



Modern Slavery Statement 2025/2026

This statement constitutes adm-indicia's statement on modern slavery and human trafficking for 2025/2026. "adm-indicia" means and includes adm (Group) Limited and all affiliates, subsidiaries, and any other entities under its control or within its corporate group.

Introduction

Persistent challenges continue to negatively impact global supply chains and human rights. At adm-indicia, we recognize that these challenges, including geopolitical instability and times of hardship, can significantly contribute to the risk of human rights violations taking place. Therefore, we understand the importance and need for sustained vigilance across supply chain management, to ensure efforts are maintained towards the eradication of any form of modern-day slavery and to secure best practices.

As in previous years adm-indicia remains steadfast in our commitment to make sure that modern slavery, in all its forms, is not taking place within our business or broader value chain. We are dedicated to acting in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) and 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 our own operations or in our supply chains.

Striving to meet our objectives for the coming year, we are more than ever resolved to guard against this persistent threat by strengthening our due diligence processes, enhancing 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 such risks are managed effectively.

Who we are

Established in 1992, adm-indicia is one of the largest, independent marketing services in the world, with an interconnected company consisting of close to 1400 employees across 30 countries, allowing us to deliver local activation of global



strategies for clients across the world. adm-indicia has its headquarters in London, United Kingdom and is a sustainable marketing execution partner to many of the world's leading brands, providing supply chain solutions to a broad spectrum of clients. Our service spans across several diverse sectors, using product supply chains which are global and extensive. adm-indicia sources and distributes products in Europe, Latin America, North America, the Middle East and Asia through a high number of suppliers and strategic partners.

We are committed to our vision of transforming marketing activations to deliver Sustainable brand execution, thereby protecting our planet, and supporting human rights across the world. Our vision exemplifies our commitment to the highest standards of Environmental, Social and Governance (ESG) 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 as part of this is therefore to develop and operate agile supply chains, also 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

adm-indicia is committed 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.

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 Group General Counsel 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 the adm-indicia.

Our Policies

We are continuously developing our approach and Corporate Social Responsibility (CSR) strategy based on international frameworks and requirements, including the UN Global Compact's four pillars of: human rights, labour standards, environmental and anti-corruption principles, and with reference to the United Nations Guiding Principles on Business and Human Rights (UNGPs).

In addition to a solid governance structure, 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 is not taking place anywhere in our business or global supply chains. A key initiative is the development of our Anti-Slavery and Human Trafficking Policy. The Policy objective is to provide extra details and guidance for those working for adm-indicia, or on behalf of adm-indicia, and to reinforce our continued commitment to ensure modern slavery or any form of forced labour is not present within our operations, globally. In 2020 adm-indicia also published its first Human Rights Policy in line with the UNGPs and the ILO Declaration on Fundamental Principles and Rights at Work.

We strive to make sure 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.

In 2021, our Employee Code of Conduct was updated to reflect our revised position on anti-slavery and human trafficking; setting out adm-indicia's zero-tolerance to all forms of modern slavery, forced/compulsory labour and human trafficking, providing our workforce and contractors guidance on these important issues. As adm-indicia continues to grow and expand our operations around the world we are committed to making sure that all staff are aware of, and comply with, our global policies and procedures (including those which integrate the Ten Principles of the Universal Declaration on Human Rights), and that they are consistently applied in our daily operations.

adm-indicia's Whistleblowing Policy was introduced in 2019, which also includes an independent third-party global ethics helpline available in multiple languages, providing an option for anonymous reporting. The policy was reviewed and updated in September 2025 and is 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 claim is

submitted either internally, or via the ethics helpline service, adm-indicia will launch an investigation into the claim in line with adm-indicia's Whistleblowing Policy. The third-party ethics helpline will also be available for the workforce of our strategic supplier partners in 2025.

Our Supplier Code of Conduct, which amongst other areas, sets out our minimum standards in respect of the human rights of supplier staff, was updated in 2025 to clearly reflect adm-indicia's position on these crucial matters and to provide guidance and expectations to our suppliers.

The policies, coupled with our accession to the UN Guiding Principles and other recognized frameworks intended to protect individuals' human rights, reflect 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.

All these key initiatives demonstrate adm-indicia's ongoing efforts to adapt approaches and procedures to help ensure modern slavery in all its forms is eradicated, through encouraging active risk management by all staff and business partners. We will continue to develop our portfolio of policies and due diligence practices 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 high-risk territories, adm-indicia considers its highest risk of modern slavery and forced labour practices to be in its product supply chains. adm-indicia employs a rigorous supplier selection process, with due diligence checks in the form of ethical/compliance audits (including factory audits), 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.

