



Anti Slavery & Human Trafficking Policy

Policy Statement

ZOO Digital Group plc is committed to conducting its business in compliance with legislation in order to combat slavery and human trafficking. We are committed to further improving and developing our practices over the coming years.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Our Supply Chains

We have a zero-tolerance approach to modern slavery, and we are committed 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 business or in any of our supply chains.

We predominately employ professionally qualified and highly skilled people. We consider that given the nature of our business and the industries in which we operate, the risk of encountering modern slavery practices is relatively low. Our supply chains are limited to standard daily business supplies and engagements with sub-contractors who provide specialist linguistic and technical contributions for our projects, such as translators and voice actors. These supply chains typically engage individual freelance workers and do not involve multiple corporate suppliers and therefore we have good visibility of the entire supply chain.

Commitment

ZOO Digital Group plc is committed with dedication to:

1. Condemn illegal child labour, forced labour and discrimination. ZOO Digital Group plc does not engage with any supplier or business that engages in such discriminatory practices and in turn should such situations be identified; ZOO Digital Group plc is committed to informing the relevant third parties to prevent such activity continuing.
2. Provide quality employment conditions and compensate our employees appropriately.
3. Provide a safe and healthy working environment for our employees.
4. Respect employees' human rights and personal rights.
5. Take interest and provide support for our employees with regards to their health and wellbeing.
6. Encourage a sense of social responsibility amongst managers and employees alike.
7. Comply with all applicable UK and international laws and regulations relevant to our activities.

Modern Slavery



The Modern Slavery Act came into effect on 29th October 2015. Our policy reflects our commitment to acting ethically with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place in our business or any of our supply chains. We choose suppliers and contractors who we believe share our commitment.

Responsibility for the Policy

Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Managers have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

This policy was approved by the Board of Directors of ZOO Digital Group plc at a meeting held on 19 August 2024.

Signed by:

Stuart Green
CEO
19 August 2024