



Modern Slavery Policy

I. Introduction

EcoFlow is a leading global provider of portable power systems, solar energy technologies, and integrated smart-home energy solutions, recognised for its innovation, reliability, and industry-leading performance across international markets. EcoFlow Australia Pty Ltd (hereinafter “the Company”) forms part of EcoFlow’s global operations, with a dedicated focus on serving and supporting the Australian market.

We recognize that modern slavery is a serious global human rights issue, affecting a wide range of people in various industries worldwide and even present in Australia. Modern slavery refers to situations of extreme exploitation where coercion, threats, or deception that deprive individuals of their freedom.

As a company with strong international presence and a global supply chain, we acknowledge our responsibility to identify and mitigate all forms of modern slavery and are committed to conducting our business with integrity, transparency, and respect for human rights in our operations and supply chains. We oppose all forms of modern slavery and are committed to ensuring that such practices have no place within our business or our supply chains.

This Modern Slavery Policy (hereinafter “this Policy”) sets out our commitment, responsibilities, and the measures we implement to prevent, identify, and address modern slavery risks across our operations. It aligns with our broader Environmental, Social and Governance (ESG) principles and our existing ethics and procurement frameworks, and reflects our overarching commitment to lawful, responsible, and ethical business conduct.

As a company with global operation, we are committed to comply with all applicable modern slavery and human rights laws in the jurisdictions in which we operate, including where relevant, the *Modern Slavery Act* (2015) of the United Kingdom, the *California Transparency in Supply Chains Act* (Calif. Civil Code § 1714.43), *Supply Chain Due Diligence Act* (Germany) 22 July 2021, and equivalent legislation or regulatory requirements in other countries.

Our practices are informed by key international standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the core conventions of the International Labour Organization (ILO). Consistent with these frameworks, we acknowledge our responsibility to respect human rights and to prevent, mitigate, and address modern slavery risks across our operations and supply chains.

II. Purpose

The purpose of this Modern Slavery Policy is to outline the Company's approach to identifying, assessing and mitigating the risk of modern slavery in our business operations and supply chains.



This policy explains our commitments and the measures we have implemented to ensure that we are not complicit in any form of modern slavery. It enables the Company to:

- Comply with applicable laws including but not limited to Australia’s *Modern Slavery Act 2018* (Cth) (hereinafter “the Act”) and other international legal obligations;
- Operate ethically by sourcing goods and services in a manner consistent with our legal obligations and ethical standards, working with suppliers and partners to identify, assess, and respond to modern slavery risks by taking appropriate steps to assess and address modern slavery risks;
- Strengthen risk awareness and vigilance through staff and stakeholder training and education on modern slavery, reducing the likelihood of the Company causing or contributing to it, and empowering us to positively influence the elimination of exploitation within our sphere of control.

III. Scope

Clearly defining the scope ensures that all stakeholders understand their obligations and that our modern slavery safeguards are applied consistently across our operations and supply chain.

This section outlines the individuals and entities to whom this Policy applies, as well as the scope of activities covered under the Company’s modern slavery commitments.

i. Application of this Policy

This Policy applies to all employees, officers, directors, contractors, suppliers, external business partners and other stakeholders who work for, act on behalf of, or are otherwise engaged by the Company and also extends to all our subsidiaries and affiliates across all jurisdictions in which the Company operates.

We expect our suppliers, vendors, service providers and other external partners to uphold standards that are consistent with this Policy and to comply with its requirements in all interactions, transactions, and business dealings with the Company.

We will communicate our zero-tolerance stance to all suppliers, contractors and business partners at the outset of our business relationship with them.

ii. Scope of Activities Covered

This Policy applies to the following business activities of the Company and affiliates:

a. Procurement of Goods and Services

All sourcing, purchasing, and supplier-engagement activities across the Company’s global operations, including procurement relating to hardware development, manufacturing, logistics, technology services, and operational support.

b. Investments (Debt and Equity)

All investment activities whether direct or indirect undertaken by the Company, whether through debt, equity, or hybrid instruments, including investments in subsidiaries, joint ventures, strategic partnerships, and third-party ventures.

c. Collaborative and Commercial Arrangements

All contracts, arrangements, and understandings entered into by the Company in the course of carrying out its functions, whether or not they directly relate to procurement or form part of the Company's investment activities, including without limitation, Memoranda of Understanding (MOUs), Consultancy and Advisory Agreements, Joint Venture, Agency and Partnership Arrangements.

