

FCG Worldwide Limited

POLICY: Modern Slavery

2025

This policy relates to FCG Worldwide Limited (Four) and all its subsidiary companies including Four Agency Worldwide, Four Communications, Four Marketing & Media, Four MSA (health media) and Four Communications Group FZ (MENA).

This policy sets out the policy on combatting forced labour in all Four group companies and in our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

We have adopted this policy as part of our larger commitment to encourage ethical, social and environmental responsibility, which includes being Ecovadis accredited and our Social Value policy.

We oppose the use and exploitation of forced labour and we expect all those who work for us or on our behalf to share our zero-tolerance approach. This policy applies to all those who work for us and those who work on our behalf, including employees, agency workers, casual and freelance staff.

Why combatting forced labour matters

1. Forced labour is a global issue, affecting over 20 million individuals worldwide. Taking steps to address forced labour protects vulnerable workers and helps prevent human rights violations.
2. We do not tolerate forced labour within our business. Eradicating forced labour aligns with our ethical principles and is crucial for protecting our reputation, maintaining investor and consumer confidence, and securing our commercial position.

Our responsibilities

1. The Board of Directors holds ultimate responsibility for ensuring that this policy, along with our annual slavery and human trafficking statement (referenced below), complies with our legal and ethical obligations. This policy has been reviewed and approved by the Board of Directors on 25 July 2025.
2. The ethics officer, Nan Williams, is tasked with the day-to-day implementation of this policy. This includes monitoring its application and effectiveness, addressing any queries related to it, and auditing internal processes to ensure that forced labour is not occurring within our business or supply chains. Additionally, the

ethics officer is responsible for preparing the annual statement and presenting it to the Board for approval.

3. In accordance with the Modern Slavery Act 2015, commercial organisations exceeding a certain size are required to publish a slavery and human trafficking statement each financial year. This statement must disclose the measures taken by the organisation to ensure that slavery and human trafficking are not present in its supply chain or business operations. Our statement is attached as Appendix 2 and is also available on the Legal page of our website. It should be read in conjunction with this policy.

What we are doing

1. We are confident that there is no forced labour directly within our business. However, we regularly review this and assess our supply chain to ensure that there is no use of forced labour within the supply chain.
2. We take the following steps to prevent, evaluate and address risks of forced labour in our supply chain:
 - a) We have established a Supplier Code of Conduct on Forced Labour, which we expect our suppliers to comply with. We may impose contractual obligations requiring compliance. This is attached as Appendix 1.
 - b) We will review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we will take appropriate steps to address it.
 - c) We will consider the conduct of each supplier against the Supplier Code of Conduct on Forced Labour when awarding and/or renewing business with the supplier.
3. We will train personnel working with our supply chain on forced labour and the Supplier Code of Conduct on Forced Labour, with the aim of reducing the risks of forced labour in our supply chain.

Employee responsibilities

1. Managers are responsible for ensuring the implementation and adherence to this policy within their respective areas of responsibility.
2. Our employees are expected to remain vigilant and promptly identify any indicators of forced labour within our business or supply chain.
3. We maintain a zero-tolerance stance towards forced labour within our business. If you suspect a breach of this policy or have any concerns regarding forced labour in any part of our business or supply chain, you should immediately notify your manager or the ethics officer. Alternatively, you may report it in accordance with our Whistleblowing policy.

Monitoring our effectiveness

1. We will conduct regular reviews of this policy to ensure its effective operation. In instances where concerns have been raised through this policy, we will evaluate how these concerns have been addressed and determine if appropriate follow-up actions have been taken.
2. We will ensure that all employees and relevant stakeholders are aware of this policy and their responsibilities under it. This includes providing regular training and updates on modern slavery and human trafficking issues, as well as promoting a culture of vigilance and accountability.

Status of this policy

1. This policy is not incorporated into any contract of employment and does not establish any contractual rights or obligations. It is intended to provide guidance and outline our commitment to combatting modern slavery and human trafficking. We reserve the right to amend this policy at any time to reflect changes in legislation, best practices or our organisational requirements. Any amendments will be communicated to all employees and relevant stakeholders in a timely manner.

Appendix 1

FORCED LABOUR

SUPPLIER CODE OF CONDUCT

FCG Worldwide Limited opposes the use and exploitation of forced labour. We expect all those who work for us or on our behalf to share our zero-tolerance approach.

References in this code to “forced labour” include slavery, servitude and any type of forced or compulsory labour as well as trafficking for the purposes of exploitation.

Accordingly, our expectations of suppliers are as follows:

1. Suppliers must not use forced labour.
2. If requested by us, suppliers will complete a self-assessment questionnaire provided by us regarding the use of forced labour and the steps they have taken to ensure that neither they nor their supply chain make use of it. Suppliers will provide us with a copy of the completed questionnaire.
3. Suppliers will allow us to audit compliance with this Code by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Suppliers are expected to provide prompt access to their facilities, records, documentation and personnel.
4. If we identify any non-compliance, suppliers must prepare, permit us to review and execute an improvement plan approved by us to rectify matters.
5. Suppliers will place similar expectations to those set out above on their own suppliers.

We may require compliance with this Code of Conduct on Forced Labour in our contracts with suppliers and may also require that they impose equivalent obligations on their own suppliers.

Subject to any contractual terms, we may terminate our supply relationship if a supplier fails to comply with this Code of Conduct on Forced Labour. If appropriate, we may report any breach of the Code of Conduct on Forced Labour to the appropriate authorities.

If you have any concerns or are aware of any suspected violations of this code, please notify Nan Williams immediately.

Modern slavery statement for financial year 2024

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that FCG Worldwide Limited and all group companies ('Four') have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Four has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Four is an independent media, creative and communications agency headquartered in London and with offices across the UK and in the Gulf. The agency was launched in 2001 and has grown to more than 250 people and income in excess of £24 million.

Four offers a wide range of services including public relations, marketing, media planning and buying and creative technology. The agency works for a diverse range of private, public and third sector clients and has specialist teams in health, property, tourism, culture and the public sector among others.

Our high risk areas

Four's primary high risk area with regards to any kind of modern slavery is when utilising third parties that we are trusted to buy external services from on behalf of many clients. These services can include printing, photography, venue hire, catering, and transportation. We have established a Supplier Code of Conduct on Forced Labour with which we will expect our suppliers to comply with. We may impose contractual obligations requiring compliance. We will review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we will take appropriate steps to address it. We will consider the conduct of each supplier against the code when awarding and/or renewing business with the supplier.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Health and Safety policy. This includes ensuring the well-being and safety of all staff and individuals affected by Four's operations. Four will address all concerns and monitor all situations where work of any kind is undertaken by staff or individuals.

Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Social value policy. Outlining our approach to sustainability, EDI, community and wellbeing.

Change Record

| Action | Authorised | Completed by | Date |
|--|--|--|------------|
| Policy reviewed and updated and published on the company website. | Einir Williams (Group Managing Director) | Jade Leon (Business Services Executive) | 25/07/2025 |
| Policy updated and rebranded to include B-Corp certification and added to the company website. | Einir Williams (Group Managing Director) | Einir Williams (Group Managing Director) | 31/01/2024 |
| Policy Updated and uploaded to the company website. | Einir Williams (Group Managing Director) | Einir Williams (Group Managing Director) | 28/01/2023 |