



## MODERN SLAVERY STATEMENT (AMENDMENT NO. 1)<sup>1</sup> FINANCIAL YEAR 1 MARCH 2024 TO 28 FEBRUARY 2025

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### 1. Scope of this Statement

This statement is made by **Secretlab SG Pte Ltd** pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act and Australia's Modern Slavery Act and by **Secretlab US, Inc.** pursuant to California's Transparency in Supply Chains Act. We have set out how our statement complies with each of the reporting criteria at Appendix 1 to this statement.

This statement pertains to activities taken from 1 March 2024 to 28 February 2025 and will be reviewed on an annual basis.

### 2. Our Commitment

We believe that ethical and socially responsible business practices are fundamental to our operations. We maintain a zero-tolerance policy for modern slavery, forced labour, and child labour throughout our operations and supply chains. We are committed to partnering only with those who share our dedication to fair labour practices.

### 3. Structure, Operations and Supply Chain

Secretlab SG Pte Ltd (UEN No. 201506443C) is a company incorporated in Singapore with its registered business address at 351 Braddell Road #05-02 Singapore 579713. Secretlab US, Inc. (Registration Number 6203316) is a wholly-owned subsidiary of Secretlab SG Pte Ltd (collectively, "**Secretlab**", "**we**" or "**our**"), and is a company incorporated in Delaware, USA with its registered business address at 8 The Green, Suite B, Dover, Delaware 19901, USA. We are headquartered in Singapore, where the majority of our employees are based.

Secretlab designs, manufactures, imports and sells its products in over 50 countries worldwide, including but not limited to the United States of America, Canada, Australia, New Zealand, the United Kingdom, Europe, Japan, Korea, Malaysia, Indonesia, Thailand, Philippines and the UAE. Our products encompass furniture, furniture components and parts, accessories and ancillary items.

We operate on a direct-to-consumer business model.

Within our supply chain, Secretlab SG Pte Ltd is the sole purchaser of goods from our manufacturers. We work with contract manufacturers to manufacture products according to our designs and specifications. We also engage logistics partners to handle the delivery of our products to our customers.

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<sup>1</sup> Please note that this Statement has been revised on 17 December 2025 to include details of approval by the principal governing body of the entity as required under Section 13(2) of the Modern Slavery Act 2018.

#### 4. Risks of Modern Slavery Practices in our Operations and Supply Chains

Secretlab adopts a multi-faceted approach in determining the risks of modern slavery practices in our operations and supply chains:

- (a) Geographic risk assessment: We are headquartered in Singapore, where the majority of our employees are based. The cities where our employees are located do not carry a high risk of forced or child labour. Furthermore, we adhere strictly to local labour regulations and have robust policies in place to create a safe, ethical and compliant working environment for all of our employees. These policies are elaborated on in the next section below. Similarly, our manufacturing facilities are located in regions which do not carry a high risk of forced or child labour.
- (b) Manufacturer risk assessment: Our focus on premium, quality products leads us to form strategic, long-term partnerships with reputable, well-established manufacturers who possess the necessary expertise, infrastructure and skilled workforce to produce products which meet our exacting quality standards. These manufacturers operate with higher ethical standards and compliance frameworks, as they are invested in maintaining their reputation and long-term business relationships. In addition, the premium nature of our products allows for sustainable pricing structures that do not exert undue pressure on our manufacturers to cut corners on labour costs. This approach in turn enables our manufacturers to provide fair wages, benefits and working conditions for their employees.

In the circumstances, Secretlab believes that the risk of modern slavery practices in our operations and supply chains is low.

Notwithstanding this, we intend to conduct more in-depth supply chain mapping and to conduct more comprehensive due diligence on our manufacturers in the next financial year, to better identify potential areas of risk.

#### 5. Actions Taken To Address Modern Slavery Risks

##### Internal Policies

Secretlab has an Anti-Slavery and Human Trafficking Policy (the “**Anti-Slavery Policy**”) that all our employees are expected to abide by. Among other things, our employees are expected to, and encouraged, to raise their concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any manufacturer tier at the earliest possible stage. Our Anti-Slavery Policy also encourages openness and expressly states that Secretlab will support anyone who raises genuine concerns in good faith under the policy, even if they turn out to be mistaken. We are also committed to ensuring that no one suffers any detrimental treatment as a result of reporting their suspicions in good faith.

Any employee who breaches our Anti-Slavery Policy will face disciplinary action, which may result in dismissal for misconduct. We may also terminate our relationships with other individuals and organisations working on our behalf if they breach our Anti-Slavery Policy.

This is coupled together with our Workplace Safety and Health Policy, which sets out our commitment to providing a safe and healthy working environment for all of our employees and contractors.

In addition, we also have a Whistleblowing Policy, which encourages and obliges our employees to report any illegal, dishonest, unethical conduct, or conduct that is not in line with our company’s values and principles (“**Reportable Conduct**”). We permit whistleblowers to report such Reportable Conduct on an anonymous basis and will respect their wishes for confidentiality. We strictly prohibit any retaliation against whistleblowers.

## External Policies

Secretlab requires that all of our key manufacturers ("Manufacturers") abide by our Manufacturer Code of Conduct in our contracts with them. In doing so, our Manufacturers certify that they comply with all applicable laws and regulations, and that they do not support or engage in modern slavery practices.

