

Modern Slavery, Forced Labour, and Child Labour Statement

ZPG Limited Group (Including Inspop.com Limited, Uswitch Limited, and Zoopla Limited)

Financial Year Ended: 31 December 2025

ZPG Limited is committed to upholding human rights and maintaining the highest ethical standards. We strive to combat **all forms of modern slavery**, including **forced labour, child labour, human trafficking, and bonded labour** across our business and supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

1. Organisation Structure and Supply Chains

Our Business

We own and operate some of the UK's most trusted digital platforms including (but not limited to): Hometrack, Money.co.uk, Confused.com, Mojo Mortgages, Alto Software Group, PrimeLocation, Tempcover, Uswitch and Zoopla.

We create value by investing in marketing our brands and growing our audiences, and by developing the best products and platforms in order to engage our consumers and partners.

Consumers increasingly use and rely on our platforms in search of real-time information about the property and comparison markets. Similarly, property professionals, lenders, intermediaries and home services suppliers use our platforms to reach a transaction-ready audience and market their products and services.

Subsidiaries Covered

We have published this group statement in accordance with section 54 of the Modern Slavery Act 2015 (the "Act") on behalf of ZPG Limited and all of its subsidiary undertakings (collectively referred to as "we", "us" or "our").

We recognise the importance of a group-wide approach to preventing modern slavery and human trafficking in supply chains.

Supply Chains

Our supply chains are primarily service-based but contain risks in the procurement of technology and facility services. We classify our supply chains as follows:

Supply Chain Category	Nature of Goods/Services	Potential Risk Areas
Technology	External data centres, IT infrastructure, hardware, and software providers.	Forced Labour and State-imposed exploitation in technology manufacturing countries.
Facilities	Maintenance, cleaning, and on-site security services.	UK labour providers ; risk focus on Wage Theft, Debt Bondage, and Migrant Worker exploitation .
People	Recruitment and training services.	Adherence to applicable laws and regulations including the Employment Rights Act 1996, National Minimum Wage Act 1998 and The Health and Safety at Work Act 1974 .
Professional Services	Advisory, consultancy, and marketing services.	Low risk due to professional nature.

2. Policies in Relation to Slavery and Human Trafficking

Our commitment is guided by the **UN Guiding Principles on Business and Human Rights** and the fundamental conventions of the **International Labour Organisation (ILO)**. We maintain the following core policies:

- **Supplier Code of Conduct:** This document explicitly sets a **zero-tolerance approach** to **forced labour, child labour, human trafficking**, the use of recruitment fees paid by workers, and the withholding of personal identification documents.

- **Whistleblowing Policy ("Speak Up" Policy):** This policy encourages all personnel, including employees, contractors, and supplier workers operating on our sites, to report any suspicions of modern slavery via an external and independent 24/7 confidential reporting facility. The policy ensures that no individual will be penalised for reporting issues.
- **Working with Third Parties Policy:** This policy designed to help identify bribery, corruption and modern slavery risks associated with third parties who provide services on ZPG's behalf or who are potential targets for acquisition.
- **Sanctions Policy:** This group-wide policy outlines our risk assessment process and approach to ensure compliance with sanctions laws when working with third parties.
- **Contractual Clauses:** Group-wide template clauses are mandatory in appropriate contracts, requiring formal commitment to, and compliance with, all applicable anti-slavery legislation.

3. Due Diligence Processes

We conduct due diligence on our suppliers by requesting information from them (which includes information about the steps they take to ensure there is no modern slavery or human trafficking in their business or supply chains). We keep our due diligence processes under regular review.

Further, during the supplier onboarding process, all new suppliers must complete an onboarding questionnaire that includes a self-declaration and screening against sanctions lists and adverse media checks.

We consider key suppliers' responses to our due diligence requests as part of our decision making processes when it comes to using new suppliers. We take appropriate action and, if necessary, delay or cancel appointing a new supplier unless the supplier's systems and controls are satisfactory.

4. Risk Assessment and Management

Governance

The **ZPG Limited Board-level Risk Committee** holds ultimate responsibility for reviewing and managing modern slavery risk on a quarterly basis.

Risk Management Actions

Due to the nature of our businesses, our supply chains are limited and we operate with only a small number of suppliers.

Risk Identification: Our supplier onboarding, sanctions and adverse media check process helps us to identify any significant risks which inform our decision-making and reduce our exposure to modern slavery risks. The risk committee, People and Procurement teams remain vigilant to potential emerging risks across our existing supply chain.

Risk Assessment and Management: When risks are identified, the Risk Committee and other relevant stakeholders will assess the risks based on their severity and remediability. An appropriate risk management plan will then be developed.

This may require us to seek contractual assurances from key suppliers in relation to modern slavery and human trafficking compliance, particularly where those suppliers operate in, or make us part of, supply chains that present higher risks of modern slavery or human trafficking. If satisfactory assurances cannot be obtained, we may discontinue our relationship with the supplier to mitigate exposure.

5. Key Performance Indicators (KPIs) to Measure Effectiveness

We use the following KPIs to measure the effectiveness of our actions against our goals:

- Investigate any reports of modern slavery or human trafficking received by the Group
- 100% of new suppliers to undergo a sanctions and adverse media check
- Monitor employee compliance training completion
- Continue to ensure all appropriate risk assessment processes in relation to supplier onboarding are performed

6. Training on Modern Slavery and Trafficking

Our training program is designed to build awareness across the organisation and specific technical knowledge in high-risk functions:

- **Mandatory General Awareness:** All employees receive induction training including an outline of our key policies. Key policies are hosted on our intranet sites and employees are reminded of their responsibilities. Where relevant, compliance related matters are highlighted to all employees through our regular employee communication channels.
- **Employee Code of Conduct:** Employees are also expected to adhere to the employee code of conduct which outlines our business values of integrity, transparency, accountability, inclusion and compliance with applicable laws and regulations, including those related to modern slavery.

- **Specialised Procurement Training:** Employees working directly in procurement functions are required to undertake enhanced ethics training covering key issues including human rights and corruption.

Board Approval

This statement was approved by the ZPG Limited Board of Directors on 30 June 2026.