

SO-CREATIVE GROUP LTD

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Document Control

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1. Policy Statement

SO-CREATIVE GROUP LTD has a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude and child labour.

We are committed to acting ethically and with integrity in our business dealings and relationships. We will implement and maintain proportionate systems and controls designed to prevent modern slavery within our business and supply chains.

The Company supports the principles of the Modern Slavery Act 2015 and expects the same standards from its employees, workers, contractors, suppliers and business partners.

2. Purpose

The purpose of this policy is to:

- set out the Company's commitment to preventing modern slavery;
- identify the standards expected within our business and supply chains;
- establish procedures for identifying, reporting and addressing modern slavery risks;
- support compliance with the Modern Slavery Act 2015 and other applicable laws; and
- provide protection for individuals who raise genuine concerns.

3. Scope

This policy applies to:

- all directors and officers of the Company;
- all employees, workers, agency workers and interns;
- consultants, contractors and subcontractors;
- suppliers and service providers;
- agents, representatives and business partners; and
- any other person or organisation performing services for or on behalf of the Company.

This policy applies to the Company's UK and international activities.

4. Definitions

For the purposes of this policy, modern slavery includes:

- slavery and servitude;
- forced or compulsory labour;
- human trafficking;
- debt bondage;
- the unlawful exploitation of children;
- the retention of identity or immigration documents to control a worker;
- coercion through threats, violence, deception or abuse of vulnerability;
- restrictions preventing a worker from freely leaving employment; and
- other labour exploitation prohibited by applicable law.

Modern slavery can occur in any country and may affect adults or children.

5. Organisational Structure and Supply Chains

SO-CREATIVE GROUP LTD provides digital, marketing, design, website and software-related services.

Our supply chains primarily include:

- technology and software providers;
- cloud, hosting and communications providers;
- professional advisers;
- recruitment and staffing providers;
- marketing and media suppliers;
- freelance professionals, consultants and contractors;
- office, equipment and facilities providers; and
- outsourced technical or operational service providers.

The Company recognises that risks may be higher where services involve extensive subcontracting, overseas labour, recruitment intermediaries, temporary labour or operations in jurisdictions with weaker employment protections.

6. Prohibited Conduct

No person acting for or on behalf of the Company may:

- use forced, compulsory, trafficked or involuntary labour;
- require a worker to pay recruitment fees as a condition of obtaining work;
- knowingly retain a worker's passport, identity documents or work permits;
- use threats, intimidation, violence, deception or coercion to control a worker;
- prevent a worker from leaving employment in accordance with applicable law;
- employ children unlawfully or expose young workers to hazardous or exploitative work;
- conceal suspected exploitation;
- knowingly engage a supplier involved in modern slavery; or
- retaliate against anyone who reports a genuine concern.

7. Employment Practices

The Company will seek to ensure that:

- work is undertaken voluntarily;
- workers receive clear information about their role and material employment terms;
- workers are paid in accordance with applicable wage laws and contractual terms;
- working hours and leave arrangements comply with applicable requirements;
- workers are free to terminate their employment in accordance with their contract and applicable law;
- identity documents are not retained as a means of control;
- unlawful discrimination, harassment and intimidation are prohibited; and
- recruitment arrangements do not facilitate debt bondage, trafficking or exploitation.

Where recruitment agencies or labour intermediaries are used, the Company may carry out proportionate checks concerning their legitimacy and employment practices.

8. Supplier Standards

The Company expects its suppliers, contractors and business partners to:

- comply with all applicable laws concerning modern slavery, human trafficking, employment and working conditions;
- prohibit forced labour, servitude, trafficking and unlawful child labour;
- provide safe and lawful working conditions;
- pay workers lawfully and fairly;
- avoid charging workers unlawful or exploitative recruitment fees;
- maintain appropriate controls within their own supply chains;
- investigate credible allegations of exploitation;
- cooperate with reasonable due-diligence enquiries; and
- notify the Company promptly of any actual or suspected modern slavery connected with goods or services supplied to the Company.

Compliance with these standards may be included in supplier contracts where relevant and proportionate.

9. Risk Assessment

The Company will assess modern slavery risks in a manner proportionate to the nature and scale of its activities.

Relevant risk factors may include:

- the country in which work is performed;
- the nature of the goods or services;
- the use of migrant, temporary or low-paid labour;
- recruitment through intermediaries;
- complex or opaque subcontracting arrangements;
- unusually low pricing;
- excessive working hours;
- restrictions on worker movement;
- retention of identity documents;
- payment of recruitment fees;
- adverse media or regulatory findings; and
- a supplier's unwillingness to provide reasonable information.

Higher-risk relationships may be subject to enhanced due diligence.

10. Due Diligence

Depending on the level of identified risk, the Company may:

- obtain information about a supplier's ownership and operations;
- request copies of relevant labour, ethical-trading or modern slavery policies;
- verify company registration and business credentials;
- ask about recruitment, subcontracting and workforce arrangements;
- include modern slavery provisions in contracts;
- require corrective action;
- request evidence of compliance;
- monitor adverse information or regulatory action;
- review a supplier's own modern slavery statement where applicable; and
- suspend or terminate a relationship where risks cannot be adequately managed.

