

2026 Modern Slavery Statement – The Delta Group

INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

Slavery and human trafficking remain a hidden blight on our global society. At the Delta Group, we recognise our responsibility to be alert to the risks, however small, within our business and across our wider supply chain. We expect all colleagues to report any concerns, and management is committed to acting upon them swiftly and decisively.

SCOPE

This statement covers the financial year ending 31 December 2025 and is made pursuant to section 54(1) of the Modern Slavery Act 2015. Delta Display Limited meets the £36 million annual turnover threshold required to publish this statement; not all companies within the Delta Group individually meet this threshold. This statement applies to all trading businesses within the Delta Group, including all subsidiaries listed under Organisation's Structure below. We also expect all our suppliers to acknowledge, abide by, and adhere to this policy as a condition of doing business with us.

PRINCIPLES

Delta Group is committed to respecting human rights in all our operations and business relationships. Our commitment is underpinned by internationally recognised standards, including the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We strive to uphold these principles across our operations and supply chains. We will seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, should they occur, in a timely and appropriate manner. Furthermore, we will work to prevent or mitigate adverse human rights impacts directly linked to our operations, products, and services through our business relationships. We will also provide for, or cooperate in, their remediation through legitimate processes if we identify that we have caused or contributed to such impacts. We shall continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

OUR BUSINESS

The Delta Group is Europe's leading visual communication business, providing expert advice on, creation, production, activation, and analysis of a broad range of point-of-purchase and related visual communications across the entire in-store and out-of-store marketing value chain. The Group delivers seamless end-to-end marketing solutions, from managed studios through to print and installation. Delta Group works in close collaboration with clients and always focuses on commercial objectives. Our offering is encapsulated in the business' strategic methodology:

- Insight
- Create
- Produce
- Execute
- Optimise

ORGANISATION'S STRUCTURE

The Delta Group consists of a number of Companies based within the UK; these include:

- Delta Display Limited
- Delta Creative (formerly Lick Creative Ltd and Zone)
- Digital Viscom
- Odessa Print Group
- Superior Creative Services
- Feref Limited

OUR SUPPLY CHAINS

Our supply chain is diverse, encompassing the sourcing of raw materials (e.g., paper, inks, plastics), manufacturing components, and services (e.g., logistics, installation). The majority of our suppliers are based in the United Kingdom, which we recognise as a lower-risk operating environment. However, we acknowledge that certain materials or sub-tier supply chains may have international origins and that some regions or specific raw materials may present a higher risk of modern slavery due to factors such as prevalent labour practices or governance issues. We are committed to understanding and addressing these specific risks within our tier 1 and, where feasible, lower tiers of our supply chain.

HUMAN RIGHTS IN OUR OPERATIONS & SUPPLY CHAINS

Policies on Slavery & Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our operations or supply chains.

Due Diligence Process for Slavery & Human Trafficking

As part of our initiative to identify and mitigate risk, we implement a multi-faceted due diligence process. This includes:

- Supply Chain Mapping: We are working to map our key direct (Tier 1) suppliers to understand the geographic and sectoral risks associated with their operations.
- Risk Prioritisation: We prioritise our due diligence efforts based on factors such as country risk (e.g., using credible external indices), sector risk, and the nature of the goods or services provided.
- Supplier Risk Assessment: For new and existing suppliers, particularly those identified as higher risk, we conduct initial and ongoing risk assessments, which may include self-assessment questionnaires, third-party audits, or on-site visits.
- Supplier Evaluation Questionnaire: This questionnaire is designed to gain a better understanding of our supplier's stance on their Company background and capacity, financial stability, quality management, environment and social responsibility and compliance and security.
- Where viable, we manufacture in-house to ensure optimum control of the work environment.

- Where possible, we build long-standing relationships with local suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect our direct suppliers to not only adopt 'one-up' due diligence but also to actively encourage and support their own suppliers in implementing robust anti-slavery policies and due diligence processes. We may request evidence of their efforts to cascade these expectations down their own supply chains.
- Adherence to our Anti-Slavery Policy and our broader human rights principles is a fundamental requirement for all new and existing suppliers. This is integrated into our supplier selection and onboarding processes.
- Our Anti-Slavery Policy and human rights expectations are made clear to all of our suppliers and contractors. Breach of these terms may lead to review and potential termination of the business relationship.
- We have in place systems to encourage the reporting of concerns and the protection of whistleblowers.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. Our internal Code of Conduct clearly outlines the expected actions and behaviours for all individuals working for and representing The Delta Group. Furthermore, we maintain a dedicated Supplier Code of Conduct which explicitly communicates our expectations regarding human rights, labour practices, and ethical conduct to all our business partners. Adherence to this Code is a mandatory requirement for all our suppliers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking, we provide targeted training to key personnel. This includes, but is not limited to, our procurement teams, HR staff, and relevant senior management. Training modules cover topics such as identifying modern slavery risks, our due diligence processes, reporting mechanisms, and the importance of ethical business conduct. All Directors receive comprehensive briefings on this subject.

