. These subsidiaries are key in ensuring that ByteDance's business activities are aligned with applicable legal and compliance frameworks across markets to which they support the regional delivery of a diverse portfolio of ByteDance products and services, including short-form video platforms, enterprise productivity tools, e-commerce marketplaces, gaming content, and other technology solutions.

4. Assessment of Modern Slavery Risks

In preparing this Statement, we conducted a high-level scoping of modern slavery risks relevant to the direct supply chains and operations of the Reporting Entities. This exercise involved considering a selection of the direct suppliers to the Reporting Entities based on spend, and the locations of the Reporting Entities and their subsidiaries. It was informed by Walk Free's Global Slavery Index (2023) ("**Global Slavery Index**") and the Attorney-General's Department's Guidance for Reporting Entities on the Modern Slavery Act (2023) ("**Guidance for Reporting Entities**").

Through this exercise, we identified that our highest categories of supplier spend include purchasing certain goods and services in certain sectors and industries that are generally associated with elevated

levels of modern slavery risk. For example, security services, construction, catering, and IT equipment. We also identified that some of our suppliers are based in countries with higher levels of modern slavery prevalence (as ranked by the Global Slavery Index).

We also identified that there are varying levels of geographic risk associated with the Reporting Entities' subsidiaries. For example, TikTok Australia has a subsidiary in Australia, which we note is a jurisdiction that the Global Slavery Index ranks as having a relatively low level of modern slavery prevalence. TikTok Singapore and ByteDance Singapore have subsidiaries in various jurisdictions globally, some of which we acknowledge are in countries that the Global Slavery Index records as having higher levels of modern slavery prevalence.

We acknowledge that we are early in our journey towards a complete understanding of our modern slavery risks, particularly across the supply chains of the Reporting Entities' owned and controlled entities noting their complexity and volume. We look forward to developing our understanding in future reporting periods.

5. Actions taken to Assess and Address Modern Slavery Risks

Policies and guidelines

During the Reporting Period, we maintained the following policies and guidelines as part of our broader controls to assess and address modern slavery risk in our operations and supply chains.

Some of our policies apply globally, such as our Speak Up Policy and Business Partner Code of Conduct, while other policies are region-specific.

TikTok Australia's Modern Slavery Policy	<p>TikTok Australia's Modern Slavery Policy applies to all persons working for or on behalf of TikTok Australia in any capacity, including but not limited to employees, directors, officers, agency workers, contractors, consultants and any third-party representatives. It requires:</p> <ul style="list-style-type: none"> • all staff to remain alert to potential modern slavery risks in our operations and supply chains, and immediately report any suspected instances of modern slavery, • managers to ensure that any person who believes they are a victim of modern slavery (whether in our operations or supply chain) can make a complaint, have that grievance addressed, and if appropriate, remediated, and • business partners to take steps to rectify or mitigate any identified occurrence of modern slavery, whether actual or potential, and notify TikTok of the steps taken.
Business Partner Code of Conduct	<p>Our global Business Partner Code of Conduct sets our expected ethical business standards and responsibilities for any business partner of TikTok, including each of the Reporting Entities. Business partners covered by the Code of Conduct include all third parties, including but not limited to suppliers, service providers, agents, vendors and consultants who provide any kind of products or services or undertake any activity for or on behalf of the Reporting Entities. The standards and responsibilities cover areas of ethical business practices and compliance, labour and human rights, health and safety and the environment.</p> <p>We aim to continue developing and maintaining relationships with our business partners who share the goal of sustained commitment to upholding the principles of ethical integrity and compliance within their own business operations.</p> <p>In relation to modern slavery, forced or compulsory labour, and human trafficking, the Business Partner Code of Conduct states that our business partners must:</p>

	<ul style="list-style-type: none"> • not use child labour and have procedures to verify and ensure that no child labour is used; • not engage in any form of modern slavery, human trafficking or use forced, bonded, involuntary, or prison labour within their organisations or supply chains; • only use voluntary labour; • treat employees with utmost dignity and respect, and in accordance with applicable labour and employment laws, regulations and the standards in the Business Partner Code of Conduct; • recognise and respect the right of employees to freely and voluntarily establish and join unions or associations of their choice (or refrain from doing so), without any restrictions or consequences subject to compliance with local laws and allow their employees to collectively discuss and negotiate with management their grievances in relation to terms and conditions of work; • ensure their employee's working hours do not exceed legally mandated maximums; and • ensure that their employees are paid at least minimum wage, be paid overtime, and receive benefits, each as required by local laws.
TikTok Community Guidelines	<p>The TikTok Group maintains a set of Community Guidelines that include rules and standards for using TikTok. We remove any content found to violate our Community Guidelines on human trafficking and human smuggling and may ban offending accounts. Our advertising policies prohibit inappropriate or offensive content, including discrimination, harassment, and bullying.</p> <p>We also acknowledge how important it is for survivors of human trafficking and smuggling to share their stories, and we provide a space to do so on our platform in accordance with our Community Guidelines.</p> <p>TikTok Group entities report incidents of youth sex trafficking to the National Center for Missing and Exploited Children ("NCMEC"). We also report to relevant law enforcement authorities when there is a specific, credible, and imminent threat to human life or serious physical injury.</p>
Global Speak Up Policy	<p>We are committed to detecting and addressing misconduct and ensuring that those who become aware of misconduct can report it without being concerned that it will negatively affect them or their position. Further details of this policy are outlined below.</p>

