

HUMAN RIGHTS AND MODERN SLAVERY STATEMENT

VERSION CONTROL

Name	Date	Reason for Change	Version Number
HR	May 2017	Review	V1
HR	May 2018	New Format	V2
HR	Oct 2018	Review	V3
HR	Dec 2018	Review	V4
HR	Mar 2020	Review	V5
HR	Jan 2021	Review	V6
HR	Apr 2022	Review	V7
HR	Apr 2023	Review	V8
HR	Apr 2024	Review	V9
HR	Apr 2025	Review	V10
Marc Sneddon	July 2026	Review	V11

FOREWORD

APS Group is an international marketing services business delivering integrated communications, content and multichannel customer experience programmes to local and global brands. Our services combine creative expertise, enabling technology, robust infrastructure and a highly skilled workforce operating across complex international supply chains.

We recognise that modern slavery persists globally in many forms including forced labour, bonded labour, human trafficking and labour exploitation. As a business operating through multi-tier supply chains we acknowledge our responsibility to take a proactive, risk-based and proportionate approach to preventing modern slavery within our operations and supply chains to supporting effective remediation where issues are identified.

INTERNATIONAL STANDARDS

This Modern Slavery Statement is made pursuant to section 54(5) of the UK Modern Slavery Act 2015. It aligns with our internal policies and our commitments under the UN Global Compact (UNGC), including the Ten Principles on human rights, labour, environment, and anti-corruption. Our approach also reflects the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and our priority UN Sustainable Development Goals, including SDG 8 (Decent Work and Economic Growth) and SDG 10 (Reduced Inequalities).

OUR PRINCIPLES

APS Group seeks to::

- avoid causing or contributing to adverse human rights impacts through its own activities and to address such impacts where they occur;
- prevent or mitigate adverse human rights impacts that are directly linked to its operations, products, or services through business relationships; and
- support appropriate remediation through legitimate processes where adverse impacts are identified.

We maintain a zero-tolerance stance toward modern slavery, applied in a mature and evidence-based way. We recognise that modern slavery is widespread and often hidden within global supply chains. Identifying indicators of exploitation is not a failure; failing to identify or look for them is. Our focus is therefore on responsible remediation. We commit to:

- engaging specialist external support, including the Slave-Free Alliance;
- prioritising the safety, protection and remediation of affected individuals;
- working with suppliers to address root causes where feasible;
- suspending or terminating relationships where a supplier refuses to remediate or is knowingly exploitative; and
- embedding internal learning to prevent recurrence.

ORGANISATION & SUPPLY CHAIN STRUCTURE

APS Group operates primarily in the United Kingdom, Europe and North America, with supply chains extending into Asia-Pacific and other global regions to support client programmes, particularly for print, manufactured goods and logistics services.

APS does not directly manufacture all of the goods supplied to clients. Physical production, manufacturing, distribution and fulfilment activities are also delivered by specialist third-party suppliers appointed and managed by APS on behalf of its clients. APS retains oversight of supplier selection, standards, performance and compliance with its ethical, human rights and modern slavery expectations through contractual requirements, supplier due diligence and ongoing supplier engagement rather than direct operational control.

RISK ASSESSMENT & MANAGEMENT

APS Group undertakes regular risk-based assessments to identify and manage potential modern slavery risks across its operations and supply chains. Risk assessment considers factors including product or service/ product type, geography, supply-chain tier, supplier maturity, workforce vulnerability and the potential impact of purchasing practices. APS recognises that the highest potential modern slavery risks are more likely to arise within certain parts of its third-party supply chain, including manufacturing, logistics and subcontracted labour. These areas are prioritised based on severity and likelihood of risk.

Visibility and leverage are strongest at Tier 1 suppliers (those we engage with directly, rather than the suppliers within our cascaded supply chain). They represent the closest link to our operations, with influence typically decreasing further down the supply chain. As a result, deeper supply chain mapping beyond Tier 1 is undertaken on a risk-prioritised basis, rather than comprehensively across all categories and geographies.

We also segment our suppliers based on criticality, considering factors such as data handling, contract value, supply bottlenecks, and strategic importance. This segmentation informs both our expectations of suppliers and the level of due diligence, monitoring, and audit applied across the supply chain.

DUE DILIGENCE PROCESSES

APS applies proportionate and risk-based due diligence to its supply chains. This includes supplier vetting prior to onboarding, mandatory acceptance of the APS Supplier Code of Conduct and ongoing supplier engagement informed by risk profile.

Enhanced due diligence measures, including audits, site visits, or independent assurance, may be applied in higher-risk categories or geographies. APS prioritises engagement and corrective action to address identified risks, while recognising and seeking to avoid unintended consequences for vulnerable workers.

