



HUMAN RIGHTS AND MODERN SLAVERY STATEMENT

HUMAN RESOURCES

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Name	Date	Reason for Change	Version Number
HR	May 2017	Review	V1
HR	May 2018	New Format	V2
HR	Oct 2018	Review	V3
HR	Dec 2018	Review	V4
HR	March 2020	Review	V5
HR	January 2021	Review	V6
HR	April 2022	Review	V7
HR	April 2023	Review	V8
HR	April 2024	Review	V9

APS Group Statement on Modern Slavery



Introduction

This statement is made pursuant to section 54(5) of the Modern Slavery Act 2015 and constitutes APS Group's commitment to adherence to the Act. Our statement also draws upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Our Principles

We will:

- aim to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do, in a timely and appropriate manner.
- seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products, and services through our business relationships.
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts.
- continue to look for ways to support the promotion of human rights within our business.

Though slavery was abolished in the UK more than 200 years ago, exploitation continues. We know that this abhorrent practice still continues today in one form or another in every country in the world, in the form of human trafficking, forced and bonded labour plus other kinds of slavery.

We adopt a zero-tolerance approach to any such activities within our own business or within our supply chain and we will take appropriate steps to ensure we provide a working environment where individuals' fundamental rights and freedoms are respected.

The following sets out the obligations to which APS Group will adhere and describes how we will continue to ensure that steps are taken to embed into the culture of the business appropriate systems and controls in order to prevent slavery and human trafficking in the United Kingdom and across our global companies.

Child Labour: APS Group will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.

Health, Safety and Hygiene: All APS Group employees will work in an environment that is both safe and healthy, in line with our UK Health and Safety Policy.

Discipline: APS Group prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and accessible to all employees in our Employee Handbook and Business Portal. All disciplinary measures of a serious nature are recorded and actioned.

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Freedom of Association and Employee Representation: APS Group recognises that all its employees have the right to form and join organisations of their own choosing as long as this does not cause any conflict of interest. APS respects employees' rights to belong to trade unions and fully complies with our legal obligations to inform and consult employees.

Working Hours: APS Group will ensure that working hours are reasonable and comply with the law and industry standards.

Equality of Treatment: APS Group is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, or social origin and to promoting equality of opportunity and treatment as.

Employment terms: APS Group will provide written and clear contracts which detail the terms and conditions of its employees' employment.

Remuneration: APS Group will, at a minimum, provide wages and benefits that meet national standards. We will provide employees with clear written information on their pay and conditions. APS Group is committed to equal pay and benefits for men and women for work of equal value.

We all have a responsibility to be aware of the risks, however small, in both APS Group and the wider supply chain. We encourage our employees to report any concerns to the Executive Team or Head of HR, however small and these concerns will be acted upon.

APS Group's Structure

APS Group is an international marketing services business providing integrated communications and customer experience programmes to local and global brands.

The customer solutions we deliver are underpinned by a broad range of services supported by great people, enabling technology and significant infrastructure. The core service offering includes strategy, content creation and content management, multichannel output management and associated logistics.

Supply Chain

APS Group acts ethically and with integrity in all business relationships throughout the supply chain, undertaking appropriate due diligence to identify and assess potential risk areas and to mitigate the risks posed by slavery and/or human trafficking occurring.

APS Group will not knowingly engage or deal with any business involved in slavery or human trafficking.

As part of our initiatives to identify and mitigate the risk of Modern Slavery APS Group will (but not limited to):

- Identify and assess potential risk areas when engaging new suppliers and completing stringent vetting and investigation of our supply chain; this includes carrying out the appropriate background and financial checks, quality checks and site visits in addition to receiving a signed Code of Conduct and Non-Disclosure Agreement (NDA) from the supplier.
- Perform enhanced on-going due diligence when reassessing existing suppliers, including the downward supply chain; to include both quarterly and annual business reviews with key suppliers.
- Where possible, build long-standing relationships with local and international suppliers and be clear about our expectations regarding ethical business behaviour, which is outlined in our Code of Conduct Agreement.
- Invoke sanctions against suppliers that fail to meet the expectations as an ethical business partner, all of which are contained in the Code of Conduct agreement. Failure to adhere to the above or to improve performance in line with an action plan could result in the termination of the business relationship.
- To continue to review and monitor our own internal payroll systems to ensure all employees are paid above the minimum wage and have the right to work.
- Will actively encourage the reporting of concerns to the business through the Whistleblowing procedure and provide appropriate protection of whistle blowers.

Employees

To ensure a high level of understanding of the risks of modern slavery and human trafficking in both APS Group and our Supply Chain, all employees will:

- Receive clear communications that they must adhere to the standards outlined in the Anti-Bribery and Corruption policy, which incorporates Modern Slavery and whistleblowing.
- Be provided with awareness training on the risks of modern slavery and human trafficking in our supply chains and our business to all relevant members of staff during induction and information is also contained on our business portal for reference.
- APS Group has in place systems to encourage the reporting of concerns or breaches of policy via the Whistleblowing process and will ensure the protection of any whistle-blower.

Commitment and Review

APS Group is committed to continuing to monitor the effectiveness of the programme, implementing enhancements when required, and ensuring that policies and procedures in relation to Modern Slavery are implemented.

The Executive Directors, along with the support from APS Group's Procurement, Human

Resources and Compliance functions will carry out an annual review of this policy and procedure, to ensure it continues to be suitable and relevant to the activities of APS Group.

Signed for on behalf of APS Group Limited

A handwritten signature in black ink, appearing to be 'Nick Snelson', written over a faint horizontal line.

Nick Snelson

Group Managing Director

2 April 2024