

# **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**



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## **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

This policy applies to all Stakeholders including all persons working for or on behalf of the Reply Group 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 the Reply Group may amend it at any time.

The Policy should be read in conjunction with Reply's Code of Ethics and Whistleblowing Policy.

### **2 ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

Modern slavery is a crime and a violation of fundamental human rights taking 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. Any reference in this policy to 'modern slavery' should be understood as a reference to modern slavery, human trafficking or any other activity that is rendered unlawful by the Modern Slavery Act 2015.

The Reply Group is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or supply chains.

The Reply Group is also committed to ensuring there is transparency in its business, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The Reply Group expects the same high standards from all of its contractors, suppliers and other business partners. It will endeavour to ensure that provisions are included in agreements with all contractors, suppliers and other business partners requiring them to comply with the principles set out in this policy.



### **3 RESPONSIBILITY FOR THE POLICY**

The board of directors of Reply Limited has overall responsibility for ensuring this policy complies with its legal and ethical obligations, and that all those under its control comply with it.

Riccardo Lodigiani has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and checking internal 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 (including the reporting obligations set out in section 4) and, where necessary, receive adequate training on it.

### **4 COMPLIANCE WITH THE POLICY**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for the Reply Group or under its control.

All Stakeholders are required to avoid any activity that might lead to a breach of this policy and must notify their manager or relevant contact in the Reply Group as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Stakeholders are expected and encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Reply business or supply chains of any supplier tier at the earliest possible stage (including if they are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery).

The Reply Group encourages openness and will support anyone who raises genuine concerns in good faith under this policy and are committed to ensuring no one suffers any detrimental treatment (including dismissal, disciplinary action, threats or other unfavourable treatment) as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place.



## **5 COMMUNICATIONS**

This policy is published on the Reply's site Tamtamy; all the employees of the Reply Ltd Group must read and accept the policy on Tamtamy.

If considered necessary by the board of Reply Limited, training on this policy may form part of the induction process for all individuals who work for Reply.

The Reply Group's zero tolerance approach to modern slavery in its business and supply chains should be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter and a clear record kept of that communication. Those responsible for entering into business arrangements, contracts and agreements with suppliers, contractors and business partners should use all reasonable endeavours to ensure that appropriate provisions are included in contractual documentation.

## **6 BREACHES OF THIS POLICY**

Any employee who breaches this policy may face disciplinary action, which in serious cases could result in dismissal for misconduct or gross misconduct.

The Reply Group may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy or fail to comply with their modern slavery obligations under any contractual arrangements with the Reply Group.