

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

2025

Purpose

The purpose of the Anti-slavery and Human Trafficking Policy (the 'Policy') is to set out Service Graphic's approach to avoiding, detecting and preventing activity associated with the Company which falls under the Modern Slavery Act 2015. It aims to protect the reputation of the Company, protect employees and agents of the Company from unfair and improper treatment and accusations of impropriety and ensure that all customers and suppliers are dealt with on an equal basis.

Scope

The Policy applies to all employees of Service Graphics Ltd (or any subsidiary thereof), hereinafter referred to as "the Company".

The Policy is subject to review and amendment by the Company at any time. Any changes will be notified to all employees.

The Policy also applies to **third parties, which means** any individual or organisation whom employees come into contact with during the course of their work for the Company and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Where there are any express terms and conditions of employment in place they will take precedence, providing they meet the minimum standards of any statutory requirements. Where those statutory requirements are not achieved the Policy will take precedence

Policy Statement

The Company has a zero-tolerance approach to modern slavery and supports the objectives of the Modern Slavery Act 2015 in raising awareness of modern slavery and human trafficking. The Company is committed to acting ethically and with integrity in all of its business dealings and relationships.

The Company does not tolerate the exploitation of anyone who is employed by it or who works with it towards achieving its business goals. The Company expects its contractors, suppliers and other business partners to uphold high standards in all business practices.

The Company has implemented and enforces effective systems and controls to ensure modern slavery is not taking place in the business and its supply chains.

General Principles

- The Company will audit its higher risk suppliers, as determined by the ILO to check compliance
- The Company will comply with the disclosure obligations under the Modern Slavery Act 2015, which reflects the Company's commitment to ensuring the business is transparent
- Any employee who breaches this Policy will face disciplinary action, which could result in action up to dismissal
- The Company may terminate its relationship with any suppliers or other associates working with Service Graphics or any wider Paragon business if they breach this Policy

Responsibilities

The Company is responsible for:

- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in its own business and supply chains
- Managing the principal areas of risk related to slavery and human trafficking: supply chains, recruitment through agencies and general recruitment
- Lead by example by undertaking appropriate checks on all employees, recruitment agencies, suppliers etc.
- Making a clear annual statement that the Company takes its responsibilities to its employees and people working within its supply chain seriously

The employees of the Company are responsible for:

- Avoiding any activity that might lead to a breach of this Policy and the Modern Slavery Act 2015
- Raising concerns with their manager as soon as possible if they believe or suspect that a conflict with, or breach of, this Policy has occurred, or may occur, in the future in any part of the business or supply chains. This may also be reported by following the Whistleblowing Policy and Procedure

Definitions

Modern slavery

Modern slavery is a complex and multi-faceted crime. There are a number of forms of modern slavery and the Modern Slavery Act 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed using coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This Policy covers all four activities.

Due Diligence

Due diligence process for slavery, servitude, forced or compulsory labour and human trafficking in the Company

The Company has assessed its employment arrangements and Human Resources Policies and has determined that the risk of any of these offences occurring in this area is low.

The Company utilises temporary employees in addition to its permanent employees to support business needs. All employees, whether temporary, consultancy based or permanent are paid in accordance with the same guidelines. Service Graphics and Paragon Group also adhere to the standards of the Living Wage legislation which is reviewed on an annual basis.

The Company's recruitment processes ensure that where it appoints a third party to assist with recruitment; they do not charge recruitment fees to the individual being considered for employment. The Company also undertakes verification of all individuals, as required by UK legislation, prior to appointment and in certain roles, this includes Verify checks and other security checks as required by the Company's clients

Impact on Supply Chains

The Company expects its contractors, suppliers and other business partners to uphold high standards in all business practices and to share the Company's zero-tolerance approach to slavery and human trafficking.

As part of the contracting processes, the Company includes prohibitions against the use of employees sourced from forced, compulsory or trafficked labour, and anyone held in slavery or servitude. The Company expects its suppliers to uphold these high standards. The Company also expect all suppliers to comply with all relevant laws of the country in which they operate

This process has led to the development of an effective system to:

- Monitor any potential risk areas in the Company's Supply Chain
- Identify and assess any potential risks
- Mitigate risk of slavery and human trafficking occurring in our supply chains
- Protect whistle-blowers.

Supplier Adherence to Company Values

•The Company is in regular contact with relevant suppliers to ensure that they share the Company's zero-tolerance approach to slavery and human trafficking.

Additionally, to monitor compliance, higher risk suppliers are audited. Supplier checks are completed annually and are completed by a dedicated compliance team, which consists of involvement from audit and compliance, human resources, procurement, and sales.

The processes used are kept under review to ensure consistency of risk assessment, and ongoing management of existing and new suppliers.

Breaches of the Policy

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal. The Company may terminate its relationship with employees, suppliers and any other associates working with Service Graphics and the wider Paragon Group if they breach this policy.

If an employee has a suspicion regarding a breach of this Policy, in any part of the Company's business or supply chains, they are encouraged to raise this with their line manager at the earliest opportunity.

There may be instances where reporting a suspected modern slavery or trafficking case puts the potential victim at risk, so it is important that in the absence of any immediate danger, due care is taken when raising such issues.

Company Signature

A handwritten signature in black ink, appearing to read 'Mike Holyoake', written in a cursive style.

**Mike Holyoake,
Managing Director**