

## Modern Slavery Statement 2026/2027

This document constitutes adm Indicia's statement on modern slavery for 2026/2027. In this statement, "adm-Indicia" means and includes adm (Group) Limited and all affiliates, subsidiaries, and any other entities under its control or within its corporate group. adm-Indicia ("adm-Indicia", "us", "we") is dedicated to conducting business and relationships in a lawful manner. For the purposes of this statement, "adm" refers to the adm Group entities as constituted prior to the acquisition of the Indicia Worldwide group of companies and the formation of adm Indicia in July 2025.

### Introduction

At adm Indicia, we recognize that geopolitical instability, economic uncertainty, labour shortages, and inflationary pressures, can heighten the risk of human rights violations within global business operations and supply chains. These evolving challenges reinforce the importance for companies to maintaining robust governance, effective due diligence, and sustained vigilance in identifying risks that have the potential to negatively impact individuals and their communities.

adm Indicia remains steadfast in our efforts to make sure that modern slavery, in all its forms, is not taking place within our business or broader value chain. Through ongoing monitoring, supplier engagement, risk assessment processes, and enhancing internal controls, we continue to promote improvements to our supply chain management practices across our operations and supply chain.

adm Indicia is dedicated to acting in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) and other local, national or international frameworks applicable to our business. We continue to implement responsible sourcing practices aimed at strengthening labour standards and promoting human rights across our entire scope of operations. adm Indicia maintains a zero-tolerance policy towards all forms of modern slavery, including child labour, forced or compulsory labour, and human trafficking, whether in own operations or in our value chains.

Striving to meet our objectives for the coming year, we are more than ever resolved to guard against this persistent threat through developing our due diligence processes, increasing stakeholder engagement, and fostering a culture of transparency and accountability. Due to

adm Indicia's continuous growth globally we have again this year made further improvements to our practices, making sure that risks are managed effectively.

## Who we are

adm Indicia is a global marketing execution partner agency to some of the world's most iconic brands. We transform marketing execution by bringing together intuitive technology, our expertise in managing complex global supply chains, and a network of local experts to empower marketing, procurement, supply chain, and sales teams, bringing simplicity, visibility, agility, and efficiency to drive end-to-end marketing execution and performance.

In March 2025, Konica Minolta, Inc. sold its Indicia Worldwide marketing services group of companies to adm Group. Following a successful regulatory approval process, the two groups combined in July 2025 to form a business trading as adm Indicia, with headquarters in London and regional hubs in Hong Kong and New York. The acquisition creates a global footprint across more than 36 countries serving over 1000+ brands worldwide for clients. Our biggest offices with the highest number of employees being London (UK), Stamford (US), Noida (India), our Hong Kong office and Barcelona (Spain).

This global presence enables us to deliver the local activation of global strategies for clients worldwide. adm Indicia partners with many of the world's leading brands as a sustainable marketing execution provider, delivering supply chain solutions across a broad range of sectors. Our services span diverse industries and rely on extensive global product supply chains. adm Indicia sources and distributes products across Europe, Latin America, North America, the Middle East, and Asia through a broad network of suppliers and strategic partners.

We are dedicated to transforming marketing compromise into a powerful co-promise, creating and activating meaningful brand experiences that drive ROI. With joined-up strategy, execution, and seamless activation, our combined expertise means we can help brands deliver impact through every stage of the customer journey. Thereby protecting our planet and supporting human rights across the world. Our vision exemplifies our commitment to the highest standards of Corporate Social Responsibility (CSR) practices, and to a more sustainable, diverse, and inclusive future.

Our strategy enables us to deliver long-term value to all our stakeholders. adm Indicia's priority is to develop and operate agile supply chains, meeting the demands of our diverse set of clients and business partners, whilst helping to protect the lives of all those connected to them.

## Governance and Accountability

adm Indicia adheres to the highest standards of corporate governance and business ethics. We have created a robust governance structure to provide the necessary strategic oversight and operational implementation.

Respect for human rights sits at the core of our company, and governance is therefore embedded in our corporate structure throughout adm Indicia, from board-level committees to management-level group functions and business units.

The adm Indicia board is responsible for making sure adm Indicia meets its human rights responsibilities. Our human rights obligations are key elements of an annual corporate risk assessment process, which is overseen by the legal department on behalf of the adm Indicia board. The assessment is developed in conjunction with our regional operating boards and with the participation of senior leaders within adm Indicia.

