

Payscale 2025 Modern Slavery Statement

This Payscale 2025 Modern Slavery Statement (“Statement”) is issued pursuant to Section 54 of the UK Modern Slavery Act 2015 (“the Act”) and covers the calendar year ending **31 December 2024**. It applies to Payscale, Inc. and all affiliated entities operating within the United Kingdom and internationally (collectively, “Payscale”).

Payscale is committed to maintaining the highest standards of ethical conduct and responsible business practices. We are firmly opposed to all forms of modern slavery, including forced labor, child labor, bonded labor, and human trafficking. This Statement outlines the actions we have taken and the systems we have implemented to ensure that modern slavery is not taking place in any part of our operations or supply chain.

A. Our Business Model

Payscale is a leading global provider of compensation management software and services. Our platform supports HR professionals and businesses by delivering real-time compensation insights, equity analytics, and pay strategy tools. We serve over 10,000 customers across a wide range of industries globally.

Payscale operates in the United Kingdom, North America, Europe, and Asia. Our global workforce comprises approximately 700 employees. As a software-as-a-service (SaaS) company, our direct supply chain consists primarily of software vendors, professional service providers, IT infrastructure suppliers, office leasing providers, and HR recruiting partners.

B. Risk Assessment

Payscale recognizes that modern slavery risks may arise in two main areas:

1. **Our Supply Chain** – including technology vendors and other partners, especially in higher-risk jurisdictions.
2. **Our Internal Operations** – through recruitment practices, third-party staffing, and indirect services.

We have conducted an internal review to identify high-risk suppliers based on geographic location, industry, and the nature of the goods/services provided. We review risks annually to guide due diligence, and as a part of contract engagement strategies.

C. Governance and Policies

Payscale has developed a governance framework to manage ethical and legal compliance across our business. Our key policies include:

- **Modern Slavery and Human Trafficking Policy**
- **Code of Business Conduct and Ethics**
- **Anti-Corruption and Bribery Policy**
- **Whistleblower Policy**

All Payscale team members, contractors, and suppliers are required to comply with these policies. We do not tolerate violations and reserve the right to suspend or terminate relationships with any party found to be complicit in modern slavery.

D. Supplier and Vendor Controls

Our supply chain due diligence includes:

- Screening all third-party vendors using a third-party **compliance risk tool**.
- Including **anti-slavery provisions** in our standard supplier contracts.
- Reviewing or **auditing employment practices** from select suppliers in identified higher-risk areas.

E. Recruitment and Employment Standards

Payscale adheres to ethical labor practices across all global offices. Specifically:

- All Payscale employees have written contracts of employment where applicable, and are advised of their protections and rights via the Payscale Employee Handbook.
- No employees are required to pay fees to secure employment.
- Right-to-work documentation is collected and verified before employment begins.
- All UK-based staff are paid at least the **London Living Wage** (pro-rata for part-time roles).

- Payscale conducts due diligence on third-party recruitment firms to ensure compliance with applicable laws and ethical sourcing practices.
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F. Training and Awareness

To build awareness and promote early detection:

- **Mandatory training** on employment practices behavior is provided to all employees, with additional communication on responsibilities for procurement and HR teams.
 - Resources on identifying and reporting suspected forced labor are included in our Employee Handbook.
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G. Reporting Mechanisms

Employees and external stakeholders may report concerns of modern slavery via:

- A **confidential third-party whistleblower hotline**
- An **anonymous online reporting tool**
- Direct communication with **Legal, HR, or Compliance leadership**

All reports are investigated by our Compliance team and escalated to the Board or Audit Committee when necessary. Payscale maintains a **strict non-retaliation policy** to protect individuals who report concerns in good faith.

H. Monitoring and Performance Review

Payscale monitors the effectiveness of our modern slavery prevention program through:

- Annual reviews of third party vendors
 - Tracking completion rates of training across departments
 - Recording and resolving whistleblower or audit-related issues
 - We aim for continuous improvement and regularly benchmark our practices against evolving legal standards and industry best practices.
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I. Legislative Compliance

This Statement is made in accordance with the UK Modern Slavery Act 2015 and is intended to meet requirements in other applicable jurisdictions, including:

- California Transparency in Supply Chains Act
- Commonwealth Modern Slavery Act (Australia)
- Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act (2024)

Approval and Attestation

This Statement has been approved by Curo Compensation Limited Board of Directors and signed by a Director.

In accordance with Section 11 of the Canadian Forced Labour Act and the UK Modern Slavery Act 2015, I attest that I have reviewed the information contained herein. Based on my knowledge and having exercised reasonable diligence, I confirm that this Statement is true, accurate, and complete in all material respects for the reporting year.

Curo UK & Curo Canada

DocuSigned by:
Kristin Boraas
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Kristin Boraas
General Counsel
Payscale, Inc.