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 audits require, which reflects our zero-tolerance approach to all forms of modern slavery, forced/compulsory labour, and human trafficking.

To increase our due diligence measures, adm-indicia gradually began to incorporate worker voice feedback from 2023. This work is done in collaboration with our third-party technology partner Ulula through anonymous worker surveys and is currently conducted in some of our internally defined higher-risk regions. The process helps us to 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.

In 2022, adm-indicia 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.

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 in cases where this may be deemed necessary.

To further support and encourage this development adm-indicia launched our 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

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:

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 indicators.
- Number and nature of reported audit non-compliances in the last year, including number of Corrective Action Plans initiated and resolved.
- Worker Wellbeing and Worker Voice assessments conducted in internally defined high-risk regions, aimed at identifying any worker concerns also relating to work practices.
- Supplier maturity across social compliance indicators reported and identified by our HREDD scorecard matrix process introduced in 2023.
- Compliance with the adm-indicia Supplier Code of Conduct setting out the environmental, ethical, and social conduct requirements we expect all our suppliers to adhere to. The code was reviewed and updated in 2025.

- Through our human rights saliency assessment conducted last year, we have been able to effectively review our human rights due diligence framework, identifying key areas for prioritization, improvement and reinforcing our commitment to ethical and responsible business practices.

Internal

- Percentage of employees informed of adm-indicia's Policies and Standard of Practice (Global Employee Handbook), 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 on preventing human trafficking.
- 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.

Training

We believe knowledge empowers, which is why adm-indicia's online Global Compliance training program, includes a specific module on preventing human trafficking. 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 of 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

All employment with adm-indicia is voluntary. We do not use child or forced labour in any of our operations or office facilities. 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 fully respect all applicable laws establishing a minimum age for employment, to support the effective abolition of child labour worldwide.

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 high-risk territories, adm-indicia deploys rigorous employee onboarding processes, which help us manage our own risks of modern slavery in the workforce. Some notable aspects of our processes are:

- We benchmark pay in each region to ensure all employees are paid fairly for their work and meet the regional living wage standard and have been Living Wage certified by the Fair Wage Network organization since 2023.
- A health and safety assessment is carried out in all working environments to ensure we are providing a safe working environment for all 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 to minimize our modern slavery risks.
- 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 sent to serviced apartments which have been checked by our Human Resources team for suitability.

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

In 2019, we improved our global induction program to ensure all countries are using the same criteria to onboard our employees. This provides consistency and assists us in making sure we are using the right standards for everyone, everywhere that we have employees.

Similarly, we expect all our suppliers and business partners to comply with all relevant local labor laws and regulations and 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.

We respect the varied diversity characteristics (including race, disability, gender, LGBTQ+, neurodiversity, religion, belief and age and anything else that is important to people) of every one of our team members and others in our networks.

As a 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 1400 employees across the globe who are spread over 30 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. Furthermore, we are fully committed to the ethical management of our supply chain, driving towards social and environmental excellence.

Our Effectiveness in Combatting Modern Slavery

In May 2025 adm-indicia was again rated in the top 1% of over 50,000 companies assessed for CSR by EcoVadis, the leading platform for environmental, social, and ethical performance ratings for global supply chains. CSR analysts reviewed adm-indicia's global supply chain and CSR practices across the following four pillars: Environment, Labour and Human Rights, Sustainable Procurement and Business Ethics. With an overall ranking in the top 1%, adm-indicia achieved a 'Platinum' rating for the 5th consecutive year achieving its highest score of 87/100.

We recognize the importance of partnerships in everything that 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, Responsible Recruitment and HREDD 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 due diligence practices.

Key to progressing on managing the risk of modern slavery is also our partnership with Ulula, that enables us to 'listen in' to workers globally through worker voice surveys and to address any concerns they may have. The process offers a critical tool in capturing any violation of workers' rights, including those of a more salient nature, such as incidences of modern slavery that may be present.

One of our key achievements during this reporting period was to achieve recertification status as a Living Wage employer, meaning that all members of our workforce earn a recognized living wage. Going forward, adm-indicia will also work to communicate with and support our strategic suppliers in their efforts to pay their workers a living wage. 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.

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 in order 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 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 21 September 2025.

DocuSigned by:

A handwritten signature in black ink, appearing to read 'Edward Colflesh'.

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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 2024** to prevent modern slavery and human trafficking in its business and supply chains. References to 'adm-indicia', 'us', 'our', or 'we' are to adm (Group) Limited and all affiliates, subsidiaries, and any other entities under its control or within its corporate group.