## Our Policies

We continuously develop our approach and CSR strategy in line with international frameworks and requirements, including the four pillars of the UN Global Compact (UNGC): human rights, labour standards, environmental responsibility, and anti-corruption principles, and with reference to the UNGPs.

The execution of our CSR initiatives is supported by a series of internal policies. adm Indicia has implemented policies with the intention of making sure that modern slavery or any form of restricted labour practices do not occur within any part of our business or global supply chains. Our Anti-Slavery and Human Trafficking Policy is intended to provide additional guidance for anyone working in or on behalf of adm Indicia. The policy reinforces our commitment to preventing the presence of modern slavery, forced labour and all forms of human trafficking within our operations, globally. In 2020, adm published its first Human Rights policy in line with the UNGPs and the ILO Declaration on Fundamental Principles and Rights at Work. A combined Human Rights policy was completed in 2026 and is publicly available on our company website.

We strive to ensure these principles underpin everything that we do, from sourcing responsibly to making sure the rights of every worker affiliated with adm Indicia are safeguarded and protected. adm Indicia also has a range of human resources policies, which set out certain minimum standards regarding the human rights of our staff.

Our Employee Code of Conduct reflects our continued commitment to combating anti-slavery and human trafficking. The Code outlines adm Indicia's zero-tolerance approach to all forms of modern slavery, child labor, forced or compulsory labour, and human trafficking, providing guidance to employees and contractors on these important issues.

As adm Indicia continues to grow and expand our operations around the world, we uphold that all staff are aware of, and comply with, our global policies and procedures, and that they are consistently applied in our daily operations.

adm Indicia's Whistleblowing Policy additionally includes an independent third-party global ethics helpline available in multiple languages, providing an option for anonymous reporting. Our combined policy was completed in 2026 and is again designed to encourage employees to report matters of concern either internally or to an independent body (at their option), without fear of reprisal. If reported internally, employees can speak to our dedicated Whistleblowing Officer. For any matters reported externally the helpline is provided worldwide (via international free phone numbers) using interpretation services for non-English speakers. If an employee would rather not talk to someone, they may contact the independent third-party via a dedicated or generic e-mail option. Once a complaint is submitted either internally, or via the ethics helpline service, adm Indicia will launch an investigation into the complaint in line with our Whistleblowing procedures.

This year, one of our primary achievements was to expand this internal, formalized Whistleblowing helpline provided by our third-party provider to our critical supplier base. The helpline will be made accessible to all our Approved Supplier Lists (ASL) suppliers throughout 2026/2027, allowing workers site-level to report any work-related concerns they may experience including matters constituting forced or restrictive labour practices.

adm Indicia's Supplier Code of Conduct (SCOC), which amongst other areas, sets out our minimum standards in respect of the human rights of supplier staff, clearly reflect our position on these crucial matters and provides guidance and expectations to our suppliers.

The policies, coupled with our accession to the UN Guiding Principles and other recognized frameworks, are intended to help protect individuals' human rights. They demonstrate our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery, forced/compulsory labour and human trafficking is not present anywhere in our business or supply chains.

These key initiatives are fundamental to adm Indicia's ongoing efforts to adapt approaches and procedures to help ensure modern slavery in all its forms is eradicated, through encouraging proactive risk management by all staff and business partners. We will continue to develop our portfolio of policies and due diligence implementation relating to the prevention of modern slavery, so that we are always conducting business in an ethical and transparent manner.

## Due Diligence and Supplier Adherence

Recognizing the human rights challenges inherent in global sourcing and particularly given our expanding reach into certain higher-risk territories, adm Indicia considers its highest risk of modern slavery and forced labour practices to be in its product supply chains.

adm Indicia has several procedures in place designed for the specific purpose of monitoring and managing risk to human rights. Measures across our global value chain and operations are based on a multifaceted approach that ensures each issue is addressed appropriately, while enabling us to monitor critical areas as needed. Where we may cause or contribute to harm, we facilitate or provide effective remedy.

We conduct ongoing human rights due diligence (HRDD) across our supply chain, including risk identification, regular saliency assessments and gap analyses, implementation of mitigation measures, corrective action plans (CAPs) and remediation, supply chain mapping, monitoring and reporting through defined key performance indicators (KPIs), ongoing stakeholder engagement and communication.

We integrate human rights criteria into supplier onboarding, third-party social audits, and our expectations towards continuous improvement.

Through our due diligence activities, we place particular emphasis on addressing those rights that are most at risk of severe, adverse impact through our activities or business relationships, which we identify as our salient human rights issues. Addressing and mitigating these salient human rights risks is a critical element of this process.