Due diligence will be proportionate to the risk, influence and commercial importance of the relationship.

11. Warning Signs

Possible indicators of modern slavery include:

- workers appearing frightened, withdrawn or unable to communicate freely;
- workers being controlled or accompanied by another person;
- passports or personal documents being held by an employer or recruiter;
- workers living in overcrowded or unsafe accommodation arranged by an employer;
- wages being withheld without lawful justification;
- excessive deductions or recruitment debts;

- workers being unable to leave their work or accommodation freely;
- significant discrepancies between promised and actual working conditions;
- signs of physical abuse, threats or intimidation; and
- a supplier refusing to disclose basic workforce or subcontracting information.

The presence of one indicator does not necessarily prove exploitation, but concerns must not be ignored.

12. Reporting Concerns

Any person who knows or suspects that modern slavery may be taking place within the Company or its supply chains must report the concern promptly to:

- their manager;
- a director of the Company; or
- another appropriate senior representative.

If there is an immediate danger or suspected criminal offence, the matter should also be reported to the police or another appropriate authority.

In the United Kingdom, concerns may also be reported to the Modern Slavery and Exploitation Helpline on 08000 121 700.

Individuals should not confront suspected traffickers or take action that could place themselves or a potential victim at greater risk.

13. Protection for Those Reporting Concerns

The Company encourages openness and will support anyone who raises a genuine concern in good faith, even if the concern later proves to be unfounded.

No employee or worker will suffer dismissal, disciplinary action, retaliation or other detrimental treatment for making a genuine report in good faith.

Knowingly making a false or malicious allegation may result in disciplinary action.

14. Responding to Concerns

When a concern is raised, the Company will:

- treat the matter seriously and sensitively;
- consider the safety and welfare of potential victims;
- preserve relevant information and evidence;
- avoid actions that may expose a person to further harm;
- determine whether specialist or legal advice is required;
- report matters to the appropriate authority where necessary;
- investigate the relevant business or supplier relationship; and
- take proportionate remedial or contractual action.

The Company's primary concern will be the safety of potential victims. Terminating a supplier immediately may not always be the safest response, and appropriate remediation will be considered.

15. Breaches of This Policy

A breach of this policy by an employee may constitute misconduct or gross misconduct and may result in disciplinary action, including dismissal.

The Company may suspend or terminate its relationship with any contractor, supplier or business partner that:

- breaches this policy;
- fails to cooperate with a reasonable investigation;
- conceals modern slavery;
- provides false or misleading information; or
- fails to take appropriate corrective action.

Serious matters may be referred to law enforcement or other competent authorities.

16. Training and Communication

This policy will be communicated to relevant employees, contractors and suppliers.

Training will be provided where appropriate, particularly to individuals involved in:

- recruitment;
- procurement;
- supplier management;
- contracting;
- finance; and
- overseas operations.

Training and guidance will be proportionate to the risks associated with each role.

17. Monitoring and Effectiveness

The Company will monitor the effectiveness of its approach using proportionate measures, which may include:

- completion of relevant risk assessments;
- supplier due-diligence checks;
- contractual modern slavery provisions;
- concerns reported and investigated;
- remedial actions completed;
- relevant employee training; and
- reviews of higher-risk suppliers.

The absence of reported incidents will not, by itself, be treated as evidence that no modern slavery risk exists.

18. Transparency Statement

Section 54 of the Modern Slavery Act 2015 requires certain commercial organisations carrying on business in the United Kingdom and supplying goods or services, with annual group turnover of at least £36 million, to publish a slavery and human trafficking statement for each financial year.

SO-CREATIVE GROUP LTD will monitor whether the statutory threshold and other applicable criteria are met.

If the Company becomes legally required to publish an annual statement, it will ensure that the statement:

- relates to the relevant financial year;
- describes the steps taken to prevent modern slavery in the business and supply chains;
- is approved by the Board of Directors;
- is signed by a director;
- is published on the Company's website with a prominent homepage link; and
- is reviewed and updated annually.

The Company may voluntarily publish information concerning its approach to modern slavery before it becomes legally required to do so.

19. Responsibility for This Policy

The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Management is responsible for implementing the policy and ensuring that relevant personnel understand their responsibilities.

Everyone working for or on behalf of the Company is responsible for preventing, identifying and reporting modern slavery concerns.

20. Review

This policy will be reviewed at least annually and following:

- a material change to the Company's activities or supply chains;
- an identified modern slavery incident;
- a material change in applicable legislation or guidance; or
- the identification of a new or increased risk.

Approval

This policy was approved by the Board of Directors of SO-CREATIVE GROUP LTD.

Signed:

Name: Andrew Foley

Position: Director

Date: 12.09.2025