



Anti-slavery and Human Trafficking Statement



1 Opening statement from senior management

- 1.1 Juice Immersive Ltd is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers.
- 1.2 *Juice Immersive's commitment to ensuring there is no slavery or trafficking within the organisation, or within its supply chain, is steadfast. The culture of honesty, openness and mutual care within the business, as well as our team living the company values of authenticity, collaboration and trust, have ensured a zero tolerance and high-awareness approach to slavery and human trafficking has been adopted.*

Owen Cotterell, Co-Founder & Creative Director

2 Structure of the organisation

- 2.1 Juice Immersive Ltd is a professional XR services specialist in the immersive technology sector.
- 2.2 It is private limited SME and employs 3 people worldwide with business operations primarily in the UK, but clients and projects in Europe, North America and beyond.
- 2.3 Juice Immersive Ltd has a global annual turnover of £500,000. To find out more about the nature of our business, please click <https://www.juiceimmersive.com>
- 2.4 In order to deliver industry-leading XR projects, products, experiences and strategies, we work with a range of suppliers including technical XR studio partners, freelance developers, associate technologists and consultants.

3 Policies

- 3.1 As part of our specific commitment to combating modern slavery and human trafficking, we have implemented the following policies:
- 3.1.1 Juice Immersive Anti-Slavery Policy
- 3.1.2 Juice Code of Business Conduct - outlines how we are committed to acting ethically in all aspects of our business and to maintaining the highest standards of honesty and integrity. We specifically reference the Modern Slavery Act to highlight how seriously we take this issue. All of our people are required to uphold our Code of Business Conduct.
- 3.2 We also make sure our suppliers are aware of our policies, and adhere to the same high standards:
- 3.2.1 Our Code of Business Conduct - Supplier Version sets out our expectations of suppliers and is based on the above Code of Business Conduct that applies to all our companies and people. The supplier version includes requirements for labour practices (such as anti-harassment and discrimination, and health and safety), human rights (including no child, forced or bonded labour), and social impacts (such as anti-bribery and corruption) as well as other sustainability issues. The principles of the Code are embedded in our training courses.



- 3.3 These policies have been developed by Juice Immersive's senior leadership team in Q1, 2025 with the support of the Institute of Directors and the legal professionals at LexisNexis. These policies are set within a wider ethical framework which includes our Human Rights Policy Statement, Anti-bribery and foreign corrupt practices Policy and our Sustainability Policy. These policies outline our positive contribution to society and the environment underpinned by our responsibility to respect human rights.

4 Due diligence

- 4.1 As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, We do not tolerate any form of modern slavery or human trafficking in any part of our business. As well as compliance with the codes described above, we continue to require our suppliers to comply with all applicable laws, including modern slavery laws and to have suitable practices and procedures in place to ensure that human trafficking and slavery does not take place in their organisations or their supply chains. We enforce a strict code of compliance and do not tolerate slavery or human trafficking within our supply chains. We monitor our suppliers on an ongoing basis and will immediately seek to terminate our relationship with any suppliers who we believe may be involved in modern slavery or human trafficking.
- 4.2 We have identified all of our major suppliers and carried out a risk assessment in relation to these suppliers. This assessment concluded that these suppliers are very low risk from a modern slavery perspective. We have updated our standard supplier terms and conditions to ensure contractual obligations are included to cover modern slavery and sustainability requirements.
- 4.3 Our due diligence procedures are designed to:
- 4.3.1 establish and assess areas of potential risk in our business and supply chains;
 - 4.3.2 monitor potential risk areas in our business and supply chains;
 - 4.3.3 reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
 - 4.3.4 provide adequate protection for whistleblowers.

5 Risk management

- 5.1 Juice Immersive regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by auditing the company's Register of Approved Suppliers and updating with newly acquired standards and policies evidenced by the suppliers upon request. Modern slavery risk management is built into Juice Immersive's Supply Chain Management protocols.
- 5.2 We do not consider that we operate in high-risk sectors or locations because Juice Immersive operates a relatively flat supply chain, engaging primarily technical studio partners with whom our team work very closely – often getting to know the individual team members on a personal level as well as having close working relationships with fellow founders. The creative and digital sector,



in which we operate, and the XR industry within it, is not known for employing low-paid workers or vulnerable to modern slavery practices.

- 5.3 Where we have identified a potential risk, the business activates a documented protocol that includes extensive due diligence, procurement practice review and improvement and increased levels of industry collaboration, particularly leveraging our memberships of associations such as BIMA (British Interactive Media Association) and relationships with UK government organisations such as Innovate UK and Business Growth (from whom we have received grant funding and growth support respectively).
- 5.4 We ensure all our suppliers adhere to our Modern Slavery Policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

6 Effectiveness and KPIs

6.1 We use a number of key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains, including KPIs regarding:

- 6.1.1 training our staff about modern slavery issues;
- 6.1.2 contacting our suppliers to seek information about their employee rights awareness training procedures or employee contracts;
- 6.1.3 regular auditing of our approach to managing the risk of modern slavery.
- 6.1.4 We continued with our review of our procurement processes and systems and in 2024, we carried out a wider programme review with full engagement of the Board and Senior Leadership Team.

7 Training

- 7.1 We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy.
- 7.2 Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.
- 7.3 Examples of training courses we have delivered over the past year include:
 - 7.3.1 BrightHR Modern Slavery eLearning Course – with CPD Certification



8 Details of other steps taken

- 8.1 We have established governance processes and policies to help us manage human rights risks, including modern slavery, consistently across Juice Immersive and our supply chains, collaborator network and strategic partners.
- 8.2 In 2024 we set up a Risk and Compliance Committee to meet on a monthly basis to monitor compliance with all applicable laws, including in respect of our modern slavery obligations.
- 8.3 The Board, assisted by the Risk and Compliance Committee, has oversight and responsibility for our approach to risk management which is driven by our culture based upon the principles set out in our Code of Conduct.
- 8.4 In 2024, we also communicated our new governance policies to all of our staff.

9 Further actions and sign-off

- 9.1 Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:
 - 9.1.1 continuing to build effective governance,
 - 9.1.2 providing more training,
 - 9.1.3 re-assessing our procurement processes to ensure compliance with our policies.
- 9.2 This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Juice Immersive's slavery and human trafficking statement for the financial year commencing 01.11.2024 and ending 31.10.2025.
- 9.3 This statement was approved by the Board on 28.02.2025.

Signed: 

Owen Cotterell, Co-Founder & Creative Director

Juice Immersive Ltd

Date: 28.02.2025