

Introduction

We strive to make positive social impact in our communities and value this opportunity to provide our 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, 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.

1. Reporting Entity

This Statement is made under section 14 of the Act by ByteDance PTE. LTD. (ARBN 660 019 198) of 1 Raffles Quay, #26-10, Singapore 048583 ("**Reporting Entity**"). This Statement covers the Reporting Entity's reporting period of 1 January 2023 to 31 December 2023 ("**Reporting Period**").

The Reporting Entity is ultimately owned by ByteDance Ltd and owned and controlled other entities in the Reporting Period, as detailed further below. Details of our broader corporate structure are available at our website at: <https://www.bytedance.com/en/>

2. Operations and Supply Chains

The Reporting Entity 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, the Reporting Entity:

- 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.

The Reporting Entity enters commercial contracts with suppliers of professional services, cloud computing and IT infrastructure, consultancy, and other enterprise support services. The Reporting Entity plays an important internal role in supporting the establishment and oversight of operating subsidiaries across the Asia-Pacific and other international markets.

The Reporting Entity holds and manages equity interests in certain strategic downstream subsidiaries that have been incorporated in certain 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.

3. Description of Modern Slavery Risks

In preparing this Statement, the Reporting Entity considered its highest categories of supplier spend, which include the purchasing certain goods in certain sectors and industries that are generally associated with elevated levels of modern slavery risk. For example, computer hardware, IT, and telecommunications-related purchases. However, the suppliers are located in jurisdictions with relatively lower levels of modern slavery prevalence, as ranked by Walk Free’s Global Slavery Index (2023) (“**Global Slavery Index**”).

In preparing this Statement, the Reporting Entity also considered the location of its owned and controlled entities against the modern slavery prevalence ratings of the Global Slavery Index. We identified that the Reporting Entity has subsidiaries in some jurisdictions that the Global Slavery Index records as having elevated levels of modern slavery risk.

We acknowledge that we are early in our journey towards a complete understanding of our modern slavery risks. We look forward to developing our understanding in future reporting periods.

4. 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.

Business Partner Code of Conduct	Our global Business Partner Code of Conduct sets our expected ethical business standards and responsibilities for any business partner of the Reporting Entity. 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 Entity. The standards and responsibilities cover areas of ethical business practices and compliance, labour and human rights, health and safety and the environment. 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.
---	--

	In relation to modern slavery, forced or compulsory labour, and human trafficking, the Business Partner Code of Conduct states that our business partners must: • 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, 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.
Global Speak Up Policy	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.

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.
----------------------------	---

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	Our Code of Conduct applies globally and must be observed by all regular employees, senior management and directors of the Reporting Entity. We also require our extended workforce (such as independent contractors and third party associates) to comply with the Code of Conduct. This Code: • 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. 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.
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 investigation, and our Speak Up processes and policies are regularly reviewed for enhancements. 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 Entity to refresh their knowledge about our Speak Up processes and how to raise any concerns.
Employment Policies and Procedures	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. 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. 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.
--	--

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 Entity 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.

Employees of the Reporting Entity are required to complete various e-learning modules, including on Speak Up, Non-Discrimination & Anti-Harassment, and Anti-Bribery and Anti-Corruption.

5. 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.

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 Entity. Responsibility for each type of control is

allocated across different teams, which each adopt appropriate forms of tracking compliance.

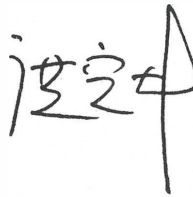
6. Consultation

This Statement was prepared in consultation and collaboration with cross-functional teams across the Reporting Entity, who also have relevant oversight of the Reporting Entity's subsidiaries.

7. Approval and signature

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

Hong Dingkun
Director, Bytedance PTE. LTD.
Date: 1 September 2025



8. 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.	2
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.	2
Describe how the reporting entity assesses the effectiveness of these actions.	5
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).	6
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	6