



VFS Global

Modern Slavery Statement

1. Introduction:

Pursuant to section 54(1) of the Modern Slavery Act 2015 (United Kingdom) ("UK MSA") and the *Modern Slavery Act 2018* (Cth) (Australia) ("Australian MSA"), this statement is made by VFS Global AG as the parent company on behalf of itself and its subsidiaries, specifically including VFS Global Services PLC (UK), VF Worldwide Holdings Ltd, VFS Services Australia Pty. Limited (Australia), VFS International Australia Pty Ltd (Australia), and VASCO Worldwide Pty Ltd (Australia), for the reporting period 1 January 2024 to 31 December 2024.¹

VFS Global AG, and its affiliates ("VFS Global") are engaged in visa outsourcing and technology services for governments and diplomatic missions worldwide. VFS Global manages the administrative and non-judgmental tasks related to visa, passport and consular services for its client governments. It has operations in 165 countries, with 4,019 centres processing visas for 70 client governments.

VFS Global is committed to preventing modern slavery in all its forms. We recognise that slavery, forced labour, and human trafficking are serious human rights abuses and are committed to upholding human rights in our operations and supply chain. As part of our commitment, we have implemented policies, procedures and controls to identify and mitigate modern slavery risks. We require all our suppliers and business partners to adhere to our human rights and anti-slavery policy.

We do not tolerate any form of forced labour, child labour, human trafficking, or slavery, and we expect all our employees and business partners to uphold this policy. In line with our Anti-Slavery and Human Trafficking Policy, we have established effective systems and controls to prevent the occurrence of slavery, human trafficking, forced labour or child labour in our business or supply chain, as well as with third party entities involved in our operations. Our employees are encouraged to report any witnessed violations or concerns, and they are strictly prohibited from supporting or engaging with any suppliers or businesses that participate in any form of slavery or human trafficking.

We are committed to respecting human rights throughout our value chain in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. Our commitment includes all internationally recognised human rights, including those contained in the International Bill of Human Rights and the International Labour Organization's (ILO) Core Labour Rights Conventions. VFS Global is also a signatory to the United Nations Global Compact (UNGC), and we ensure commitment to the ten principles of the UNGC including human rights and labour practices related measures in our operations and supply chain.

2. Organisational Structure, Operations and Supply Chains:

VFS Global and its subsidiaries are limited liability companies with over 13,000 employees worldwide. Our key suppliers and contractors encompass a wide range of partners, including joint ventures, Facility Management Companies ("FMC"), business partners, subcontractors, business development consultants, agents, intermediaries, representatives, suppliers, and any party providing services to or on behalf of VFS Global in the following areas:

¹ Unless otherwise specified explicitly, references to 'we', 'us' and 'our' refer to the VFS Global group as a whole, including the reporting entities mentioned in this statement.

- **Real estate:** Offices where we operate and house our processing centres.
- **Technology:** IT hardware, software and printing services essential for our business operations.
- **Communications:** Equipment that facilitates communication among staff and with customers.
- **Facility/Housekeeping Services:** Maintenance, cleaning, and operational services, including office equipment and supplies.
- **Transport:** Services such as airlines and couriers.
- **Marketing:** Merchandise suppliers and conference service providers.
- **Professional Services:** Auditors, accountants, consultants, legal counsel, banks, insurers, recruitment agencies, and education and training providers.

3. The Risks of Modern Slavery in our Operations and Supply Chains:

We consider the risk of modern slavery within the entities comprising VFS Global to be relatively low. Modern slavery and human trafficking are typically found in industries that depend on large numbers of unskilled or manual labourers. As a provider of visa and consular services, VFS Global engages a workforce of educated and skilled individuals in professional support services or office facilities who are more informed about issues such as slavery, forced labour, and human trafficking. The specialised nature of our work lowers the risk of these practices within our organisation.

However, VFS Global recognises specific industry risks that could be linked to modern slavery. These risks primarily arise in sectors relying on contract and outsourced labour, especially in regions with less stringent labour laws. Services such as facility/housekeeping and transport are considered higher risk for modern slavery due to their reliance on low-wage contract workers and the prevalence of informal labour arrangements, which can lead to exploitation in regions with weak labour protections and oversight.