Effectiveness in Combating Slavery & Human Trafficking

We use the following key performance indicators (KPIs) to measure and improve our effectiveness in combating modern slavery and human trafficking:

- **Supplier Due Diligence Completion:** Percentage of high-risk tier one vendor partners who have completed our self-assessment questionnaire and/or undergone an initial site inspection/audit.
- **Audit Outcomes & Remediation:** Number of non-conformities related to modern slavery identified during supplier audits and the percentage of these non-conformities for which effective corrective actions have been implemented.
- **Internal Compliance:** Regular internal audits of our labour monitoring and payroll systems to ensure compliance with working hour regulations, minimum wage, and fair employment practices across our own operations.

- Training Completion: Percentage of targeted employees (e.g., procurement, HR) who have completed modern slavery and human trafficking training.
- Grievance Mechanisms Utilisation: Number of concerns reported via our internal and external grievance channels related to modern slavery, and their resolution status.
- Contractual Adherence: Percentage of new and renewed supplier contracts that explicitly include our modern slavery clauses and adherence requirements.

Recruitment, Working Hours, and Freedom of Association

We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will. We ensure that working hours are tolerable, comply with the law/regulations and are in line with working time directives and industry standards. Every employee at the Delta Group is free to belong to and to participate in the activities of any association, society, organisation, club or group without censure or disciplinary action by the Delta Group/Employer, subject only to the limitation that such membership and activity shall not interfere with the performance of the employees' responsibilities, duties, or work obligations. At the Delta Group we only use specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Child Labour

The Delta Group will not tolerate the use of child or forced labour within its operations or facilities. We will not accept the exploitation of children, their engagement in unacceptable or hazardous work, and the physical punishment, abuse or involuntary servitude of any worker. We expect our suppliers and contractors to uphold the same standards. Any breaches of these principles which become known to the Delta Group could lead to the discontinuing of the business relationship. Any internship, work placement or seasonal employment of young people will be coordinated with their school or educational facility ensuring that they are closely supervised and that their morals, safety, health and compulsory education are not compromised in any way.

Child Labour Remediation

In the event a child worker is found within the Delta Group or its supply chain, our remediation actions will always prioritize the best interests of the child, determined in consultation with the child, their family, and relevant local authorities or child protection experts. Our remediation framework includes, but is not limited to, the following steps:

- Explaining to the child why they should not be working, or why they cannot work in the job role.
- Talking through with the child what would happen to their role, their employment status, their income etc.
- Supporting them through this process ensuring that they understand the reason that they should not be working.
- Offering support via the Employee Assistant Programme including counselling services, legal advice etc.
- Ensuring the child has the appropriate protections as required by local law, to ensure their rights are upheld.

- If there is evidence of criminal activity or trafficking the appropriate authorities would be informed, the child should be placed into the care of the local authorities for their safety.
- If a young worker is found to be working in hazardous conditions, or involved in night work, explain to them why they cannot work in that role, and an alternative position should be found which meets the criteria for the employment of young workers.
- Whilst any investigation is ongoing, ensure that the child is not at a financial loss; ensure that compensation is being paid for any lost earnings and other costs such as accommodation, food and utilities.
- If appropriate discuss the process for a return to the job role when they are no longer a child.
- If possible, offer the job to an adult member of the family so that the family income is retained.
- Ensuring that a focus is placed on supporting the child, the company and the supplier if appropriate.
- Follow up with suppliers if appropriate - for example - recruitment & training to address gaps in the hiring process which have allowed the child to start work on-site. How to verify the right to work and ID documentation to confirm an applicant's age.
- Ensuring that the supplier carries out a Root Cause Analysis to understand how the child was able to start working on-site. This should aim to understand the child's recruitment pathway and the gaps in the hiring process that enabled them to access employment. Where appropriate, we will seek guidance and support from relevant non-governmental organisations or child protection agencies to ensure comprehensive and child-centric remediation.