Our Manufacturer Code of Conduct provides that:

- (a) Our Manufacturers and their partners do not support or engage in human trafficking, bonded, indentured, compelled, involuntary unpaid or forced prison labour or child labour;
- (b) Our Manufacturers must not force their employees to lodge deposits or their identity papers with them;
- (c) Our Manufacturers shall not unnecessarily impede employees' freedom of movement;
- (d) Our Manufacturers shall implement and maintain a reliable system to verify and keep records of the eligibility of all employees, including age eligibility and legal status of foreign employees;
- (e) Our Manufacturers must not hire any person below 15 years of age, the local legal minimum age, or the age of completing compulsory education, whichever is highest;
- (f) Manufacturers that employ young persons who do not fall within the local legal definition of "children" must comply with all laws and regulations that apply to the employment and treatment of such persons;
- (g) Our Manufacturers shall not support or engage in or require any hazardous labour to be performed by any person under the age of 18;
- (h) Our Manufacturers shall pay their employees at least the legally mandated minimum wage (whether based on hourly or piece rate), premium overtime rate and any other elements of compensation; and
- (i) Our Manufacturers must comply with all legally mandated limits on hours worked and working hours shall not be excessive.

We reserve the right to audit our Manufacturers in our contracts, which include permitting Secretlab or its authorised representatives to make unannounced on-site inspections of our Manufacturers' facilities and employer-provided housing, to review their books and records and conduct private interviews.

Secretlab provides a channel for our Manufacturers to submit their questions and comments regarding our Manufacturer Code of Conduct.

We require our Manufacturers to communicate our Manufacturer Code of Conduct to their employees, and if requested, to post a copy of our Code of Conduct in their local language.

We also provide a channel for reporting breaches of our Manufacturer Code of Conduct. We have a non-retaliation policy to ensure that no retaliation or disciplinary action is taken against those who have submitted reports in good faith.

We mandate that our Manufacturers must have written commitments from each of their partners that each partner will comply with our Manufacturer Code of Conduct. We also reserve the right to inspect and audit our Manufacturers' partners to ensure their compliance.

In the next financial year, we intend to provide training to our management and key employees with direct responsibility for supply chain sourcing, on human trafficking and modern slavery.

## Accountability from our Manufacturers

Should Secretlab become aware of breaches by our Manufacturers of our Manufacturer Code of Conduct, we reserve the right to demand corrective measures or to terminate the contract with the errant Manufacturer, depending on the nature of the breach and its severity.

### **6. Assessment of Effectiveness of Actions Taken**

Our Procurement, Legal & Compliance and Human Resources teams work together to minimise the risk of modern slavery in our supply chains and operations.

We assess the effectiveness of our actions through periodic visits to our Manufacturers' factories, and monitoring the reporting channels for any complaints or grievances.

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and supply chains is in its nascent stage. We will continue to build up our capability to assess the effectiveness of our actions taken.

### **7. Process of Consultation with Entities Owned or Controlled by Secretlab**

In preparing this statement, we have consulted with the other entities owned by Secretlab SG Pte Ltd.

### **8. Remediation Measures**

As far as we are aware, there is no evidence of instances of forced labour or child labour in our activities and supply chains. Remediation measures have therefore not been taken.

We are however committed to taking remediation measures if instances of forced labour or child labour are found in our activities and supply chains.

### **9. Remediation of Loss of Income**

As far as we are aware, there is no evidence that vulnerable families have experienced a loss of income as a result of the steps that we have taken to eliminate forced labour or child labour risks. No remediation steps have therefore been taken in this regard.

We are however committed to taking remediation measures if it comes to our attention that vulnerable families have experienced loss of income.



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Ian Alexander Ang

Director, President and Chief Executive Officer of Secretlab US, Inc.

30 May 2025

**Attestation required under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act**

In accordance with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I, in the capacity of Chief Executive Officer and Director of Secretlab SG Pte Ltd, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this statement is true, accurate and complete in all material respects for the reporting year listed within this statement.

I have the authority to bind Secretlab SG Pte Ltd.



Ian Alexander Ang


Chief Executive Officer and Director of Secretlab SG Pte Ltd

30 May 2025

## Approval required under the Modern Slavery Act 2018

In accordance with the requirements under the Modern Slavery Act 2018, and in particular section 13(2) thereof, I, in the capacity of Chief Executive Officer and Director of Secretlab SG Pte Ltd, attest that this statement was approved by the board of Secretlab SG Pte Ltd in their capacity as principal governing body of Secretlab SG Pte Ltd on 30 May 2025.

I have the authority to bind Secretlab SG Pte Ltd.



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Ian Alexander Ang

Chief Executive Officer and Director of Secretlab SG Pte Ltd

17 December 2025

**Appendix 1: How our statement addresses the Canadian, Australian and Californian reporting criteria**

<b>Australia's reporting criteria</b>	<b>References in this statement</b>
Identify the reporting entity	Section 1
Describe the reporting entity's structure, operations and supply chains	Section 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 4
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	Sections 4, 5, 8 and 9
Describe how the reporting entity assesses the effectiveness of these actions	Section 6
Describe the process of consultation with any entities the reporting entity owns or controls	Section 7
Provide any other relevant information	N.A.

<b>Canada's reporting criteria</b>	<b>References in this statement</b>
Entity's structure, activities and supply chains	Section 3
Entity's policies and due diligence processes in relation to forced labour and child labour	Section 5
The parts of the entity's business and supply chains that carry a risk of forced labour or child labour being used, and the steps it has taken to assess and manage that risk	Sections 4 and 5
Any measures taken to remediate any forced labour or child labour	Section 8
Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains	Section 9
Training provided to employees on forced labour and child labour	Section 5
How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	Section 6

California's reporting criteria	References in this statement
Verification	Sections 4 and 5
Audit	Sections 5 and 6
Certification	Section 5
Internal accountability	Section 5
Training	Section 5