VFS Global operates a vast network of visa application centres across the globe, including in countries identified as more vulnerable to modern slavery risks. Our business extends to regions with varying levels of economic development and regulatory strength, including those with higher risks, such as South Asia, Southeast Asia, and parts of Africa. We consider geographic location, socio-economic conditions, and the regulatory environment. Research from the Global Slavery Index² and the International Labour Organisation (ILO)³ highlights that countries like India, Bangladesh, and Nigeria are flagged for labour exploitation due to weaker regulatory frameworks and more informal labour markets. In contrast, countries with stronger labour laws and enforcement, such as those in Western Europe, North America, and Australia, present a lower risk, with robust labour regulations ensuring transparency and protecting workers' rights. We acknowledge the heightened risks in the high-risk regions where we operate and remain committed to upholding rigorous ethical standards to mitigate these risks and ensure responsible practices throughout our global operations.

4. The Actions taken to Assess and Address Modern Slavery Risks:

We take a robust approach to identifying and mitigating modern slavery and human trafficking risks across our third party network. To ensure all those in our supply chain and contractors comply with our values, we have in place written policies and procedures, due diligence, training programmes, risk assessments, continuous monitoring, and reporting and grievance mechanisms.

² The Global Slavery Index. Report. Walk Free Foundation, 2024.

³ <https://www.ilo.org/>

4.1. Policies and Procedures:

VFS Global maintains written policies and procedures that underpin our commitment to addressing the risks of modern slavery and human trafficking in our supply chains and in any part of our business. Our policies reflect the company's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to identify and mitigate the risk of modern slavery and human trafficking within the wider organisation and its extended supply chain. We have the following policies in place relevant to modern slavery risks:

- Global Anti-Slavery & Human Trafficking Policy
- Third Party Code of Conduct
- Anti-Bribery & Corruption Procedure
- Speak Up Policy
- Diversity Equity & Inclusion Policy
- VFS Global HR - Anti-Harassment & Bullying Policy
- Environmental Policy
- Speak up Policy
- Procurement Policy
- VFS Global HR - Child Safeguarding Policy
- Health & Safety Policy

Outlined below are key components of our policies that specifically address modern slavery:

VFS Global's Policies outline the company's zero tolerance approach to modern slavery within its operation and supply chains. The policy has been disseminated to all staff across all regions and helps staff identify instances of modern slavery. Further, the policy encourages staff to report related concerns and incidents using the escalation matrix available across the organisation. Management is also obligated to act on any raised concerns and is held accountable for lack of action where necessary.

Our **Third Party Code of Conduct** defines our principles for conducting business with third parties and explains what they are required to comply with as part of their contractual arrangements with VFS Global, including, but not limited to, prohibiting any form of forced labour or slavery. It is standard practice for our third parties to agree, sign and abide by our code, which also mandates them to ensure compliance within their own supply chains.

Similarly, our company-wide **Employee Code of Conduct** sets standards of behaviour and conduct expected from our workforce in their business dealings. The code is applicable to the company's Board of Directors, Executive Board, and all employees, as well as the facilities management personnel we work with.

Further, VFS maintains a **Global Speak Up Policy** which encourages employees and third parties to raise any concerns or potential breaches of the statement to us through the designated email or portal, detailed further below under the Reporting and Grievance Mechanisms.

Our Human Rights and Labour Practices are communicated to all our suppliers, contractors, and business partners on an annual basis.

4.2. Risk Assessment:

Each of our third party relationship undergoes a thorough risk assessment process to identify, evaluate, and mitigate potential risks. This assessment considers various factors such as the third party's geographic location, industry practices, regulatory compliance, and the likelihood of exposure to issues like modern slavery, forced labour, or environmental hazards. By proactively assessing risks, we ensure that our third parties meet our ethical standards and that any potential threats to our supply chain are addressed early on.

4.3. Due Diligence:

VFS Global's ethical procurement process is designed to ensure that we carefully evaluate and select potential third parties based on their commitment to ethical standards. We conduct strict due diligence to screen all of our third parties to ensure compliance with modern slavery and labour standards, including their adherence to labour laws, environmental sustainability, and social responsibility. By incorporating these criteria into our third party vetting and selection, we aim to work only with partners who share our values and commitment to human rights, fair labour practices, and responsible sourcing. This approach helps mitigate risks related to unethical behaviour, such as modern slavery or exploitation, across our supply chain.

We mandate the inclusion of **VFS Global's Third Party of Conduct** in each contract with our third parties to ensure that our ethical standards are upheld across all partnerships. These clauses explicitly require third parties to comply with laws and regulations related to labour practices, including the prohibition of forced labour, child labour, and human trafficking. In addition, the Third Party Code of Conduct covers critical areas such as environmental sustainability, anti-corruption, health and safety, and fair wages. By mandating these clauses, we ensure that all third parties are legally obligated to adhere to our values and ethical commitments. Non-compliance with these standards can result in contract termination and other legal actions.

