

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025 (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 2025.

1. Organisation structure and supply chains

Reply is a group specialising in technology consulting, system integration, and digital services, with a focus on the conception, design, and development of solutions based on new communication channels and digital media. Operating as a network of companies, Reply partners with key sectors to define business models enabled by technologies such as artificial intelligence, big data, cloud computing, digital communication, and the Internet of Things. As of 31 December 2025, Reply employs more than 15,000 people worldwide, with each company specialising in processes, applications, and technologies as a centre of excellence in their respective fields.

Reply Limited and its UK affiliates form part of the global Reply Group. From time to time, elements of client engagements or operations are subcontracted to other Group companies in line with our business model. These Group companies therefore form part of our supply chain. Within our risk assessment and due diligence processes, we distinguish between Reply Group companies and third-party suppliers. All Reply companies operate under shared values and ethical standards, with a consistent commitment to integrity in business activities in the UK and internationally.

Reply maintains a zero-tolerance approach to slavery and human trafficking across its organisation, including employees, agents, consultants, and any parties acting on its behalf. The company also rejects child and forced labour. Reply is committed to implementing effective measures to ensure that slavery and human trafficking do not occur within its supply chains or any part of its 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, and which remain appropriate for addressing modern slavery risks in our operations and supply chain:

- 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, in line with our Code of Ethics, Modern Slavery and Human Trafficking Policy and Anti-Bribery and Corruption Policy.

- 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.
- 4) A [Whistleblowing Policy](#) which provides, in compliance with the applicable laws, a framework to promote responsible and secure whistleblowing.
- 5) An [Anti-Bribery and Corruption Policy](#) which sets out Reply Group's zero-tolerance approach to bribery and corruption and establishes standards for ethical conduct across all business activities. The Policy applies to all persons working for or on behalf of the Group and reinforces our broader commitment to preventing modern slavery and human trafficking by promoting transparency, accountability and responsible business practices throughout our operations and supply chain.

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 2025 or in previous years. Given the nature of our operations as a consulting and digital services organisation, our exposure to modern slavery risk is considered to be relatively low. However, risks may arise through third-party suppliers and subcontractors. These mechanisms support our ongoing assessment of the effectiveness of our controls in mitigating modern slavery risk

4. Due Diligence, risk assessment and training

Reply has implemented a structured approach to identifying, assessing and mitigating risks of modern slavery within its operations and supply chain. This includes proportionate due diligence processes applied to third-party suppliers and ongoing monitoring of risk exposure.

As part of our supplier onboarding and procurement processes, suppliers are expected to comply with our Code of Ethics and applicable policies, including our Modern Slavery and Human Trafficking Policy and Anti-Bribery and Corruption Policy. Where appropriate, suppliers may be subject to risk-based assessment and review, taking into account factors such as the nature of the services provided, geographic location and level of engagement.

We recognise that modern slavery risks may arise within complex supply chains and therefore seek to continuously improve visibility and oversight of our suppliers. This includes maintaining contractual controls, promoting transparency and engaging with suppliers where necessary to ensure alignment with our ethical standards.

Where concerns are identified, appropriate steps are taken to assess and address potential risks, including escalation through internal governance processes and, where required, engagement with suppliers to implement corrective actions.

Training on the principles of the Modern Slavery Act 2015 continues to be provided as part of the induction process for all new employees. Employees are required to adhere to our policies and to report any concerns through established reporting channels, including our Whistleblowing Policy.

Our Company will continue to assess and manage risks of unethical behaviour in all respects, including modern slavery and human trafficking, and will continue to strengthen its approach to ethical standards across its operations and supply chain.

Signed by

Jason Hill
Director
On behalf of the Board of Reply Ltd