



MODERN SLAVERY POLICY

Issue Date:	1 December 2023
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1. Overview

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 This Modern Slavery Policy ('Policy') applies to the worldwide conduct of XLMedia plc (the 'Company') and its subsidiaries (the 'Group') as well as the Group's employees, directors, officers and associated personnel ('Group Personnel').
- 1.3 The Group are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.4 We are committed to ensuring there is transparency in the Group and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners as we stand against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5 In addition to the harm which may be caused to individuals who are victims of modern slavery, violations of this Policy may cause substantial harm to the Group, including but not restricted to; a potential threat to the Group's existing and important new business in regulated markets; loss of trust and confidence in the Group's brands among its customers, shareholders, business partners, Group Personnel, suppliers, and regulators; and significant reputational damage. Non-compliance with this Policy may result in disciplinary action up to and including termination of employment or of contractual engagement, in addition to potential criminal and civil penalties.
- 1.6 This Policy applies to all persons working for the Group, or on our or their behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded



workers, freelancers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (referred to as 'you' in this policy).

1.7 This Policy does not form part of any employee's contract of employment, and we may amend it at any time.

1.8 This Policy will be made available to all Group Personnel and to all suppliers whose contracts with the Group reference the Policy. The UK's Modern Slavery Act 2015 (the 'Act') requires the Group to publish a public slavery and human trafficking statement on its website. This statement can be found on the Company website.

2. Policy Statement

It is our Policy that: -

- statutory and regulatory obligations to prevent modern slavery are met in full and are applied as a minimum standard across the Group.
- the prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all Group Personnel, who will not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this Policy.
- the Group is committed to engaging with its stakeholders and suppliers to address the risk of modern slavery in its operations and supply chain.
- our zero-tolerance culture regarding modern slavery will result in the termination of contracts with suppliers or Group Personnel found to be engaging in such activity; and
- we will maintain a risk-based approach to modern slavery based upon the laws, regulations and regulatory guidance from the jurisdictions in which we operate. The objective is to ensure risks associated with modern slavery are identified and appropriately mitigated.

3. Responsibility for the Policy

3.1 The board of directors of the Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.



3.2 The Group Chief Financial Officer has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

3.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the CFO.

3. Compliance with the Policy

3.1 You must ensure that you read, understand and comply with this Policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

3.4 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the CFO as soon as possible.

3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the CFO.

3.6 We aim 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. We are committed to ensuring 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 our 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. If you believe that you have suffered any such treatment, you should inform the CFO immediately.

4. Communication and awareness of this Policy

4.1 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.