Contractual arrangements

During the Reporting Period, we used the following contractual arrangements as part of our broader controls to address modern slavery risk in our operations and supply chains.

Contractual clauses	We include provisions in our supplier agreements to promote alignment with our standards and expectations. These agreements typically contain a binding obligation for suppliers to comply with our Business Partner Code of Conduct, which outlines expectations relating to labour practices, including the prohibition of child labour, forced or compulsory labour, modern slavery, and human trafficking. The agreements also typically include provisions allowing for suspension or termination in the event of non-compliance with these obligations, along with standard dispute resolution provisions.
TikTok Shop Seller Terms of Service	<p>In relation to the e-commerce operations of TikTok Singapore, the TikTok Shop Seller Terms of Service govern the use of the TikTok Shop to promote and sell goods by traders to users.</p> <p>TikTok Shop (not presently available in Australia) is an e-commerce platform, which mainly allows traders to offer products to users of the TikTok application.</p> <p>These Terms of Service require each trader to undertake that they comply with all applicable laws relating to anti-slavery and human trafficking. The Terms of Service also require each trader to provide representations and warranties in relation to compliance with those laws.</p> <p>The TikTok Shop Seller Terms of Service may vary and apply specifically to each local jurisdiction, with jurisdiction-specific terms incorporated accordingly.</p>

Our People and Culture

The prevention, detection and reporting of modern slavery in every part of our organisation or supply chain is a collective responsibility across our business and of all those working on our behalf. In accordance with this philosophy, we maintain the following policies and mechanisms.

Code of Conduct	<p>Our Code of Conduct applies globally and must be observed by all regular employees, senior management and directors of the Reporting Entities. We also require our extended workforce (such as independent contractors and third party associates) to comply with the Code of Conduct. This Code:</p> <ul style="list-style-type: none"> • prohibits child labour, forced or compulsory labour, and other illegal employment within our organisation or supply chain; • commits to providing a workplace free from discrimination or harassment; and • refers to our Environment Health and Safety ("EHS") program and states we take appropriate measures to provide a safe and healthy workplace. <p>Our Code of Conduct addresses additional areas, including equal employment opportunities, anti-corruption, anti-bribery and corporate social responsibility, which support our commitment to addressing modern slavery risk.</p>
Global Speak Up Policy and Hotline	Our Global Speak Up Policy and Speak Up hotline together provide a platform for employees and business partners, who suspect or become aware of modern slavery in our business or supply chains, to report it to our Ethics and Compliance teams. The Policy prohibits retaliation against anyone that reports an issue or participates in an

	<p>investigation, and our Speak Up processes and policies are regularly reviewed for enhancements.</p> <p>Our Speak Up culture is communicated to our employees in various ways. For example, mandatory training on the Speak Up hotline occurs at employee onboarding. Further training and awareness campaigns, such as Speak Up Awareness Sessions, occur on a continuing basis for employees across the Reporting Entities to refresh their knowledge about our Speak Up processes and how to raise any concerns.</p>
Employment Policies and Procedures	<p>We ask all our employees to be respectful, to act with integrity and to ensure our workplace is a safe place to work. We also have a global Non-Discrimination and Anti-Harassment Policy that outlines our expectations for how employees should engage with and treat one another.</p> <p>Our Global Recruitment Procedure sets out key steps for our recruitment and selection process and the standards of conduct which all staff must follow. We are committed to acquiring our talent in an equitable, efficient and consistent manner.</p> <p>Our commitment to providing employees with a healthy, safe and environmentally friendly workplace is further realised through the implementation of our EHS Management programme. This program includes risk assessments, regular audits and inspections. The EHS team regularly monitors legal requirements and industry best practices, providing all of our operations with continuous advice and guidance on health and safety aspects.</p>

Remediation and due diligence

Our Global Speak Up Policy and Speak Up hotline together provide a platform for suspected instances of modern slavery to be reported and investigated.