In addition, VFS Global ensures that each of its third parties are in adherence with the Third Parties Code of Conduct.

4.4. Training & Awareness:

In 2024, communication and awareness were provided to all the employees regarding the Human Rights and Labour Practices related commitments and policies.

As part of **VFS Global's Induction Programme**, all new employee are required to participate in mandatory training on **VFS Global Anti-Slavery & Human Trafficking Policy**. This onboarding training equips new staff with necessary knowledge to recognise the signs of modern slavery and understand the Company's commitment to combatting these risks. Adherence to this policy is required under VFS Global's employee contracts.

In addition to onboarding, annual training is provided to all employees through various formats including classroom style, virtual webinars, or eLearning modules. These annual training sessions are followed by online assessments to confirm they have understood the content delivered. Certificates are awarded to staff upon successful completion of the training modules and assessment. We also implement quizzes, case studies and awareness sessions periodically to ensure robust understanding and recall of the policy. Furthermore, our training includes Third Party Appointment,

Due Diligence and Management, to remind our employees of the importance, scope and responsibilities associated with third party risk management. An e-learning training module was developed and deployed to all employees, covering all regions and countries of operations, starting in April 2024 and running through to March 2025.

In 2024, 100% of employees received human rights training awareness (anti-harassment, non-discrimination, child labour, modern slavery and (for targeted employees only) forced labour).

Furthermore, VFS Global employees in management positions (Senior Managers and Directors) receive briefings and communications regarding the identification and mitigation of risks related to modern slavery in addition to the onboarding and annual trainings.

Externally, VFS Global engages with suppliers and business partners to convey **VFS Global Anti-Slavery & Human Trafficking Policy** and to gain an understanding of measures taken by them to ensure modern slavery is not occurring in their operations.

4.5. Reporting & Grievance Mechanisms:

VFS Global is committed to treating all reports with the utmost seriousness and confidentiality, ensuring the protection of any reporting individual. Our Speak Up channels are our confidential grievance mechanism for employees and third parties to report misconduct, including matters regarding human rights and modern slavery risks. Employees and third parties can report potential concerns or breaches by sending an email to SpeakUp@vfsglobal.com or by reporting anonymously via vfsspeakup.ethicspoint.com. These are communicated to our employees and third parties through email communication and trainings. Our **Global Speak Up Policy** provides a framework to promote responsible and secure escalation of staff and stakeholder concerns regarding a range of unethical and criminal behaviour. It ensures that anyone who wishes to raise a concern is protected, and that their concerns are investigated in an independent manner. The **Global Speak Up Policy**, and the **Investigation Protocol**, also set out a clear investigation process which VFS Global will follow in the case of any reported concerns.

In addition to the **VFS Global Speak Up Channels**, VFS Global employees are encouraged to report any suspicious activities involving potential exploitation to their reporting manager, or equivalent senior leader, who will conduct a preliminary inquiry before preparing a report to the **Anti-Corruption Compliance Officer (ACCO)** for further investigation and escalation to the **General Counsel – Compliance (GCC)** and the Board. Externally, suppliers and business partners are advised to follow similar reporting procedures and contact the ACCO or GCC directly regarding any concerns. Members of the public can also report suspicions confidentially to the same contacts.

Contact Details:

ACCO: acco@vfsglobal.com

VFS Global considers the following as reportable suspicious activities related to modern slavery:

- If someone representing the organisation or its businesses is suspected of exploiting another person in a way that could constitute modern slavery.
- If someone representing one of the organisation's suppliers is suspected of exploitation.
- If an employee is approached by someone acting on behalf of the organisation or its businesses to participate

in actions that could lead to modern slavery offenses.

- If there is any information suggesting that someone acting on behalf of the organisation, its businesses, or suppliers is planning, committing, or has committed an act violating modern slavery laws.

VFS Global aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. It will be ensured that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the organisation's own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

4.6. Ongoing Monitoring & Review:

VFS Global is committed to actively mitigating modern slavery risks through a robust framework. This integrated approach ensures that our efforts to address modern slavery are measurable, effective, and continuously improved, adapting to the evolving nature of our business and external risk factors. Our framework ensures we are taking proactive and measurable steps to mitigate modern slavery risks across our global operations and supply chain.

