

# Modern Slavery and Human Trafficking

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Department: Human Resources

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# Modern Slavery and Human Trafficking

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| Description      | This is our public facing copy of Reveals Modern Slavery and Human Trafficking policy, included internally in chapter 30 of the employee handbook issued to all employees. |
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## 1. Reveal's Modern Slavery Act 2015 statement

This document constitutes Reveal Media Limited's Modern Slavery and Human Trafficking Statement, published in accordance with section 54 of the Modern Slavery Act 2015, and sets out the steps we are taking during the financial year 1 January 2026 to 31 December 2026 to prevent modern slavery and human trafficking in our business and supply chains.

This statement is published on our website, approved by the Board of Reveal Media Limited, and signed and dated by our Chief Operating Officer as a Board Director. Internally, employees acknowledge this policy via Read & Accept.

## 2. Purpose and Scope

The purpose of this policy is to set out Reveal Media Limited's commitment to preventing modern slavery and human trafficking and to describe the controls we use to identify, assess and address risks in our business and supply chains.

This policy applies to all Reveal Media employees and directors, as well as contractors, agency workers and other third parties acting on our behalf. It also applies to our suppliers, business partners and labour providers, particularly where they provide goods or services that support our operations or products.

## 3. Definitions: Modern Slavery and Human Trafficking

Modern slavery is a serious crime and a violation of fundamental human rights. It is an umbrella term covering:

- **Slavery:** where a person is treated as if they are owned by another, and their freedom is significantly restricted.
- **Servitude:** where a person is forced to live and work for another person and cannot leave, often linked to coercion, threats, or abuse.
- **Forced or compulsory labour:** where a person is made to work against their will, under threat of punishment or through coercion. This can include debt bondage, withholding identity documents, withholding wages, intimidation, or excessive control over a worker's movement.
- **Human trafficking:** the recruitment, movement, harbouring or receipt of people by means such as threat, force, deception or abuse of vulnerability, for the purpose of exploitation. Exploitation may include forced labour, sexual exploitation, criminal exploitation, or domestic servitude.

Modern slavery can occur in any sector and can be difficult to detect. It may involve direct employment practices, agency labour, subcontracting, or be embedded within wider supply chains for goods and services.

## 4. Indicators of Modern Slavery and Human Trafficking

In the context of Reveal, concerns are most likely to arise through interactions with suppliers, subcontractors, labour providers, or during recruitment and site visits. Examples include workers being unable to speak freely or appearing under the control of another person; people not knowing who employs them or how they will be paid; evidence of recruitment fees or unreasonable deductions; retention of identity documents; unclear or secretive subcontracting arrangements; and working or living conditions that appear unsafe, excessively controlled, or inconsistent with lawful employment. Any concerns should be reported promptly using the routes set out in this policy.

Reveal provides training to our employees to build an understanding of the sorts of practices

that could fall into Slavery and Human Trafficking, in order to make it more likely that if encountered, it will be identified and reported.

## 5. Reveal's Ethos on Slavery and Human Trafficking

Reveal Media Limited is committed to combatting Slavery and Human Trafficking and takes responsibility for ensuring that its working practices comply with the Modern Slavery Act 2015. This Policy Statement 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 within our Company or Supply Chain.

## 6. Governance and Accountability

Overall responsibility for this policy sits with the Chief Operating Officer (COO), who is also a Board Director. The ISO Manager supports the regular review and update of the policy as part of our management system.

Operational responsibilities are as follows:

- **Supplier due diligence and onboarding:** The VP of Finance is responsible for issuing the External Provider Assurance Questionnaire for new suppliers and maintaining the critical suppliers' log. The ISO Manager supports assurance activity through the management system.
- **Escalation and decisions:** Where issues or concerns are identified during onboarding or supplier management, these are escalated to the COO and VP of Finance, with input from our legal support where required (including contracts and NDAs).
- **Management oversight:** Modern slavery risks and relevant supplier assurance topics can be raised through our monthly Management System Review meeting, chaired by the ISO Manager.

This policy is reviewed annually as part of our annual policy cycle. Where updates are made, the current version will be published on Reveal Media's website.

## 7. Risk assessment

We recognise that modern slavery can occur in any sector and can be difficult to detect. Our risk exposure is influenced most by supply chain factors rather than our direct UK operations. We assess modern slavery risk on a proportionate, risk-based basis and consider factors such as:

- countries and regions associated with higher labour-rights risk
- the use of subcontracting and agency labour
- the type of goods and services we purchase, including whether work is labour-intensive
- the supplier's own controls, governance and transparency

**Our supply chain profile** includes manufacturing partners and suppliers in **China, Hong Kong and Thailand**, and a global supplier footprint. We maintain oversight of manufacturing activity through regular supplier engagement and visits (at least twice per year), including senior management oversight based in Hong Kong.

