

Modern Slavery and Human Trafficking Policy

1 INTRODUCTION

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for Human Network Ltd (trading as “Identity Group”) and sets out the steps that Identity Group has taken and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

This policy covers the Identity Group across all business operations and regions.

2 OUR BUSINESS STRUCTURE

Identity oversees a portfolio of independently managed organisations operating in the Creative, Event Management, and Business Travel industries. Each organisation maintains operational autonomy while adhering to our overarching values, ethical principles, and corporate governance framework.

3 SCOPE

This Statement sets out the commitments of our company in relation to modern slavery. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and our organisation is committed to preventing it in our business activities and ensuring that our supply chains are free from slavery and human trafficking.

4 OUR POLICIES

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner:

- Modern Slavery and Human Trafficking Policy - We operate a robust policy that ensures awareness and training across our organisation in identifying and preventing the presence of Modern Slavery and Human Trafficking in our operations.
- Recruitment Policy – We operate a robust recruitment policy, including conducting eligibility to work in the UK check for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy – We operate a whistleblowing policy that enables all employees to raise concerns about colleague treatment or questionable practices within our business or supply chain without fear of reprisals.

5 ACCOUNTABILITY

Identity takes full ownership of our Modern Slavery and Human Trafficking Statement. Below details the specific responsibilities of key aspects within it:

Any known or suspected breaches of modern slavery and/or human trafficking within the business would be investigated as a priority by Chief Operating Officer.

- The HR/People Directors are accountable for reviewing all policies in relation to our personnel.
- The HR/People Directors are responsible for identifying appropriate training on modern slavery and human trafficking that will be delivered to all employees at Identity.
- The Head of Procurement/Head of Operations for each brand is responsible for identifying and addressing any breaches of our anti-modern slavery standards within the supply chain. This is not limited to purchases of goods or services with unworkable deadlines, unrealistic cost, or commissioning work for wages below a country's national minimum.
- The Managing Directors are responsible for reporting any identified breaches promptly to the Chief Operating Officer for further action.

6 IDENTITY:

- Prohibits employees, directors, officers and representatives from engaging in threats, harassment, discrimination, or confiscating worker's original identification documents.
- Prohibits child labour, imposition of worker-paid recruitment fees, compulsory overtime and confiscation of workers original identification documents.
- Guarantees workers' freedom of movement, association and the right to resign from employment with the company.
- Provides access to remedy, compensation and justice for victims of modern slavery.
- Provides employees and managers with appropriate information and training to ensure understanding and compliance with this policy. Employees should speak to the HR / People Directors at the earliest opportunity if they feel they have not received the suitable training to adhere to this policy.

7 TRAINING

We require all employees within the company to complete a training module on Modern Slavery and Human Trafficking. This is required to be completed within the first month of joining the business and is refreshed annually. The training module covers:

- How to assess the risk of modern slavery and human trafficking in the workplace.
- How to identify the signs of modern slavery and human trafficking in the workplace.
- How to escalate potential modern slavery and human trafficking issues and concerns.
- Working conditions that could affect our supply.
- What steps our organisation should take if suppliers or contractors do not implement anti-modern slavery policies in high-risk scenarios including their removal from our supply chains.

8 DUE DILIGENCE

8.1 Within Our Organisation

Identity requires all new staff to provide proof of identity and right to work in their respective countries before employment commences. Physical checks/checks undertaken by a third-party supplier of employee's passports or birth certificates are always conducted by a HR representative in the UK and by the regional HR partner in our Middle Eastern operations. Both regions adhere to applicable local employment laws.

Identity will occasionally use reliable and dependable employment agencies to source staff. All new agencies are subject to our robust supplier screening and will be vetted against our own policies and processes before engagement, with additional verification in our Middle Eastern operations to ensure compliance with regional labour regulations and international standards.

Identity has a zero-tolerance approach to Modern Slavery and Human Trafficking and are committed to continuing to explore new training materials and method with the aim of increasing our employee's awareness of the Modern Slavery Act 2015 and to help them identify and report concerns.

8.2 Within Our Supply Chain

We engage only with suppliers and freelancers who comply with laws regarding eradication of human trafficking and slavery.

After thorough examination of our supply chain, we affirm that neither we nor any organisation within our supply chain, be it direct or indirect suppliers, engages in the use of forced labour to the best of our knowledge.

All suppliers engaged with Identity are required to adhere to our standard Terms and Conditions and [accept our Policies](#), which outline their obligations. These include, but are not limited to:

- Compliance with the Modern Slavery Act 2015 and any modern slavery and human trafficking policies instituted by Human Network and are bound by equivalent anti-slavery and human trafficking provisions within their framework agreements.
- Provision of Information upon reasonable request to verify the absence of human trafficking within the supplier's operation or extended supply chain.
- Submission of a declaration of compliance with the Modern Slavery Act 2015 when requested, in a format provided by Human Network.
- Immediate notification to Human Network, in writing and with full disclosure, upon becoming aware of any actual or suspected instances of modern slavery or human trafficking within their supply chain.

Modern slavery considerations are integrated into each stage of the procurement process. Before any supplier enters the supply chain, they must complete a Modern Slavery and Human Trafficking questionnaire covering recruitment practices, identity verification, policy documentation, working conditions, employee benefits, grievance mechanisms for both permanent and temporary workers, and evidence of practical workforce protections and wellbeing support. Responses are reviewed and a decision recorded before a supplier is added to our approved supplier list. Our Modern Slavery and Human Trafficking policy forms part of the contract with all suppliers, and they are required to confirm that no part of their business operations contradicts this policy. All Freelancers engaged within Identity are onboarded via our Freelancer Management System. During the onboarding process and prior to commencement of any work, the system ensures everyone provides proof of identity and right to work in their respective countries before engagement commences. In addition, during the onboarding process, individuals are required to review and accept the terms of our policies.

8.3 Risk Assessment

Identity has produced a high-level risk assessment identifying areas of our business and supply chain carrying the highest risk of modern slavery and human trafficking and have taken steps to assess and manage that risk accordingly. The assessment covers the domains of geography, supply chain and procurement, workforce and labour, operational and structural, governance and compliance. The assessment is intended to highlight potential risks for forced / child labour, migrant worker exploitation, document confiscation, labour exploitation, debt bondage, Forced labour, underpayment of migrant workers, Labour trafficking, undocumented workers, disguised employment, deceptive recruiting, right-to-work violations and visa sponsorship misuse.

A yearly review is conducted to reassess these risk areas, with any critical risks escalated to our Business and Group risk registers, and implement any additional measures required in line with relevant legislation.

9 KEY PERFORMANCE INDICATORS

Performance against this statement and our Modern Slavery and Human Trafficking policy is measured against the following indicators:

- All employees' submission of right to work status
- All Suppliers complete modern slavery and human trafficking questionnaire during onboarding. Answers are reviewed and escalated if not satisfactory
- All freelancers are onboarded through the management system ensuring 100% compliance with right to work
- Risk assessment review conducted annually

10 APPROVAL FOR THIS POLICY STATEMENT

This Statement was approved by the Group Board of Directors on 05/05/2026. The next review will be completed by 04/05/2027.

Name: Paul Fitzpatrick, Group Chief Operating Officer, Identity Group



11 DOCUMENT INFORMATION

Date of issue: May 2026

Date for Review: May 2027