

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024
(pursuant to section 54(1) of the Modern Slavery Act 2015)

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Reply's Modern Slavery and Human Trafficking Statement for the financial year 2024.

1. Organisation structure and supply chains

Reply is a group that specialises in technology consulting, system integration and digital services with a focus on the conception, design and development of solutions based on the new communication channels and digital media. Composed of a network of companies, Reply partners with key sectors to define business models. This is made possible by the new technological and communication fields such as artificial intelligence, big data, cloud computing, digital communication and the Internet of Things. With more than 15,000 employees worldwide (as of 31 December 2024), Reply operates via a network of companies that specialise in processes, applications and technologies, each a centre of excellence in their respective fields of expertise.

Reply Limited and its UK Affiliates are part of a global network of Reply Companies in the Reply Group. From time to time, we subcontract elements of our client engagements or operations to other Group Companies, for example, when providing services in compliance with our business model. Our Group Companies are therefore part of our supply chain. In our risk assessment and due diligence activities, we distinguish between members of the Reply Group in our supply chain and third-party suppliers. All the Reply Companies are founded on and practice the same values and ethics and share the same commitment to the highest standards of ethical conduct and integrity in their business activities in the UK and overseas.

Reply takes a zero-tolerance approach to slavery and human trafficking by its own organisation, its employees, agents or consultants or any person or body acting on its behalf; it also repudiates child and forced labour. Reply is committed to implementing effective measures to ensure that slavery and human trafficking are not taking place: (i) in any of its supply chains; and (ii) in any part of its own business.

2. Policies in relation to slavery and human trafficking

In pursuit of the goal of keeping the highest ethical standards and avoiding any form of slavery and human trafficking activities, Reply Group has adopted the following appropriate policies, which we continuously review and update:

- 1) A [Code of Ethics](#) to ensure that Reply Group's key ethical values are clearly defined and constitute the basic element of corporate culture, as well as to set a standard of conduct for all those working for Reply Group with regard to business and non-business affairs. The Code of Ethics is intended for all the Group's stakeholders: shareholders, employees, independent contractors, suppliers, customers, and business partners.

It should be noted that in all contracts entered into by Group companies, independent contractors and suppliers are required to accept and apply the Group's Code of Ethics and, the Supplier Code of Conduct. The social nature criteria used to assess suppliers are specific to the various countries. In particular, for the United Kingdom, the Modern Slavery Policy has also been issued for suppliers.

By requesting our suppliers to comply with our Code of Ethics, we are committed to upholding the human rights of workers in our supply chain and treating them with dignity and respect, ensuring safe working conditions, and conducting responsible, ethical operations. For this reason, the selection of

suppliers and stipulation of terms and conditions applicable to the purchase of goods and services for Group companies are dictated by the values and criteria of legality, competition, objectivity, integrity, impartiality, fair price, quality of goods and/or services, with a careful evaluation of product warranty and range of offers.

- 2) A [Modern Slavery and Human Trafficking Policy](#) which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain. 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. The Policy should be read in conjunction with Reply's Code of Ethics and Whistleblowing Policy.
- 3) A [Human Rights & Labour Policy](#) to confirm, together with the Code of Ethics, Reply Group's commitment to the protection of human rights, favouring diversity, inclusion, avoiding any form of discrimination based on ethnicity, gender, sexual orientation, physical and health conditions, disability, age, nationality, religion or personal opinions, guaranteeing the physical and mental well-being of employees and their professional growth. We expect the same from our suppliers and strive to enable and influence their management to develop, maintain and follow their own ethical HR policies. The Human Rights & Labour Policy affirms respect for the Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights promulgated by the United Nations, and the conventions issued by the International Labour Organisation.
- 4) A [Whistleblowing Policy](#) which provides, in compliance with the applicable laws, a framework to promote responsible and secure whistleblowing; in particular, it is aimed at:
 - encouraging stakeholders to report as soon as possible malpractice or wrongdoing with reference to laws and Reply Group Policies, in order to allow the relevant functions to carry out the necessary investigations;
 - reassuring stakeholders that they are able to raise genuine concerns without any reprisal affecting their work or relationship with Reply.

3. Key performance indicators

To support ethical practices, Reply Group relies on its Supplier Code of Conduct, which includes provisions on labour rights, and conducts annual self-assessment campaigns to identify any non-compliance. Moreover, Reply has established a Whistleblowing Policy and reporting channel to allow stakeholders, including workers across the value chain, to report inappropriate labour practices confidentially. These mechanisms indirectly contribute to monitoring and mitigating modern slavery risks.

Nevertheless, no incidents of human rights violations have been reported in the upstream segment of the value chain in 2024 or in previous years.

4. Due Diligence, risk assessment and training

The validity of Reply's Corporate Social Responsibility management model is recognised by rating agencies and by ESG indices, which guarantee transparency in communication to investors and comparability with peers, as

well as increasing the Group's visibility on the financial market (for more information, see [GOV-4] *Statement on due diligence* - page 99 https://www.reply.com/contents/REP25_Bilancio_ENG_2024.pdf).

The ESG self-assessment activity can be seen as a social monitoring element. Since 2012, Reply has been participating in the CDP (formerly the Carbon Disclosure Project), one of the most important international non-profit organisations for reporting on climate change, and in 2024, it obtained level B, maintaining the same level as 2023, testifying to its commitment to climate change.

Reply has been confirmed as "low risk" in the Sustainalytics index, the leading rating agency for the assessment of companies in the ESG area.

Actions taken and results achieved by our Company and Reply Group have been reported on the Reply Group's Consolidated Sustainability Statement, integrated into the [Group's 2024 Consolidated Annual Report](#), and are available on our corporate website.

Within the induction process, all new employees receive training on the principles of the Modern Slavery Act 2015 and are requested to accept Reply's Modern Slavery and Human Trafficking Policy.

Our Company will continue to assess and manage risks of unethical behaviour in all respects, including but not limited to the Modern Slavery Act 2015, and will continue to develop our approach to truly global ethical employment standards for our employees and our suppliers.

Signed by

Jason Hill, Chief Executive Officer UK