- We ensure that our third parties sign and comply with **VFS Global's Third Party Code of Conduct**, which includes explicit clauses addressing modern slavery.
- We prioritise the training of our employees, contractors, and suppliers, with a target of achieving over 95% completion rate for mandatory training on human rights and modern slavery awareness. Training completion rates are monitored through our internal systems, and courses are regularly updated to reflect emerging risks.
- Incidents of modern slavery are closely monitored through our Speak Up grievance mechanism, which provides employees and third parties with a confidential channel to report potential violations. To ensure the effectiveness of the grievance mechanism, we regularly analyse trends in reported cases and review how they are handled. This enables us to make necessary improvements to the process and maintain transparency.
- We conduct internal screening of all third parties based on environmental, social, labour, and human rights considerations to assess and address modern slavery risks through basic and enhanced screening checks as applicable
- Our senior management conduct an annual review of VFS Global's overall response to modern slavery, ensuring that our policies, procedures, and third party relationships remain aligned with our ethical commitments.
- We implement labour monitoring and payroll systems to measure effectiveness of the policy across business or supply chains.

VFS Global's modern slavery risk profile is reviewed annually by our Compliance function in consultation with relevant business and regional teams. These reviews take into account evolving client government requirements, changes in our operating environments, and emerging global regulatory and human rights developments, ensuring that our approach remains responsive and fit for purpose.

VFS Global Risk Management function plays a key role in guiding how we assess and address modern slavery risks by providing overarching process and methodology for conducting risk assessments, ensuring that reviews are

structured, consistent, and aligned with our enterprise risk management approach. The Compliance function works closely with Risk Management, undertaking periodic consultations and ensuring that any suspected or identified issues related to modern slavery are promptly reported and reviewed. This framework supports our business and functional teams in identifying potential areas of exposure, evaluating control measures, and integrating findings into our broader risk registers. By doing so, Risk Management ensures that modern slavery considerations are systematically embedded into the way we assess and manage risks across the organization.

5. Effectiveness of our Actions:

In 2024 VFS Global did not receive grievances related to human rights or labour issues, including matters concerning modern slavery through reports submitted to the Anti-Corruption Compliance Officer or the General Counsel. This absence of reported grievances reflects the effectiveness of our preventive measures, ethical policies, and third party oversight in minimising risks associated with modern slavery across our operations and supply chain.

While this is a positive outcome, VFS Global remains vigilant and committed to continuously monitoring, improving, and reinforcing our mechanisms for reporting and addressing such concerns. Our Speak Up channels and training programmes are designed to ensure that any issues related to modern slavery are promptly identified and addressed, reinforcing our commitment to ethical practices and the protection of human rights throughout our organisation. We recognise that the absence of reported cases does not negate the potential risks, and we will continue to strengthen our efforts to ensure a transparent, safe, and responsible working environment.

6. Next Steps:

VFS Global recognises that tackling modern slavery requires a continuing year-on-year commitment. In future financial years, we will continue to collaborate with our workforce and broader community to address the risk of modern slavery in our supply chain.

Following a review of the effectiveness of the steps we have taken this year to prevent and mitigate modern slavery and human trafficking in our supply chains, we intend to take the following further steps to combat modern slavery and human trafficking:

- Initiate supply chain management procedures to ensure supply chains are meeting compliance with policies, international standards, and local laws.
- Include contractual provisions for third parties to confirm their adherence to **VFS Global Anti-Slavery & Human Trafficking Policy** and to comply with the UK MSA and AU MSA.
- Include provisions in third party contracts for VFS Global's right to audit their activities and (where practicable) relationships, both routinely and at time of reasonable suspicion.
- Conduct periodic audits and on-site assessments of high risk third parties to confirm all employees are paid at least the minimum wage and have the right to work.
- Where appropriate, as informed by risk assessment, seek to introduce third party pre-screening (for example as part of the tender process) and self-reporting for third parties on safeguarding controls.

7. Approval & Signature:

This statement was approved by the Board of VFS Global AG on behalf of itself and its subsidiaries, VFS Global Services PLC (UK), VF Worldwide Holdings Ltd, VFS Services Australia Pty. Limited (Australia), VFS International Australia Pty Ltd., and VASCO Worldwide Pty Ltd. and is signed by Zubin Karkaria the Chief Executive Officer of VFS Global AG on 15th December 2025.

Signed:



Zubin Karkaria

Founder and CEO

VFS Global AG

Date: 15th December 2025.





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