In the past 12 months, APS has strengthened its due diligence processes relating to slavery and human trafficking in several practical ways:

- Expanded structured supplier surveys to capture human rights, labour standards, and diversity data alongside environmental disclosures.
- Increased encouragement and uptake of third-party assurance platforms such as Sedex and EcoVadis to provide independent validation of supplier practices.
- Provided subject-matter expert (SME) support to smaller suppliers to assist in the development or enhancement of policies relating to human rights, responsible sourcing, and governance.
- Reviewed supplier maturity prior to introducing new compliance expectations, ensuring requirements are proportionate and focused on genuine risk mitigation.

These measures reflect a shift from reliance on policy acknowledgement alone toward deeper engagement and capability building across our supply base.

POLICIES IN RELATION TO SLAVERY & HUMAN TRAFFICKING

APS Group maintains an Anti-Slavery and Human Trafficking Policy embedded within its wider corporate responsibility framework. This is supported by the APS Supplier Code of Conduct, Sustainable Procurement Policy, Whistleblowing Policy and Anti-Bribery and Corruption Policy. These policies set out clear expectations regarding ethical conduct, labour standards, and modern slavery prevention and are communicated to employees and suppliers. Policies are reviewed periodically to ensure alignment with evolving legislation, recognised international standards, and APS Group's risk profile.

TRAINING & AWARENESS

APS Group delivers mandatory training to all employees, tailored to their role and level of responsibility, to ensure a clear understanding of modern slavery risks, indicators and reporting expectations. This is supported by more detailed training for employees in higher-risk or key functions, including procurement, supply chain management and human resources, to strengthen awareness and effective identification and escalation of concerns. Training content is informed by external guidance and is reviewed periodically to strengthen practical understanding, identification, and escalation of modern slavery risks. APS also engages with suppliers to reinforce expectations through onboarding, communication, and ongoing engagement.

In the last 12 months, 100% of procurement staff completed introductory or refresher sustainability training, including modules covering responsible sourcing, human rights considerations, and risk indicators relevant to modern slavery. Sustainability training is now embedded into buyer onboarding, ensuring that responsible procurement principles are integrated from the outset of employment.

All procurement employees have access to external learning platforms, including the EcoVadis Academy and the UN Global Compact Academy, supporting ongoing development aligned with international labour and human rights standards. Refresher workshops have been piloted to ensure teams remain informed of regulatory developments and evolving client expectations.

We recognise that tackling modern slavery also requires supplier capability. Alongside employee training, we engage suppliers through structured communication, guidance, and capability-building activities to support understanding of APS expectations and strengthen labour rights across the value chain.

Supplier-facing engagement includes providing:

- guidance on indicators of forced labour and ethical recruitment;
- clear explanations of APS due diligence processes, documentation requirements, and remediation expectations;

WHISTLEBLOWING & GRIEVANCE MECHANISMS

APS Group has systems in place to encourage the reporting of concerns or breaches of policy via its Whistleblowing process and ensures appropriate protection for whistle blowers. Employees and relevant third parties are encouraged to raise concerns, however small, and such concerns are investigated and acted upon through established internal processes.

INCIDENTS OF MODERN SLAVERY

During the reporting period, APS Group did not identify any confirmed incidents of modern slavery within its own operations or supply chains. This does not indicate an absence of risk. APS continues to strengthen its detection, reporting, and escalation mechanisms to improve visibility and early identification of potential issues.

Where remediation has been required in relation to labour standards or supplier non-compliance, actions have included corrective action plans, enhanced engagement, and improved supplier practices. Learning from these outcomes has informed subsequent risk prioritisation and supplier engagement.

CONTINUOUS IMPROVEMENT

APS Group recognises that managing modern slavery risk is an ongoing process. Beyond legal compliance, APS is committed to continuous improvement in how it identifies, assesses, and mitigates risks across its operations and supply chains.

This includes strengthening risk assessment processes, enhancing supplier engagement in higher risk categories, refining due diligence approaches and reviewing governance and training arrangements to ensure continued effectiveness and relevance.

APPROVAL & REVIEW

This statement has been reviewed and approved by the Executive Directors, with support from APS Group's Supply Chain and Procurement, Human Resources, Sustainability, Legal, and Compliance functions. It is signed by the Managing Director on behalf of APS Group Limited and will be reviewed annually to ensure its continued suitability.

A handwritten signature in black ink, appearing to be 'Nick Snelson', with a stylized, looped initial 'N' and a horizontal line extending to the right.

Signed for on behalf of APS Group Limited

Nick Snelson

Managing Director

Date: 17/07/26



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if you require further information

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