Requirements to all our suppliers on how they are expected to manage human rights are included in our contractual agreements within our Supplier Code of Conduct. All suppliers must sign the Code as well as maintain compliant social audits.

## Audit Compliance

adm Indicia employs a rigorous supplier selection process. Audit compliance is a contractual requirement, both prior to a new supplier being on-boarded and then on a periodic basis. The audits are performed by independent and accredited third-party auditors in most regions, but may be done by our qualified, in-house auditors in Asia comprised of 22 dedicated staff at the time of publication.

We expect all our suppliers to comply with our social audit requirements by maintaining a valid and current audit status. Adherence to regular third-party audits, including SMETA 4P 7.0 or its equivalents, help us verify that supplier partners are upholding recognized work practices, including labour rights, and fair business operations.

Our contractual terms embed these stringent requirements for our business partners, including within our Supplier Code of Conduct. The Code sets out the minimum level of

compliance we expect all our suppliers to comply with, including requirements to their human rights practices. Compliance is monitored, and suppliers must sign the Code before they are added to our regional Approved Supplier Lists.

Standard practice is for audits to be conducted every 6 months to 3 years according to supplier audit status and region. The audit assesses compliance with and adherence to adm Indicia's Supplier Code of Conduct and our standards on Human & Labour Rights and Working Conditions. adm Indicia is a member of the Supplier Ethical Data Exchange (Sedex) and administers Sedex Members Ethical Trade Audits (specifically, the 4 Pillar SMETA audits 7.0). The audits inform adm Indicia about the living conditions, wages, overtime hours and other important working conditions of supplier staff and allow us to monitor and minimize risks of human rights abuses in our supply chain.

Should a supplier audit establish that a supplier is not in compliance with adm Indicia's CSR requirements, adm Indicia will address such concerns directly with the supplier and in most cases work with the supplier to resolve the issues. In instances where there may be any critical findings, including, but not exclusively concerning salient labour violations such as child labour, forced or slave labour, immediate disengagement with the supplier might be the outcome. For any such case and to try and resolve the matter, appropriate steps will, however, always be initiated with the supplier before any further actions or disengagement takes place. adm Indicia adopts a stricter assessment approach to Human & Labour Rights and Working Conditions than the 4 Pillar SMETA 7.0 audits require, which reflects our zero-tolerance approach to all forms of modern slavery, forced/compulsory labour, and human trafficking.

In 2022, adm also entered into an enterprise agreement with EcoVadis enabling us to assess a portion of our suppliers we identify as being a lower risk in our supply chain. This contract gives suppliers who are unable to go through a physical audit an opportunity to be a part of our regional Approved Supplier Lists.

## **Worker Voice Tools**

Caring for our stakeholders is a priority for adm Indicia. This includes meeting expectations as part of our due diligence responsibilities, making sure that workers connected to our business are employed under conditions that respect universally accepted human rights.

Acknowledging the limitations of audit-based oversight in complex value chains, adm incorporated anonymous Worker Voice Surveys and Worker Wellbeing Assessments since 2022 to increasingly monitor human rights. Both continue to be rolled out in what we consider higher-risk regions and to a selection of our ASL, tier-one manufacturing suppliers. The tools allow us to listen-in on any concerns workers in our supplier communities may experience that negatively impact their human rights. The questions they respond to cover specific areas that together help us understand how supplier labour standards are

integrated and ultimately enforced. From our findings, adm Indicia works actively to build improved work practices with our supplier partners, encouraging both development of supplier HRDD capabilities, and enhancing collaboration with our key business partners.

The process helps us counter and address any salient issues, or other human rights topics, which may be identified. The aim is for these initiatives to complement regular supplier audit assessments and our internal due diligence process.

One of the cornerstones of adm Indicia's CSR objectives is encouraging our suppliers to join the CSR journey with us and support them in improving their social, environmental and ethical compliance over time. The most important attribute we look for in a new supplier is a positive attitude towards CSR, demonstrating they are truly willing to learn and improve. We will still work with a supplier whose initial CSR credentials may be poor, provided they are willing to collaborate to implement changes and commit to a mutually agreed corrective action plan (CAP) in cases where this may be deemed necessary.

To further support and encourage this development adm launched a supplier HREDD (Human Rights and Environmental Due Diligence) matrix scorecard in 2023, incorporating social and ethical indicators to assess and enhance the management of human rights within our business operations. Our in-house expertise helps us guide suppliers to become more aware of social issues, leading to greater levels of social compliance.

