

Organization Structure

Appen Limited is an Australian incorporated holding company, listed on the Australian Securities Exchange (ASX: APX), and serves as the ultimate parent company for the Appen group of companies. The Appen Group operates globally, with subsidiaries in Australia, the United Kingdom, Ireland, the United States, China, Japan, South Korea, Hong Kong, India, Canada, Vietnam, Malaysia, Singapore and the Philippines.

Modern Slavery

We diligently consider human rights and labour risks associated with our business, actively working to understand and manage the potential risks of modern slavery and human rights abuses within our supply chain. Our Global Ethical Sourcing and Modern Slavery Policy (Policy) outlines expectations for both our suppliers and ourselves, emphasizing principles such as no forced labour, fair employment practices, working hours and conditions, freedom of association, freedom from discrimination and harassment, and whistleblower protections. The Policy is publicly available on our website and accessible to all, including our suppliers.

In compliance with the Australian Commonwealth Modern Slavery Act 2018 and the United Kingdom's Modern Slavery Act 2015, this statement reflects the Appen Group's progress during the financial year ending on December 31, 2025 (FY25).

About Appen

Appen specializes in making AI work in the real world by delivering high-quality training data at scale. We work with the world's largest technology companies, global leaders in automotive, financial services, retail, healthcare, and government agencies. Appen leads in the development of high-quality, human-annotated datasets for machine learning and artificial intelligence, collected, classified, translated, reviewed, and labelled by our global crowd of over 1 million skilled contractors, proficient in 500 languages, and working in over 200 countries and territories.

Approach to Governance

Our governance policies align with the 4th edition of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations and we are preparing to meet the requirements for the 5th edition. We regularly review our governance practices, ensuring accountability for both the Board and senior management. The Board operates under a formal Charter, defining its functions and delegating responsibilities to Board Committees and senior management. The Board oversees leadership, defines the company's purpose, sets strategic objectives, and approves values, including the Code of Conduct, Anti-Corruption and Anti-Bribery Policy, Diversity Policy, and the ASX Corporate Governance Statement.

Two standing Committees, the Board Audit and Risk Management Committee and the People and Culture Committee, assist in executing these responsibilities.

Risk Management Framework

Our risk management approach encourages innovation while analysing potential risks and identifying mitigation strategies. Risk management is a collective responsibility integrated into day-to-day operations. Our defined risk appetite, along with an embedded risk management framework, guides the types and levels of risks aligned with our overall business strategy. We find the risk of modern slavery in our global operations and supply chain to be relatively low, considering the nature and locations of our suppliers, the goods and services acquired, and the technical complexity of our business.

Assessment of Risk

Our assessment considers the relatively low risk of modern slavery in our global operations and supply chain. The majority of our supply chain involves crowd workers, with over 1 million skilled contractors operating independently in various countries. Additionally, our focus extends to software development and IT, facilities, marketing, and professional and financial services. We believe the secure nature of our facilities and the high qualifications of our workforce mitigate the risk of modern slavery.

Key Focus Areas – Facilities and Crowd

Based on information from the Global Slavery Index, our higher-risk facilities are identified in countries such as the Republic of the Philippines, People's Republic of China, India, and potentially Vietnam. Ongoing corporate oversight and the nature of our operations in these locations contribute to our belief that the risk exposure is minimal.

For crowd workers, we prioritize their welfare through the adoption of the Crowd Code of Ethics. Emphasizing fair pay, inclusion, privacy, and communication, this Code aligns with our commitment to responsible and sustainable labour and supply chain practices.

Whistleblower and Speak Up Policy

Our Whistleblower and Speak Up Policy (WhSUP Policy) covers both employees and crowd contractors, providing a safe process to report concerns about illegal or unethical conduct, including those related to modern slavery. The WhSUP Policy is available on our website, offering anonymous reporting through a third-party service and ensuring a confidential investigation process.

Training

Our compliance training, including onboarding and annual refresher training, emphasizes ethical conduct and adherence to policies such as the Code of Conduct, Anti-Corruption and Anti-Bribery, Whistleblower and Speak Up Policy, and Modern Slavery. This training fosters a culture of ethical behaviour and helps mitigate the risk of modern slavery within the Appen Group.

Contracts

Our standard crowd independent contractor agreement includes language requiring compliance with all applicable laws, including modern slavery and human trafficking laws. Additionally, we incorporate modern slavery terms into material supply contracts and validate suppliers' modern slavery prevention programs.

Assessment of Effectiveness

While we believe we have established the initial foundation to assess and mitigate modern slavery risks, we acknowledge that more work remains. Continuous improvement is a priority, and we will focus on areas likely to have the greatest impact within our risk management framework.

Consultation with Reporting Entities

All companies within the Appen Group, directly or indirectly owned by Appen Limited, operate as an integrated business with a centralized leadership team. The Appen Group leadership team was consulted on the development and adoption of the Policy, demonstrating full support for the anti-modern slavery program.

Future

Our future initiatives include developing a supplier due diligence program within our risk management framework. This program will focus on screening and auditing suppliers, labour certifications, and compliance tracking. We aim to increase employee awareness of relevant company policies, emphasizing their responsibility to identify potential breaches of the Policy. Continuous improvement is crucial, and we will prioritize risks to have the greatest impact.

Approval

This statement is approved by the Board of Directors of Appen Limited on behalf of Appen Limited and the wider Appen Group.

24 February 2026

A handwritten signature in black ink, appearing to read 'R Kolln', written in a cursive style.

Ryan Kolln
CEO/Managing Director