IV. What is Modern Slavery?

Providing clear definitions is essential to ensure all stakeholders understand the conduct prohibited under this Policy and can identify potential risks or indicators of modern slavery within our operations and supply chain.

This section sets out the definition of modern slavery and its key features.

i. Definition of Modern Slavery

The term "Modern Slavery" under Australian modern slavery laws and regulations, primarily the Act, refers to serious forms of exploitation that violate an individual's fundamental human rights, i.e. situations in which a person cannot refuse or leave due to threats, coercion or deception.

It is an umbrella term that encompasses serious exploitation, including human trafficking, slavery servitude, forced labour, forced marriage, debt bondage, deceptive recruitment for labour services and child labour and exploitation.

ii. Key Features of Modern Slavery

Modern slavery practices typically exhibit one or more of the following characteristics:

a. Lack of genuine freedom or choice

Situations in which an individual is unable to refuse work, leave their position, or exercise personal autonomy due to coercion, threats, deception or constraint.

b. Use of coercive, deceptive or exploitative practices

Conduct involving threats, intimidation, deception, manipulation, abuse of power, or taking advantage of a person's vulnerability to compel labour or services.

c. Exploitation for commercial or personal gain

Circumstances where a person's labour, services or freedom is exploited for the financial or personal benefit of another party.

d. Occurs in all jurisdictions and industry sectors

Modern slavery can arise in both high-risk international environments and in highly regulated, advanced economies including Australia. It can occur even within legitimate and regulated industries, including manufacturing, agriculture, construction, warehousing, cleaning, logistics and technology supply chains.

It shall also be noted that risks frequently arise in contexts involving complex subcontracting, labour-hire arrangements or limited supply chain transparency, as these factors can obscure exploitative practices.

V. Policy Statement

The Company is committed to the following:

- adhere to a zero-tolerance approach to any forms of modern slavery;
- establish a comprehensive and solid regulatory and compliance framework;
- conduct due diligence so as to effectively identify and monitor the modern slavery risks;
- adopt a risk-based approach to regularly assess the potential modern slavery risks and the risk levels, and mitigation strategies;
- provide training and increase awareness among our employees, contractors, suppliers and other stakeholders as to the identification and mitigation of the modern slavery risks;
- establish reporting lines to encourage reporting of any concerns related to modern slavery and ensure transparency;
- establish robust governance and accountability frameworks to oversee the identification, management and reporting of modern slavery risks;
- make continuous improvement and updates of our policies and practices.

The Company will prepare, approve and publish an annual Modern Slavery Statement in accordance with the Act. This Statement will outline the actions taken during the relevant financial year to identify, mitigate and manage modern slavery risks, and will demonstrate the Company's commitment to continuous improvement in its due diligence and risk-management practices.

VI. Our Operations and Supply Chains

The Company operates globally across the technology and renewable energy sectors. Our products and services include portable power solutions, home solar battery systems and smart devices. Our supply chain is broad, multi-tiered, and international in scope.

We procure a wide range of goods and services, including electronic components, raw materials, industrial equipment, software and IT services, and professional and technical services, sourced from both large multinational suppliers and smaller local subcontractors.

We acknowledge that particular segments of the supply chains carry heightened risks of modern slavery. Industry research has identified increased vulnerability to forced labour and related exploitation in the

extraction and processing of certain raw materials, as well as in the manufacturing of specific electronic components critical to our sector.

VII. Risk-based Approach and Due Diligence

We adopt a risk-based approach to identifying and mitigating modern slavery risks within our operations and supply chain, supported by robust risk assessment and due diligence processes. This section outlines our due diligence framework and the procedures we use to assess, manage, and address potential modern slavery risks.

i. Risk Factors

We assess modern slavery risks across several key factors, including:

a. *Country Risk*

We review the geographic locations of our suppliers and operations, recognising that some jurisdictions have higher prevalence of forced labour or weaker worker protections;

b. *Industry and Sector risk*

We consider the specific industries from which we source, such as raw material extraction, electronics manufacturing, or construction, which are globally associated with elevated exploitation risks;

c. *Product and Service Risk*

We evaluate goods such as renewable energy components, electronic equipment, and personal protective equipment, as well as services like cleaning, security, or labour hire that may involve vulnerable workforces; and

d. *Entity Risk*

We examine the characteristics of individual suppliers and contractors, including their size, reputation, workforce model, and supply chain practices, to determine whether they present heightened modern slavery vulnerabilities, particularly where they operate in high-risk regions or industries.