## Measuring progress

At adm Indicia we are committed to managing the impacts of our operations, including the way we source products and services. This commitment is fundamental to how we work with our people, our partners, and our communities. It underpins our 'Assure' pillar, and our principles to drive positive, lasting outcomes through responsible business actions.

Our goal is to foster a culture of transparency and accountability, where every individual can work freely and safely.

All employment with adm Indicia is voluntary. We do not use child labour or any form of forced or compulsory labour in any of our operations or facilities. adm Indicia fully respects and complies with all applicable laws establishing a minimum age for employment, to support the effective abolition of child labour worldwide.

We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.

We use the following key performance indicators (KPIs) to measure ongoing progress on how effective we are in preventing forced labour and modern slavery taking place in any part of our business or supply chains:

## Internal

- Percentage of employees informed of adm Indicia's Policies and Standard of Practice (Employee Code of Conduct), i.e. on the issues of compliance, anti-corruption, health & safety, anti-discrimination, human and labour rights.
- Number of employees having completed our compulsory compliance training module annually on 'Modern Slavery'.
- Recruitment practices including right to work due diligence.
- Number of reported whistleblowing incidents related to a matter concerning modern slavery, forced/compulsory labour, and human trafficking. Including both internal and external reporting through our whistleblowing procedure.
- Number of new employees having completed our Sustainability onboarding training. The purpose of the onboarding pack is to provide our adm Indicia community with the necessary resources to embed sustainable practices in their day-to-day tasks.

## External

- Percentage of the total spend we manage that is placed with suppliers and sub-contractors vetted for ethical labour practices through regular audit compliance.
- Number and nature of reported audit non-compliances in the last year, including number of Corrective Action Plans (CAPs) initiated and resolved.
- Worker Wellbeing assessments and Worker Voice surveys conducted in internally defined higher-risk regions, aimed at identifying any worker concerns relating to work practices.
- Supplier maturity across social compliance indicators reported and identified by the HREDD scorecard matrix process introduced in 2023.
- Compliance with the adm Indicia Supplier Code of Conduct (SCOC) setting out the environmental, ethical, and social conduct requirements we expect all our suppliers to adhere to. The code was reviewed and updated for the combined business in 2025.
- The human rights saliency assessment completed in 2024, enabled us to effectively review our risk procedures and human rights due diligence framework, identifying key areas for prioritization, improvement and reinforcing our commitment to ethical and responsible business practices. KPIs are integrated as part of these processes.

- Number of reported whistleblowing incidents related to a matter concerning modern slavery, forced/compulsory labour, and human trafficking through our third-party helpline introduced in 2025 for our ASL supplier base.
- We uphold fair wages that meet or exceed legal and industry standards. adm was first certified as a Living Wage employer by the Fair Wage Network (FWN) in 2023, ensuring that all our global employees are paid a decent and recognized salary for the work that they do. Re-Certification was again achieved in 2024. Following the integration of adm and Indicia in 2025, adm Indicia decided to extend this commitment across the combined business, making sure that all our staff globally are paid at or above recognized living wage benchmarks. In 2025, we achieved FWN re-certification as a combined business with 100% of our employees in scope.

adm Indicia equally works to communicate with and support our strategic suppliers in their efforts to pay their workers a living wage. To help bring this agenda forward and to keep ourselves accountable to progress, adm decided to publicly commit to the UNGC Forward Faster initiative in 2024. Adequate earnings can support workers globally in avoiding situations pertaining to forced labour conditions and strengthens the global network in challenging restrictive practices and the prevalence of modern-day slavery.

## Training

It is important that all our employees are aware of, and comply with, our global policies and procedures. This involves ensuring they are consistently applied in day-to-day activities through effective implementation and training.

Only through increased awareness can true improvements to human rights take place. This also applies to adm Indicia and the responsibility all our staff hold towards promoting respect and adherence to human rights principles, in every aspect of the work that they do. By building awareness, fostering a culture of accountability, and equipping our teams with the tools and learning that they need, we can collectively contribute to meaningful progress.

We believe knowledge empowers, which is why adm Indicia's online Global Compliance training program, includes a specific module on Modern Slavery. It is a mandatory requirement for all employees to complete the course on an annual basis, to ensure there is a high level of understanding of the risks but also mechanisms available to prevent modern slavery and human trafficking across the business. The course includes an assessment at the end of each module, making sure the content has been understood.

adm Indicia monitors completion levels on an ongoing basis and issues periodic communications via various means to staff to ensure compliance levels are maintained. As before, each course will be available in multiple languages, providing support towards participation across our global workforce.

