



## Modern Slavery and Human Trafficking Statement

*Owner: Tamsin Ashmore*

*Document No: G-105*

This statement is published jointly by This is Gain Global Ltd (company number 11384253), registered at Avalon, Oxford Road, Bournemouth, England BH8 8EZ and its wholly-owned UK subsidiary This is Gain Ltd (company number 16068670) registered at Avalon, Oxford Road, Bournemouth, England BH8 8EZ, under section 54 of the UK Modern Slavery Act 2015 and equivalent supply chain transparency laws in the other jurisdictions in which the GAIN group of companies ("GAIN") operate. Both entities are commercial organisations within the meaning of section 54(2) of the Act, carry on business in the United Kingdom and meet the applicable annual turnover threshold. This statement sets out the steps we have taken during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in our business and supply chain. We have zero tolerance for modern slavery in any form.

## Our Business and Supply Chain

GAIN is a creative-led, insight-driven group that blends data, technology, and creativity to help our clients move forward. We operate across six core areas of expertise: Experience, Conversion, Innovations, Performance, Creative Studios, and Customer Science. Our clients span the public, private, and not-for-profit sectors.

GAIN is headquartered in the United Kingdom with offices in London, Bristol, Manchester, Bournemouth, and Portsmouth, in Barcelona (Spain), Manila (Philippines), Vancouver (Canada) and Mumbai (India), and an entity in the United States. In the reporting period, we employed approximately 650 people.

Our supply chain reflects the nature of an integrated creative and technology group with approximately 500 direct suppliers active during the reporting period. The majority are based in the United Kingdom, the United States and Europe. Our principal categories of supplier are:

- **Temporary creative, production, consultant and technology talent**, engaged either directly or through specialist agencies on a project-by-project basis;
- **Production and events partners**, providing crew, locations, and equipment for shoots, events, and influencer activations, typically engaged for specific projects;
- **Technology and software vendors**, including cloud, SaaS, and analytics platforms, typically engaged under multi-year framework agreements;
- **Media, data, and research providers**, supporting our paid media, customer science, and insight work, engaged through a mix of preferred-supplier arrangements and project contracts;
- **Facilities and office services suppliers**, including cleaning, catering, security, and maintenance at our offices, typically engaged on rolling contracts;
- **Recruitment agencies and contingent labour providers**, supporting permanent hiring and short-term resourcing across our locations;
- **Professional services**, including legal, audit, finance, and training, engaged on a retainer or project basis.

We recognise that every company, no matter the industry, is at risk of being involved in MS through its own operations and its supply chain.

At GAIN, we are committed to aligning our approach with the United Nations Guiding Principles on Business and Human Rights. We are also guided by other internationally recognised frameworks, such as:

- The International Labour Organisation's Declaration of Fundamental Principles and Rights at Work;
- The International Bill of Human Rights, which includes the UN Declaration of Human Rights

## Our memberships and standards

GAIN's commitment to ethical business is reflected in the industry bodies we are members of. We are working towards becoming a Sedex B (supplier) member, which means we open ourselves to independent ethical audit through SMETA. We are also members of

the Market Research Society (MRS), whose code of conduct sets ethical standards for how we treat research participants and partners, and the British Interactive Media Association (BIMA), whose code addresses fair treatment of freelancers and contractors, industry awareness, networking and community connections.

## Policies and Risks

Our approach is set out in our Modern Slavery and Human Trafficking Policy and our Supplier Code of Conduct, supported by our Whistleblowing Policy and our Anti-Harassment Policy. All are available to employees via our internal intranet.

We refresh our risk assessment annually. The principal modern slavery risks for GAIN, given the nature of our business, are:

- **Freelance, contractor, and production talent.** Whether it's a freelance designer we bring in directly, a developer placed by a recruitment agency, or a production crew engaged by a partner for a shoot or event, a lot of the people working on GAIN projects are not employed directly by us. The risk is that an agency or production partner we work with could be treating its people badly — charging them to get work, holding back their pay, or controlling where else they can work. We're tightening how we engage these partners to make sure that doesn't happen.
- **Office services.** The people who clean, cater, and provide security at our offices are often employed by other companies on our behalf. These types of jobs carry a higher risk of exploitation, particularly where agency or migrant labour is involved, so we pay close attention to who we work with.
- **Suppliers in higher-risk countries.** Some of the countries we operate in or buy from have weaker labour protections than others. We give our own employees in India and the Philippines the same standards we apply everywhere, and we take extra care when choosing suppliers based in those markets.

### What We Did This Year

During the reporting period we:

- Reviewed and improved our risk assessment process, refreshing how we identify and categorise modern slavery risk across our business and supply chain.
- Strengthened our supplier selection process. Suppliers are now risk-categorised at the point of onboarding, and ESG and social value are checked and approved as part of selection — particularly for the freelance, production, office services, and overseas supplier categories where we see the highest risk.
- Refreshed our policies and reporting channels in line with the UK Worker Protection Act 2023.

## Training

Modern slavery training is mandatory for all GAIN staff. The training covers what modern slavery is, who is affected, spotting the signs and how to raise a concern, and the protection in place for anyone who does so in good faith. It is delivered through an online module assigned at induction and refreshed annually, with completion tracked through our learning management system and reported to senior leadership. We review the training content each year to reflect new legislation, emerging risks, and lessons learned.

## Effectiveness and Next Year's Priorities

For the reporting period, our key indicators are:

- 90% of staff trained on modern slavery;
- 90% of new suppliers risk-categorised at onboarding;
- That our reporting channels are live, accessible, and known to staff and suppliers;
- Became a Sedex B (supplier) member, opening GAIN to independent SMETA ethical audit and giving our clients greater visibility of our standards.

In the year ahead we will continue to embed our updated supplier selection process, work towards a strong SMETA score, extend training to new joiners and managers in higher-risk roles, and review the effectiveness of our reporting channels.

## Remediation

No instances of forced or child labour have been identified in GAIN's operations or supply chain during the reporting period. If any were to be identified, GAIN would act immediately to ensure the safety of any worker affected, provide or support appropriate remedy (which may include reimbursement of unpaid wages or recruitment fees, return of identity documents, and access to medical or legal support), and work with our supplier to ensure the issue is addressed at root rather than ended through disengagement.

## Approval

This statement is published under section 54 of the UK Modern Slavery Act 2015 on behalf of both This is Gain Global Ltd and This is Gain Ltd. It also serves, where applicable, as the annual report of the relevant Gain group entity under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024.

It was approved by the Board of This is Gain Global Ltd on 18 May 2026 and by the Board of This is Gain Ltd on 19 May 2026, and is signed by Tamsin Ashmore, a director of both companies, on behalf of both Boards.

Name: Tamsin Ashmore