Worker Remediation within Our Own Operations

Should a case of modern slavery, forced labour, or human trafficking be identified or suspected within our own workforce, the Delta Group is committed to acting promptly and placing the welfare of the individual at the centre of our response. Our approach to remediation for adult workers includes the following steps:

- Immediately ensuring the individual is safe and not at further risk of exploitation or harm.
- Referring the individual to the UK National Referral Mechanism (NRM), the government's framework for identifying and supporting victims of modern slavery or signposting them to relevant specialist support organisations.
- Providing access to support through our Employee Assistance Programme (EAP), including counselling, legal guidance, and practical assistance.
- Ensuring the individual does not suffer financial detriment as a result of the situation, including making arrangements to protect their income and any other entitlements during any investigation.
- Reporting to the relevant authorities, including the police, where there is evidence of criminal activity or trafficking.
- Conducting a thorough root cause analysis to understand how the situation arose and implementing appropriate corrective measures to prevent recurrence.

Communication and Grievance Mechanisms

We encourage staff to communicate with us and have various platforms to make this happen to ensure we have open and direct lines of communication with management throughout the business.

- Employee elected representatives can raise any concerns with our Senior Management Team, via community meeting forums that takes place every quarter.
- We also have a 'Your View' survey that is released every year, this is anonymous, confidential, and managed by IBP, an independent external provider. The aim is that the 'Your View' survey lets us know how staff feel about working for the Delta Group and drives actions and initiatives that make here a better place to work. It's important to get as many responses as we can from our employees across the Group so we have a few ways that staff can submit this.
- In addition to this we hold health and safety committee meetings to engage with employees on any concerns they have relating to any H&S matters.

We operate an open line of communication practice at the Delta Group where everyone can easily raise issues to feel heard and supported. This workplace standard allows for communication and trust throughout the company. We are committed to providing accessible and effective grievance mechanisms for all our employees, suppliers, and other stakeholders. In addition to internal channels, we maintain an external, confidential, and anonymous whistleblowing platform managed through our Employee Assistance Programme (EAP) provider for reporting any concerns related to modern slavery or other unethical behaviour. This ensures that concerns can be raised without fear of retaliation and provides a clear pathway for remediation. All genuine concerns raised in the public interest will be investigated thoroughly, and individuals protected from victimisation.

Grievance and Process to Make Things Right

Where a human rights violation, including modern slavery, is identified, we are committed to investigating thoroughly, supporting justice for the victim, and ensuring effective remediation. This includes addressing the root cause to prevent reoccurrence and providing appropriate remedies for those adversely impacted. Staff can report any unethical behaviour anonymously should they feel it cannot be resolved locally or for which the normal internal process is not suitable. Anyone raising a genuine concern which is in the public interest will be protected from victimisation. Third parties (including suppliers) can also follow our processes to report.

Equality and Dignity at Work

The Delta Group does not condone any form of inequality, non-Inclusion, harassment, or bullying and is committed to encouraging equality, diversity and inclusion amongst our workforce and eliminating any unlawful discrimination, our aim is for our workforce to be truly representative of all parts of society and for each employee to feel respected and able to give their best. The purpose of our policy is to inform staff of the type of behaviour that is wholly unacceptable and to explain what options there are if anyone is to suffer from inequality, non-inclusion, harassment or bullying at work, this includes whether it's during training, recruitment and/or working conditions etc. The process and options are outlined in our equality, diversity and inclusion policy. In addition to this the Delta Group also has a zero-tolerance approach to modern slavery in our organisation and our supply chains and disallows 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 detailed and communicated to all employees in our employee handbook. All disciplinary measures are logged and handled accordingly.

Internal Processes to Prevent the Use of Child Labour within the Company

- Educating employees on child labour and human trafficking.
- Ensuring that hiring managers avoid hiring minors under the legal age of working.
- Ensuring that Managers understand the policy and legislation on minimum wage and working hours.
- As part of the recruitment process checking and retaining as part of the right to work process, - documents verifying an employee's age and ID.
- Conducting checks on employees' salaries, right to work and working hours during HR / Company audits to ensure that these are in line with the relevant minimum wage and working time legislation.

Code of Conduct and Discipline

We at the Delta Group make it clear of the actions and behaviours expected from all individuals when working and representing the Organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour. Any member of staff failing to adhere to our Anti-slavery policy, or being involved in the threat of physical, sexual or any other abuse or other forms of intimidation will be subject to our disciplinary sanctions, which will be managed in line with our disciplinary process and policy.

CONCLUSION

Slavery and Human Trafficking are serious crimes; therefore, the Delta Group is pleased to submit this policy and our statement outlining our commitment.

IMPLEMENTATION AND APPROVAL

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the CEO and Executive Board. The CEO, HR department, and Compliance team will review and update it annually to ensure its continued relevance and effectiveness. Our Human Rights Policy and this Anti-Slavery Statement are accessible to all staff via our HR System and are publicly available on our corporate website for other interested parties, or upon request.

Signed:

A handwritten signature in black ink, appearing to read 'Jason Hammond', written over a light blue horizontal line.

Jason Hammond | Chief Executive Officer

The Delta Group

15th of May 2026