## Labour Standards

adm Indicia abides by all applicable laws and regulations regarding pay practices and the classification of employment according to job level and status. We have procedures in place to ensure any new member of staff fulfils criteria on the eligibility to work, with all necessary due diligence measures in place.

We respect our employees' right to choose to join or not join a trade union, or to have employee representation in accordance with local laws.

As we continue to scale and move into more higher-risk territories, adm Indicia deploys the necessary employee onboarding processes. Some notable aspects of our processes are:

- As a certified Living Wage employer we benchmark pay in each region to ensure all employees are paid fairly for their work and meeting the regional living wage standard.
- Regional health and safety assessments are carried out in all working environments to ensure we are providing a safe working environment for our staff.
- We do not employ anyone under the statutory minimum age within each respective jurisdiction.
- Candidates either apply directly or through verified third-party agencies for employment. We have standards on working conditions that all employees are informed of. These include rest breaks and working hours, all of which are planned in accordance with applicable local laws and regulations.
- Employees who are sent on secondment are provided with suitable accommodation.

Employees are made aware of this statement and our internal and external policies regarding modern slavery and human trafficking.

Similarly, do we expect all our suppliers and business partners to comply with all relevant local labor laws and regulations to uphold equitable and ethical labor practices for their employees, as outlined in our Supplier Code.

## Diversity, Equity, and Inclusion

Diversity is an important part of who we are. Our vision is to ensure that all of our people can reach their full potential without having any unfair barriers put in their way. Slavery disproportionately impacts those experiencing oppression based on their gender, race, class, religion, or other identities.

Our commitment to preventing modern slavery is supported by our Diversity, Equity and Inclusion (DEI) Policy and broader human rights framework. Through our DEI Policy, we prohibit discrimination, promote equal opportunity, foster an inclusive workplace, and encourage employees to raise concerns through established grievance and reporting mechanisms.

As a global business, we believe that our diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage. At the time of publication, we have close to 1300+ employees across the globe who are spread over more than 36 countries and represent numerous, varied diversity characteristics.

We strive to foster an equitable and inclusive culture and are committed to evolving our range of benefits and employee engagement initiatives to support our people. Through our Supplier Code of Conduct, we have our suppliers sign, and the ethical/compliance audits carried out on our suppliers, we seek to ensure our partners do not discriminate against anyone and ensure modern slavery is not taking place in their businesses.

## Partnerships

We recognize the importance of partnerships in everything we do. adm Indicia continues collaboration and commitment to combat modern slavery also through our membership with AIM-Progress, a forum of leading Fast-Moving Consumer Goods (FMCG) manufacturers and common suppliers, focusing on capability building and practices to drive positive impacts on human rights. adm Indicia is currently an active member of its Living Wage, Grievance Mechanism, and Forced and Child Labour working groups and was the first business within our sector to be chosen as a member. Specifically, AIM-Progress supports the Consumer Goods Forum's resolution on eradicating forced labour and its priority industry principles, which seek to counter problematic and common employment practices which can lead to cases of forced labour. Members assemble to enable and promote increasingly responsible sourcing practices and sustainable supply chains. Being a member of this forum allows adm Indicia to keep abreast of best industry practice in the management of modern slavery risks and to drive continuous improvement in our risk and due diligence practices.

Key to progressing on managing the risk of modern slavery is also our continued partnership with Ulula, enabling us to 'listen in' to workers globally through anonymous worker voice surveys and to address any concerns they may have. The process offers a critical tool in

capturing possible violations of workers' rights, including those of a more salient nature, such as incidences of modern slavery that may be present.

## Looking Forward

By the continued pressures felt by many suppliers across the world, we take our responsibility in helping to protect workers against abusive and illegal practices seriously. adm Indicia is proud of the steps it continues to take to manage the risk of modern slavery across its business and in meeting its commitments over the years. We believe we have built a strong foundation to help manage the risks of modern slavery in all its forms across our global operations, and we will continue to promote transparency, increased due diligence practices and to resolve any possible breaches or non-compliance related issues that may arise in our supply chain.

This statement has been approved by the board of directors of adm (Group) Limited on 18 September 2026.

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Edward Colflesh Group CEO

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out steps taken by adm (Group) Limited and the other relevant group companies during year ending 31 December 2025 to prevent modern slavery and human trafficking in its business and supply chains.