



Modern Slavery Statement

For the Financial Year Ending December 31, 2024

This Statement is made on behalf of Scale AI, Inc. and its wholly owned subsidiaries, including Scale AI Limited (collectively “Scale”), pursuant to the U.K. Modern Slavery Act 2015 and other applicable statutes and regulations in force in the countries in which Scale operates. It outlines Scale’s efforts and actions to ensure modern slavery, human trafficking, forced labor, and other forms of human exploitation (“Modern Slavery”) are not taking place in our business operations and supply chain.

Scale is committed to the highest standards of ethical conduct and to accelerating the development of artificial intelligence (AI) applications for a better world. We are opposed to Modern Slavery in all its forms and fully embrace our corporate responsibility to respect and protect human rights, as articulated in internationally recognized standards such as the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization (ILO) Conventions.

These international standards establish our baseline expectations and inform our company values, policies, and processes. As our Code of Conduct provides:

“At Scale we believe in committing to the highest standards of ethical business conduct because we have incredibly high standards for ourselves and because we want to earn the trust and loyalty of our customers, partners, and colleagues. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.”

About Scale

Our mission is to develop reliable AI systems for the world’s most important decisions.

We provide high-quality data and full-stack technologies that power the world’s leading models, and enable enterprises and governments to build, deploy, and oversee applications that deliver real impact.

To find out more about Scale, please visit our website at www.scale.com.



Our Business

Founded in 2016 and headquartered in San Francisco, California, Scale operates in two primary business segments:

- **Data Infrastructure.** We deliver the high-quality training, alignment, and evaluation data the most advanced AI models need to perform safely and effectively. Trusted by leading ML teams worldwide, Scale provides unmatched expertise, quality, and operational scale to accelerate model development.
- **AI Applications.** We help enterprises and governments make AI work by building agentic solutions tailored to their goals, whether that's driving revenue, developing sophisticated mission and operations planning, or improving customer experience.

We employ more than 1,000 people in several countries around the world. We also support the workforce of the future, with nearly \$1B paid out to date to hundreds of thousands of contributors across over 150 countries.

Our Supply Chain

Scale relies on two distinct types of supply chains.

Corporate and Engineering Supply Chain. This supply chain is similar to that of other comparable technology companies and supports our daily corporate and engineering operations. It consists primarily of professional services, office goods and services, and procurement of technology required to deliver our engineering services.

We assess this supply chain as presenting a very low risk.

Operational "Human-in-the-Loop" Supply Chain. This supply chain is part of our Data Infrastructure segment. It consists of the global community of contributors that generates, labels, annotates, and refines the high-quality data to train and evaluate AI models.

Contributors may access work through third-party Business Process Outsourcing ("BPO") and other service providers engaged by Scale, as well as our own proprietary platforms such as Outlier.

This supply chain, which involves a large and geographically dispersed community of contributors, presents a relatively higher potential risk, compared to our Corporate and Engineering Supply Chain. We rate the risk in this area as low-to-moderate and apply enhanced due diligence and risk mitigation measures to manage it effectively.



Our Policies

Scale's commitment to integrity is anchored by foundational corporate policies.

The **Scale AI Code of Ethics and Business Conduct**, which applies to all our employees and our Board, is one of the ways we put our values into practice. Our commitment to integrity begins with complying with all laws and regulations where we do business and is centered around respect for the individual, with zero tolerance for any forms of discrimination and abusive behavior.

We extend these standards to our entire supply chain through the **Scale Business Partner Code of Conduct**, which draws upon internationally recognized standards to advance social and environmental responsibility. It sets high expectations regarding labor and human rights, particularly by:

- preventing any form of involuntary labor, human trafficking, and underage labor;
- imposing special protections for juvenile and student workers;
- mandating maximum working hours and minimum wages; and
- ensuring freedom of association, collective bargaining, and effective grievance systems remain available.

Our Due Diligence

We focus our due diligence and risk management efforts primarily on our Operational “Human-in-the-Loop” Supply Chain.

We require strict adherence to our Business Partner Code of Conduct as a condition of engagement for our BPO and other service providers. This Code grants Scale the right to audit and assess partner operations to ensure compliance and provides for a corrective action process for any violations identified.

For our proprietary platforms, we conduct ongoing due diligence through platform-level controls and stakeholder engagement. For example:

- we require contributors to be of legal working age and may require identity verification to prevent underage labor;
- we partner with the Global Living Wage Coalition to conduct routine pay analyses and ensure fair and competitive compensation;
- for projects evaluating potentially sensitive content for AI safety, our standard practice is to provide contributors with advance notice, allow them to decline participation in the project, and offer wellness resources;



- we provide contributors with multiple channels for support, including 24/7 support teams and an anonymous hotline to report concerns.

Scale is committed to continuous improvement and measuring the effectiveness of our programs. For example:

- we track the timely correction of issues identified through our Business Partner Code of Conduct's corrective action process;
- for our contributor platforms, we have established customer support standards and performance metrics that we monitor regularly;
- we review all reports from our employee and contributor ethics hotlines to identify and address potential violations.

Approval and Forward Commitment

Scale is dedicated to continually enhancing our policies and processes to prevent Modern Slavery. We will build upon these steps in the coming year as we advance our compliance programs. We recognize that combating Modern Slavery is an ongoing effort, and are committed to continuously monitoring and evaluating whether our efforts to do so are effective.

This Statement was approved by the Board of Directors of Scale AI, Inc. in November, 2025 and the Board of Directors of Scale AI Limited in November, 2025.

Scale AI, Inc.

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Lauren Lennon
General Counsel, Secretary

Date 11/20/2025

Scale AI Limited

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A handwritten signature in blue ink that reads "Lauren Lennon".

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Lauren Lennon
Director

Date 11/20/2025