London, 12 May 2025

Modern Slavery Act Statement for Fiscal Year 2024

Modern Slavery is a crime resulting in an abhorrent abuse of human rights. Forced or compulsory labour, human trafficking, withholding of documentation, workplace abuse and other kinds of slavery and servitude represent some of the gravest offenses of fundamental human rights in any society.

Upstream Mobile Commerce Limited (together with its subsidiaries, "Upstream" or the "Company") has taken steps to ensure that no kind of slavery and human trafficking is taking place in our supply chains or in any part of our business.

Overview

Upstream is a leading mobile technology company specializing in providing mobile marketing solutions in the new digital environment in emerging markets across the world, addressing indirectly 1.2 billion people. Our services support the adoption of digital services by our business-partners with multiplying effects for local economies.

Upstream recognizes the importance of combating modern slavery, an exploitative crime that affects communities and individuals across the world – a global issue that transcends age, gender and ethnicities. We in Upstream endorse a purposeful mission to improve the lives of others, as well as a passionate commitment to opportunity for all. Accordingly, we are wholly opposed to such abuses of a person's freedoms in our operations and our supply chains.

As a professional services provider, the Company does not operate in an industry where modern slavery is prevalent and does not operate a supply chain but, nevertheless, we are committed to taking steps to monitor any potential risks within its operations. We are actively engaged in continually strengthening and enhancing our approach to tackling modern slavery.

Our policy

The Company respects fundamental human rights and is committed to the principles, as affirmed by the United Nations Universal Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence; in particular, the effective elimination of compulsory labour and child labour.

Fair, equal treatment and collaboration, transparency, trust, a fair and inclusive workplace and business environment that protects the dignity and well-being of its employees; these are the pillars of our culture and our values.

We have a long-standing commitment to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern

slavery is not taking place anywhere in our own businesses or those of our suppliers. We have established a zero tolerance position in our approach to any kind of labour exploitation and we demand the same attitude of all who work for us and expect it of all with whom we have business dealings. We review our policies and procedures on an ongoing basis to ensure they remain effective and identify opportunities to further enhance and strengthen our approach.

Our structure

Upstream is a private limited company, incorporated in England and Wales. It is the holding entity for a network of mobile technology and digital services companies based around the world, where each company is a separate legal entity.

Our business and supply chains: assessment and management of risk

- **Procurement**

We are not a mass-market manufacturer and do not directly own or operate large factories or other production facilities and, in this regard, we do not operate a supply chain for our products. Our external suppliers across the world are companies in low-risk sectors (such as professional services).

Most of our external expenditure is associated with suppliers that provide us with digital services, network infrastructure, IT and related services and data centers that run our networks. The remaining expenditure is made up of a wide variety of goods and services procured to support our general business and administrative functions, including marketing, travel, professional advisory support. Additionally, we are not being supplied by any goods that have been identified to be at higher risk of being produced by child or forced labour.

Nevertheless, we require equivalent standards to those set out in this document from any prospective supplier and we choose business partners with great care, ensuring that they are the most competent, ethical and reliable.

We are currently in the process of developing a 'Procurement policy' which will set out these requirements by detailing the basic principles of how we conduct business in an open, honest and transparent manner, the behaviours and practices we expect of our suppliers and partners, including a commitment to comply with anti-slavery laws.

We further aim to include a relevant clause in our standard terms and conditions to ensure that all suppliers comply with our anti labour exploitation policy and that Upstream reserves the right to terminate a relationship with a supplier or third party that is unable to demonstrate compliance or progress towards the eradication of modern slavery within its organization and supply chain.

- **Due diligence**

We do not operate a supply chain for our business operations, we expect however, as a minimum, both ourselves and our occasional suppliers to comply with all applicable local laws and regulations providing

safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

In addition to existing supplier assessment processes, Upstream is deploying a questionnaire to focus on modern slavery activities/indicators on a risk basis, according to the nature of the services provided. The subjects covered are human trafficking and slavery, health and safety, the environment, data protection, information security and bribery. Suppliers are requested to report on what steps they are taking regarding identifying the risk of modern slavery within their own operations which will allow the Company to better assess potential risks of modern slavery in its operations. This process of screening and the series of due diligence questions is applied both to new and to renewing suppliers.

Suppliers' compliance to our principles is monitored on a continuous basis.

- **Human resourcing policy**

Upstream's global human resourcing policy sets out the overarching principles and controls to be followed and applied in each of our locally operating companies, in order to ensure that personnel resourcing is conducted in a fair and transparent manner. Our Human Resources department is committed to taking appropriate steps to ensure that everyone who works for Upstream – in any capacity, anywhere in the world – is protected from unfair treatment and benefits from a fair and inclusive working environment in which their fundamental rights and freedoms are respected. Upstream is conducting robust recruitment processes in line with relevant employment laws and market-related renumeration schemes. Moreover, we in Upstream are devoted to the wellbeing of our employees, having implemented strategies to support our people's physical and mental wellbeing.

- **Training and communication**

In order to address the risks and to help increase education and awareness on the subject of modern slavery and our policies, we have communicated the standards covering the above principles (as a minimum) in our organization and have ensured that our staff know them and know how to apply them. In 2024, we ran training about our risk assessment and due diligence processes to the relevant Procurement department – making them aware of the role they play in ensuring we work with suppliers who uphold the same ethical principles as us.

Moreover, to make all employees across departments aware of possible indicators of modern slavery, we share this statement with all employees through our internal communication channels and a copy of this statement is made available on Upstream's website (www.upstreamsystems.com).

We further encourage employees to identify and report any concerns they have in relation to potential breaches of these principles.

Next steps and approval

Going forward, we are continuing to refine our due diligence and risk assessment process. Any instances of non-compliance will be assessed on a case-by-case basis and any remedial action will be taken appropriately.

This statement is published pursuant to the UK Modern Slavery Act 2015 (the Act) and related to the fiscal year ended 31 December 2024. In accordance with Section 54, Part 6 of the Act (Transparency in Supply Chains), it sets out the steps that Upstream has taken to address the risks of modern slavery and human trafficking in any part of our business, operations or supply chains.

The Board of Directors of the Company has approved this Statement on 12 May 2025; and delegated authority to the Chief Executive Officer of Upstream Group of Companies to sign it on their behalf.

Dimitris Maniatis

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Chief Executive Officer

of Upstream Group of Companies