

# APS Group Statement on Modern Slavery

Version 10 (Reporting Period: 1st April 2025 to 31<sup>st</sup> March 2026)

## Introduction

APS Group is an international marketing services business providing integrated communications and customer experience programmes to local and global brands.

The customer solutions we deliver are underpinned by a broad range of services supported by great people, enabling technology and significant infrastructure. The core service offering includes strategy, content creation and content management, multichannel output management and associated logistics.

This statement is made pursuant to section 54(5) of the Modern Slavery Act 2015 and constitutes APS Group's commitment to adherence to the Act. Our statement also draws upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

## Our Principles

We will:

- aim to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do, in a timely and appropriate manner.
- seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products, and services through our business relationships.
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts.
- continue to look for ways to support the promotion of human rights within our business.

Though slavery was abolished in the UK more than 200 years ago, exploitation continues. We know that this abhorrent practice still continues today in one form or another in every country in the world, in the form of human trafficking, forced and bonded labour plus other kinds of slavery.

We adopt a zero-tolerance approach to any such activities within our own business or within our supply chain and we will take appropriate steps to ensure we provide a working environment where individuals' fundamental rights and freedoms are respected.

The following sets out 8 key obligations to which APS Group will adhere and describes how we will continue to ensure that steps are taken to embed into the culture of the business appropriate systems and controls in order to prevent slavery and human trafficking in the United Kingdom and across our global companies.

### 1. Organisation Structure and Supply Chains

APS Group operates as a global provider of marketing, print, and creative solutions. Our supply chain spans multiple countries, involving suppliers of raw materials, production facilities, and distribution networks. We are committed to ensuring that modern slavery

and human trafficking do not take place within our operations or supply chains. This statement reflects our dedication to ethical business practices and compliance with the Modern Slavery Act 2015.

## 2. Policies in Relation to Slavery and Human Trafficking

APS Group has implemented an Anti-Slavery and Human Trafficking Policy, which is embedded within our broader corporate responsibility framework. This policy sets out our commitment to preventing modern slavery, ensuring fair working conditions, and promoting transparency. We maintain a zero-tolerance approach towards slavery and human trafficking and expect the same from our suppliers and business partners.

## 3. Due Diligence Processes

To mitigate risks associated with modern slavery, we conduct thorough due diligence in our supply chain. This includes:

- Vetting suppliers before onboarding.
- Requiring suppliers to sign the APS Code of Conduct which includes modern slavery
- Engaging with third-party auditors where needed for independent compliance checks.
- Maintaining a whistleblowing mechanism for employees and suppliers to report concerns.

## 4. Risk Assessment and Management

APS Group undertakes regular risk assessments to identify and address potential vulnerabilities in our operations and supply chains. We prioritise industries and regions with a higher risk of forced labour and take corrective action where necessary. Supplier contracts include modern slavery compliance clauses, and non-compliance can result in termination of agreements.

## 5. Key Performance Indicators to Measure Effectiveness

To assess our progress in combating modern slavery, we track the following Key Performance Indicators (KPIs):

- Number of supplier audits conducted annually.
- Number of suppliers that have signed our ethical sourcing policy.
- Number of reported incidents related to modern slavery and actions taken.
- Employee training completion rates on modern slavery awareness.

## 6. Training on Modern Slavery and Trafficking

APS Group provides mandatory training for employees, particularly those involved in procurement, supply chain management, and HR. This training ensures that staff receive clear communications that they must adhere to the standards outlined in the Anti-Bribery

and Corruption policy, which incorporates Modern Slavery and whistleblowing and that they can identify signs of modern slavery, understand reporting mechanisms, and uphold our ethical standards. Additionally, we work with our suppliers to raise awareness and improve compliance throughout our network through regular meetings and/or audits.

## 7. Whistleblowing policy

APSGroup has in place systems to encourage the reporting of concerns or breaches of policy via the Whistleblowing process and will ensure the protection of any whistle-blower.

## 8. Key principles, commitments and initiatives

Furthermore, APS Group enforce the following principles across its staff and supply chains:

**Discipline:** APS Group prohibits 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 documented and accessible to all employees in our Employee Handbook and Business Portal. All disciplinary measures of a serious nature are recorded and actioned.

**Freedom of Association and Employee Representation:** APS Group recognises that all its employees have the right to form and join organisations of their own choosing as long as this does not cause any conflict of interest. APS respects employees' rights to belong to trade unions and fully complies with our legal obligations to inform and consult employees.

**Working Hours:** APS Group will ensure that working hours are reasonable and comply with the law and industry standards.

**Equality of Treatment:** APS Group is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, or social origin and to promoting equality of opportunity and treatment.

**Employment terms:** APS Group will provide written and clear contracts which detail the terms and conditions of its employees' employment.

**Remuneration:** APS Group will, at a minimum, provide wages and benefits that meet legal and national standards. We will provide employees with clear written information on their pay and conditions. APS Group is committed to equal pay and benefits for men and women for work of equal value.

We all have a responsibility to be aware of the risks, however small, in both APS Group and the wider supply chain. We encourage our employees to report any concerns to the Executive Team or Head of HR, however small, and these concerns will be acted upon.

As part of our initiatives to identify and mitigate the risk of Modern Slavery APS Group will (but not limited to):

- Identify and assess potential risk areas when engaging new suppliers and completing stringent vetting and investigation of our supply chain; this includes carrying out the appropriate background and financial checks, quality checks and site visits in addition to receiving a signed Code of Conduct and Non-Disclosure Agreement (NDA) from the supplier.

- Perform enhanced on-going due diligence when reassessing existing suppliers, including the downward supply chain; to include both quarterly and annual business reviews with key suppliers.
- Where possible, build long-standing relationships with local and international suppliers and be clear about our expectations regarding ethical business behaviour, which is outlined in our Code of Conduct Agreement.
- Invoke sanctions against suppliers that fail to meet the expectations as an ethical business partner, all of which are contained in the Code of Conduct agreement. Failure to adhere to the above or to improve performance in line with an action plan could result in the termination of the business relationship.
- Continue to review and monitor our own internal payroll systems to ensure all employees are paid above the minimum wage and have the right to work.
- Actively encourage the reporting of concerns to the business through the Whistleblowing procedure and provide appropriate protection of whistle blowers.

## Commitment and Review

APSGroup is committed to continuing to monitor the effectiveness of the programme, implementing enhancements when required, and ensuring that policies and procedures in relation to Modern Slavery are implemented.

The Executive Directors, along with the support from APS Group's Procurement, Human Resources and Compliance functions, have reviewed and approved this statement as being suitable and relevant to the activities of APS Group. They also commit to review the statement on an annual basis to ensure its continued suitability.

*N Snelson*

N Snelson (Apr 3, 2025 10:30 GMT+1)

**Signed for on behalf of APSGroup Limited**

**Nick Snelson**

**Managing Director**

**Date:** 03/04/25