

**SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023**  
**(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 Limited's Modern Slavery and Human Trafficking Statement for the financial year commencing 1 January 2023 and ending 31 December 2023. It was approved by Reply Limited's Board of Directors on 30 June 2023.

**1. Organisation structure and supply chains**

Reply Limited ("the Company"), a member of Reply Group, is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. The Company 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.

Reply Group repudiates child and forced labour. Our Company 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.

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 from 2022, 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. From 2021, other types of contracts are also managed (so-called Zero Hour Contracts): this type of collaboration involves the direct payment of contributions by the customer.

**2. Policies in relation to slavery and human trafficking**

In pursuit of the goal of keeping the highest ethical standards and avoid 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.

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 Organization.

(4) A Whistleblowing Policy which ensures the effectiveness of the above Policies' provisions and avoids any episode of discrimination. Our whistleblowing system is specifically aimed to report irregularities or violations of applicable regulations or internal procedures, guaranteeing the anonymity of reports.

### **3. Key performance indicators**

In 2021, Reply joined the United Nations Global Compact committing to support the Ten Principles on Human Rights, Labour, Environment and Anti-Corruption promoted by the initiative, and to contribute to the achievement of the Sustainable Development Goals:

#### **1 – Human rights**

- Support and respect the protection of internationally proclaimed rights within the realm of our influence;
- Ensure that we are not complicit, not even indirectly, in human rights abuses.

#### **2 – Labor**

- Uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Eliminate all forms of forced and compulsory labor;
- Effective abolition of child labor;
- Elimination of discrimination in respect of employment and occupation.

#### **3 – Environment**

- Support a precautionary approach to environment challenges;
- Undertake initiatives to promote greater environmental responsibility;
- Encourage the development and diffusion of environmentally friendly technologies.

#### **4 – Anti-corruption**

- Work against corruption in all its forms, including extortion and bribery.

#### 4. Due Diligence, risk assessment and training

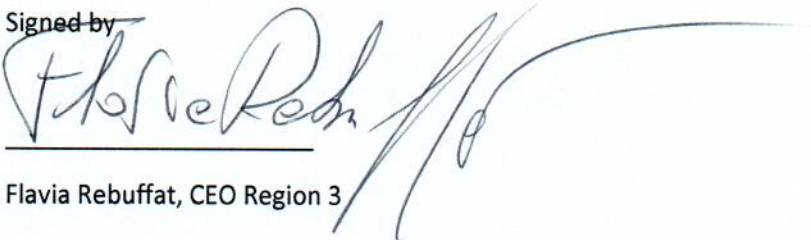
The ESG self-assessment activity can be seen as a social monitoring element. The validity of Reply's Corporate Social Responsibility management model is recognised by rating agencies and by ESG indices, which guarantee transparency in communication to investors and comparability with peers, as well as increasing the Group's visibility on the financial market. 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 2022 it obtained level B, an improvement compared to level B- in 2021, testifying to its commitment to climate change. Reply has been confirmed as "low risk" in the Sustainalytics index, the leading rating agency in the assessment of companies in the ESG area. In May 2022, Reply was rated A by MSCI, a leading international company in the provision of information tools to support the investment decisions of global investors. In 2022, Reply won the silver medal in the Ecovadis assessment, confirming its performance with a score of 62/100, an improvement on the previous year.

Actions taken and results achieved by our Company and Reply Group thanks to the integration of the above Ten Principles in its strategies and business operations have been reported on the Reply Group's [Consolidated Disclosure of non-financial information 2022](#) 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

A handwritten signature in black ink, appearing to read 'Flavia Rebuffat', is written over a horizontal line. A long, sweeping horizontal line extends from the end of the signature across the page.

Flavia Rebuffat, CEO Region 3