Our global Speak Up process provides a platform for suspected instances of modern slavery or other violations of our codes of conduct to be reported and investigated. In line with our values and commitments, reported concerns and violations would be addressed in a timely manner and in an appropriate way.

Where meaningful progress cannot be achieved, the Reporting Entities may take reasonable steps to evaluate the appropriateness of discontinuing the relationship with the relevant supplier or sub-supplier, while taking into consideration the potential human rights implications of such a decision.

Training

We acknowledge it is important to consider cross-functional areas of compliance when taking actions to assess and address modern slavery risks.

All employees of the Reporting Entities are required to complete various e-learning modules, including on Speak Up, Non-Discrimination & Anti-Harassment, Anti-Bribery and Anti-Corruption, and Anti-Money Laundering.

During the reporting period, TikTok Australia conducted modern slavery-related training for staff working in connection with the Australian business and intend to run this training again in 2025, with a view to expanding this training across the Reporting Entities. The topics covered include:

- an explanation of the types of conduct and practices encompassed by the term "modern slavery" and industry specific examples of how and where modern slavery could occur in TikTok Australia's operations and supply chains;

- how to detect instances of modern slavery and what to do when an instance of modern slavery (or a risk of modern slavery) is detected; and
- a detailed explanation of the key provisions of TikTok Australia's Modern Slavery Policy.

Collaboration

TikTok strives to progress cross-industry collaborations with the aim to combat modern slavery, by working with members and organisations in its global community.

This includes:

- continuing our membership, as a global ByteDance effort, in [BSR's](#) human rights and ESG reporting collaborative initiatives. BSR is a global non-profit organisation that seeks to advance cross-industry progress to create a more just and sustainable world, including with respect to human rights. The human rights working group aims to implement the UNGPs across all industries. We regularly participate in working group meetings and we have engaged with BSR on modern slavery-related topics;
- in 2024, we joined [Tech Against Trafficking](#), a collaboration of BSR which brings together companies to combat human trafficking in company operations and supply chains; and
- we take the responsibility of keeping our community safe seriously. For example, we maintain a set of [Community Guidelines](#) that include rules and standards for using TikTok. We remove any content found to violate our Community Guidelines on [human trafficking and human smuggling](#) and may ban offending accounts. Our [advertising policies prohibit inappropriate or offensive content](#), including discrimination, harassment, and bullying.

6. Effectiveness of action taken to address modern slavery

During the Reporting Period, we monitored the effectiveness of our assessment of potential modern slavery risks and actions we take to address such risks in the following ways.

Training	Monitoring the completion rates of mandatory training by our employees to increase the awareness and effectiveness of our internal policies as stated above.
Internal consultation	We seek feedback from relevant business teams from time to time on the effectiveness of our policies and processes for managing operational and supply chain risks, including those that may intersect with modern slavery-related concerns. Input from the business may also be obtained where material developments arise that could affect our internal controls, for example, changes to employment practices, workplace policies, or applicable local laws. Where appropriate, our Human Resources, Ethics Office, Legal, and other relevant functions may be consulted to support updates to relevant frameworks.
Policies and Procedures	We generally monitor and assess compliance with our internal policies and procedures across the Reporting Entities. Responsibility for each type of control is allocated across different teams, which each adopt appropriate forms of tracking compliance.

7. Consultation

This statement was prepared in consultation and collaboration with cross-functional teams across each of the Reporting Entities, who also have relevant oversight of the Reporting Entities' subsidiaries. We also engaged with senior leaders within each of the Reporting Entities in the development of this statement.

8. Approval and signature

This Statement was approved by the Board of each of the Reporting Entities, being the relevant principal governing body of each Reporting Entity. It is signed by the Directors of each of those Boards, as a relevant responsible member.

Simon Bates
Director, TikTok Australia Pty Ltd
 Date: 21 June 2025

Brett Armstrong
Director, TikTok Australia Pty Ltd
 Date: 21 June 2025

Choi Se Hee
Director, TikTok PTE. LTD.
 Date: 21 June 2025

Hua Wei
Director, TikTok PTE. LTD.
 Date: 21 June 2025

Hong Dingkun
Director, Bytedance PTE. LTD.
 Date: 21 June 2025

9. Mandatory criteria

The table below indicates the pages of this Statement that addresses each of the mandatory criteria in section 16 of the Act.

Mandatory criteria	Page
Identify the reporting entity.	1
Describe the reporting entity's structure, operations and supply chains.	1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	4
Describe how the reporting entity assesses the effectiveness of these actions.	8
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	8
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	various