ii. Risk monitoring

Regular risks monitoring is undertaken through periodic reviews and, where appropriate, audits of higher-risk suppliers to verify ongoing compliance. Through our supplier review processes, we assess continued performance and alignment with our standards and determine whether the supplier remains suitable for ongoing engagement.

iii. Due Diligence

We conduct structured due diligence when onboarding new suppliers, contractors, and business partners, and applies ongoing monitoring to existing engagements.

For higher-risk suppliers, we assess labour practices and modern slavery controls through self-assessment questionnaires, verification of legal compliance, and adverse media or sanctions screening.

Modern slavery considerations are embedded in procurement processes, including supply-chain mapping to improve visibility over the sourcing of materials and services, with enhanced scrutiny of jurisdictions and industries known to present elevated risks.

VIII. Training and Awareness

In recognition of importance of training and education, we are committed to providing appropriate training and resources to ensure our people understand what modern slavery is, how to identify potential indicators, and the steps to take if concerns arise.

This section outlines our approach to training and awareness.

i. Employee Training

We deliver modern slavery and human trafficking training to employees across relevant areas of our business, with content tailored to the nature of their roles. Training includes guidance on recognising indicators of modern slavery, such as signs of coercion or restrictions on freedom of movement, industry-specific risk scenarios, and the procedures for reporting concerns.

Employees are also briefed on the requirements of this Policy, our organisational commitments, and their individual responsibilities. New employees would receive an introduction to modern slavery risks and our internal processes as part of their induction program.

ii. Supplier and Partner Engagement

We also promote awareness of modern slavery risks among our suppliers, contractors, and business partners. Our zero-tolerance approach is communicated at the outset of each new relationship, together with our expectations and any relevant contractual obligations.

Where appropriate, we would provide or share resources to our suppliers, contractors, and business partners, particularly those with higher-risks, to support their capability to identify and prevent modern slavery.

iii. Continuous Awareness and Communication

We reinforce the importance of addressing modern slavery through regular internal communications and updates. Management periodically discusses modern slavery risks in team meetings and company-wide forums, and we maintain accessible documentation to ensure employees and suppliers can readily reference the relevant standards and reporting processes.

IX. Reporting and Whistleblower Protection

We strongly encourage all employees, contractors, suppliers, and other stakeholders to speak up if they observe or suspect any activity that may involve modern slavery or related forms of exploitation connected to our business or supply chain.

This section outlines our reporting options, protections against retaliation, and the process for investigating reported concerns.

i. Reporting Options

Individuals can report concerns directly to their manager or supervisor. If a reporter is not comfortable speaking with their direct manager (for example, if the concern implicates that manager, or if the reporter feels the issue is not being taken seriously), concerns can be reported directly to the Compliance Department by way of email to legal@ecoflow.com.

ii. Protection from Retaliation

We guarantee that anyone who raises a concern in good faith will not face retaliation or any form of detrimental treatment. This includes dismissal, disciplinary action, harassment, intimidation, or any other adverse conduct. The Company is committed to protecting whistleblowers, and any retaliatory behaviour is strictly prohibited and may result in disciplinary action.

iii. Investigation of the Report

Upon receipt of the report, the Compliance Department shall commence prompt and fair investigations. The scope of the investigation and the investigation methodology will depend on the nature of the allegations and may involve interviews, document reviews, on-site inspections, or engaging with the supplier in question.

X. Governance and Accountability

Effective governance is essential to ensuring our modern slavery commitments are implemented across the organisation.

This section outlines the governance framework with respect to any potential breach of this Policy and the accountability structure that ensure effective oversight and implementation of our modern slavery commitments.

i. Investigation and Evaluation

Upon becoming aware of a potential modern slavery breach, we will promptly assess the credibility and seriousness of the concern and initiate an appropriate investigation.

The investigation will seek to establish the relevant facts, identify how the issue arose, determine responsibility, and assess whether any systemic or process failures contributed to the incident.

