

Jellyfish Modern Slavery Statement

1. Statement

This Modern Slavery Statement is made on behalf of the global Jellyfish group of companies referred to as ("Jellyfish", "we", "us" or "our"). This statement is made in recognition of our commitment to prevent modern slavery, human trafficking and protect human rights in our business operations, in compliance with the relevant laws and regulations across our global businesses.

Jellyfish is a digital marketing agency offering marketing services ranging across PPC, SEO, Social, Analytics, Programmatic, Display and Video. We employ over 2,000 personnel globally (EMEA, APAC, US) with our Head Office based in the United Kingdom

Given the nature of our digital marketing business model, the risk of modern slavery in our business is fairly low to be directly affected by modern slavery and/or human trafficking. However we will still not tolerate any form of modern slavery across our business operations and supply chains. We have put measures in place to maintain awareness and prevent our business from becoming a part of any form of slavery, human trafficking and to respect human rights in our corporate activities. We take a robust approach against modern slavery and our commitment to the respect for human rights and the prevention of human trafficking is part of our Corporate Social Responsibility.

Detailed Modern Slavery Policy can be found at this website link:

<https://www.jellyfish.com/en-us/modern-slavery-act>.

As Jellyfish continues to grow, we re-evaluate the risks in any new markets to ensure high ethical standards are deployed and maintained with any new businesses that become a part of the Jellyfish group of companies.

This statement is made on behalf of Jellyfish Digital Group Limited and its group companies in the United Kingdom (Jellyfish) pursuant to section 54 (1) of the Modern Slavery Act 2015 (the "Act") and is our anti-slavery and human trafficking statement.

We set out in this statement what we do to reduce the risks of modern slavery and the steps we put in place to ensure that there is no form of slavery or human trafficking within our own business and/or through any supply chain we use. This statement relates to actions and activities during our financial year 1 January 2022 to 31 December 2022.

Jellyfish recognizes that it has a responsibility to prevent any form of modern slavery connected with its business. We take a robust approach to prevent slavery and human trafficking and are committed to doing so in our corporate activities and through any of our Suppliers.

2. Organizational structure

Jellyfish Digital Group Limited is a company registered in England and Wales (12280757).

3. Our approach

Jellyfish strives to work to the highest professional standards and comply with all laws, regulations, and rules relevant to our business.

We work with our employees together with the support of our legal, compliance, and procurement functions to maintain modern slavery awareness, manage concerns or breaches to allow us to take any preventative or immediate action as required.

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine the right to work. Employees also receive an induction which explains all Jellyfish company policies and employees can contact the People Team confidentially on any matters of concern. Our policies are stored and published digitally, and therefore readily available. We are also able to easily recirculate any changes or on set cadences.

We expect all Jellyfish employees to conduct business with honesty, integrity and to comply with the law.

4. Relevant policies

Given the nature of our digital marketing business model, we consider the risk of modern slavery in the services is fairly low to be directly affected by modern slavery and/or human trafficking

Nevertheless, Jellyfish employee awareness and training will help compliance with the Modern Slavery Act so we can identify, prevent breach and maintain compliance in our business operations. Jellyfish works to maintain high professional and ethical standards and ensure that its employees play a part in maintaining these.

All employees are provided with a written contract of employment and are required to adhere to Jellyfish company policies available on the company intranet.

We do not tolerate any form of modern slavery or human trafficking in any part of our business and we will take firm action against any form for slavery that we may become aware of as may be associated with our business without our knowledge.

5. Due diligence

Sustainable procurement is an integrated value in our supply chain management. We seek to trade with suppliers who match and complement our ethical standards and organisational values whilst seeking to minimise the environmental impacts arising from the delivery of their goods or services. We are committed to the following:

- Mapping the supply chain to assess particular product or geographical risk
- Entering into business relationships with suppliers that reflect our organisational values.

Supplier responses are taken into consideration when short-listing and we make any concerns known to the supplier. Should suppliers fail to live up to our expectations or be unwilling to make any changes we may cease to engage with them

6. Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- Requiring all employees to complete mandatory training on Modern Slavery as a module within our onboarding programme within the first 3 months of their employment.

Further steps:

We will be looking to introduce specific measures to ensure that our obligations under the Act are passed through our supply chain.

These will include:

- Obtaining contractual obligations for conformance to the Modern Slavery Act
- Improving supplier due diligence to ensure Modern Slavery compliance anywhere in the supplier's business or by any of the suppliers in its supply chain and that all necessary processes and policies have been put into place to ensure that this remains the case
- Obtaining a contractual right to request compliance-related information and the right to audit suppliers at our discretion
- Ensuring risk areas are documented, monitored and taken into consideration in any future contract renewals
- Assessing supply chain level information and engaging directly with suppliers to set up systems that provide reliable supply chain information, especially for the most at-risk jurisdictions
- Recording and monitoring employee acceptance and understanding of the company policies

7. Training

Relevant e-learning training materials are available to all staff via our Learning Management System. We require all employees to complete compulsory modules on Modern Slavery and Human Trafficking within our onboarding program within the first 3 months of their employment.

Our modern slavery training covers:

- The background and scale of Modern Slavery and Human Trafficking
- The role of Human Trafficking in Modern Slavery
- Examples of different types of slavery
- The laws and regulations associated with Modern Slavery
- Identifying forms of Modern Slavery
- How and when to raise concerns regarding Modern Slavery
- Advice and guidance for dealing with child victims of Modern Slavery
- Advice and guidance for working with adult victims of Modern Slavery
- Signpost to resources about Modern Slavery and Human Trafficking

This statement has been approved by the CEO of the Jellyfish Digital Group Limited and will be updated and reviewed annually.

DocuSigned by:

24C45793552B4B0...

Name: Rob Pierre
Position: VP +
Date: 15-Mar-2023