All findings will be documented and reported to senior management and, where appropriate, the Board of Directors. We will also notify regulatory authorities where required by law.

ii. Internal Accountability and Discipline

If any employee is found to have knowingly engaged in, facilitated, or willfully disregarded clear indicators of modern slavery, they will be subject to serious disciplinary action. This may include suspension, demotion, or termination of employment, in accordance with our Human Resource policies and applicable employment laws.

iii. Corrective Action

Where an external supplier, contractor or business partner is implicated in a modern slavery incident, we will notify the relevant entity of our findings and, where appropriate, require a corrective action plan addressing the identified issues. This may include ceasing prohibited practices, releasing individuals from coercive conditions, reimbursing unlawful fees, improving labour standards, and strengthening supply-chain oversight. Compliance will be monitored through follow-up audits or independent third-party review.

Consistent with our zero-tolerance stance, the Company reserves its right to suspend or terminate any relationship with a supplier, contractor, or partner involved in modern slavery, particularly where they fail to cooperate or do not take adequate corrective action within a reasonable timeframe.

iv. Remediation Action for Victims

If modern slavery is confirmed or reasonably suspected within our operations or supply chain, our foremost priority is the safety and wellbeing of affected individuals. We will take immediate steps to remove individuals from harm and ensure appropriate remediation, which may involve engagement with local authorities, law enforcement, or reputable non-government organisations to facilitate necessary support, including safe accommodation, healthcare, legal assistance, or repatriation for migrant workers.

Where issues arise at a supplier facility, we may also work with independent organisations to support impacted workers while corrective actions are implemented.

v. Reporting and Oversight

All confirmed incidents of modern slavery, along with the remedial actions taken, will be reported to the Company's Board of Directors (or the relevant Board committee) in a timely manner. The Board of Directors shall review the incident, the Company's response, and any lessons learned to ensure appropriate oversight and to inform any necessary strategic or operational improvements.

vi. Ultimate Responsibility

Ultimate Responsibility for this Policy rests with the Board of Directors which holds overall accountability for ensuring compliance with our ethical and legal obligations relating to modern slavery and oversees the effectiveness of this Policy as well as is responsible for the review and approval of the Company's annual Modern Slavery Statement.

Through this oversight role, the Board of Directors provides clear leadership and reinforces a culture of transparency, integrity, and accountability in relation to human rights.

vii. Operational Responsibility

Operational responsibility for implementing and enforcing this Policy is delegated to senior management and the compliance function. The Company's the Compliance Department together with relevant department heads are responsible for the ongoing administration of this Policy with key responsibilities include monitoring its application and effectiveness, responding to queries or issues that arise, and conducting periodic reviews and audits of internal systems and controls to ensure they remain robust and effective in preventing and addressing modern slavery risks.

Management at all levels is expected to demonstrate leadership in upholding this Policy. Managers are responsible for ensuring their teams understand and comply with the Policy and for providing appropriate guidance and training on modern slavery risks and the Company's procedures.

All employees and individuals working on our behalf share responsibility for preventing modern slavery, including by remaining vigilant, identifying potential risks, and reporting concerns.

XI. Review, Update and Approval

Combatting modern slavery requires ongoing vigilance and continuous improvement. We are committed to regularly reviewing and enhancing our policies, procedures, and operational practices to ensure they remain effective and responsive to evolving risks, regulatory developments, and industry standards.

This section outlines our review frequency, measures for assessing effectiveness, processes for policy updates and improvements, our approach to continuous learning, and the framework for policy approval and amendment.

i. Review Frequency

This Modern Slavery Policy will be reviewed at least on an annual basis and updated as necessary to reflect legislative changes, emerging risks, alignment with the best practices, and developments in the Company's operations.

ii. Assessing Effectiveness

The Company's the Compliance Department , in consultation with relevant business units, shall assess the policy's effectiveness and identify any required improvements. This may include reviewing employee training completion rates, the number of reported concerns or modern slavery incidents, studying the typology of the breaches, monitoring the progression on any corrective action plans with external suppliers and contractors.

We may engage independent expert or consultant who has not been involved in the development or overseeing the implementation of this Policy to conduct independent review for assessment of whether this Policy is up to date.

iii. Continuous Learning

We are committed to continuous learning through participation in training programs, industry forums, and engagement with expert resources on modern slavery and human rights.

iv. Approval and Amendment

This policy has been approved by the Company's Board of Directors and is effective as of the date of approval. It will be reviewed and updated as outlined above.

Last updated: December 2, 2025