Where we identify higher risk, we apply enhanced scrutiny and escalation, and we prioritise assurance activity for suppliers classed as critical.

## 8. Reveal Supply chain and due diligence controls

We aim to ensure that third-party suppliers are subject to proportionate onboarding and assurance checks so risks can be identified and assessed before work begins.

## Supplier onboarding and assurance

As part of onboarding:

- suppliers are asked to complete our External Provider Assurance Questionnaire to establish baseline governance and controls and to identify any areas requiring follow-up
- responses are reviewed internally by the VP of Finance and/or the ISO Manager
- where relevant, suppliers are required to sign our Supplier Code of Conduct, including commitments relating to forced labour, child labour and human trafficking
- where appropriate, suppliers are required to enter contractual terms and NDAs, reviewed through our legal support
- suppliers are required to agree to relevant contractual commitments, including compliance with applicable laws and our expectations relating to ethical conduct and modern slavery

We apply a risk-based approach. While we aim to issue the questionnaire for all new suppliers, we prioritise and ensure completion for suppliers assessed as critical and maintain a critical suppliers log. At the start of 2026, we updated our supplier onboarding questionnaire to include modern slavery questions and are undertaking a retrospective assurance exercise to gather this information for existing critical suppliers.

### Ongoing oversight

Our contract templates and core processes are reviewed annually through our ISO quality management system. In practice, we also follow up with suppliers where key certifications have lapsed or require renewal (for example, requesting updated ISO certification where previously held). Where appropriate, we may request supporting evidence and follow up on areas of concern on a risk basis.

### Employee responsibilities when engaging suppliers

All employees who procure goods or services on behalf of Reveal are responsible for engaging with known and trusted suppliers. This includes considering potential risks when introducing new suppliers or subcontractors and raising any concerns through the appropriate internal routes.

## 9. Recruitment and labour practices

We are committed to lawful, fair and transparent recruitment and employment practices. Our HR onboarding controls include verifying identity and right to work in the UK and maintaining appropriate personnel records.

As part of our onboarding process, we may also use, where appropriate:

- references and employment history checks
- background screening through a third-party screening provider
- police vetting for roles where this is applicable

We make use of third parties for certain employment administration arrangements in specific locations (for example, payroll administration in China and Hong Kong, and a third-party arrangement for a small team in Portugal and Italy). These providers are expected to operate to lawful and ethical standards and are subject to our onboarding and supplier assurance approach.

## 10. Training and Awareness

All employees, including those involved in the procurement of goods and services have been specifically provided with a copy of the Policy and instructed to ensure that

their suppliers have been notified and have confirmed their compliance. As part of our regular online compulsory training, employees are asked to complete “*Spotting, preventing and reporting human trafficking*”

## 11. Reporting and escalation

All employees have a responsibility to remain alert to potential indicators of modern slavery and human trafficking, and report concerns promptly using the routes below.

Any colleague who has a concern about suspected modern slavery or human trafficking in our business or supply chains is expected to report it promptly. Concerns can be raised:

- via our internal non-conformance reporting route ('Flag it')
- via our Whistleblowing Procedure
- directly with the COO

We treat reports seriously and aim to handle them sensitively and, where possible, confidentially. Retaliation against anyone raising a concern in good faith is not tolerated.

Where a concern is logged through *Flag it*, it will be initially reviewed by the ISO Manager and escalated promptly to the COO and/or Head of HR as appropriate. Legal support will be involved where required.

### External advice and reporting

Colleagues may also seek confidential advice from the [UK Modern Slavery & Exploitation Helpline \(Unseen\)](#), or report concerns via the [UK government modern slavery reporting route](#).

### Responding to concerns and remediation

Our response will be proportionate to the nature and severity of the concern. Our priority is to protect people from harm and respond responsibly, recognising that abrupt disengagement can sometimes increase risk to affected individuals.

If a concern relates to a supplier or third party, it will typically be assessed by the COO and VP of Finance, supported by the ISO Manager and legal support as needed. Actions may include:

- immediate risk assessment and, where necessary, pausing work while facts are established
- engagement with the supplier to understand the issue and require corrective action, including a timebound corrective action plan where appropriate
- escalation through our internal priority issue process where appropriate
- seeking advice and, where required, reporting to relevant authorities
- termination of the supplier relationship where remediation is not possible or where a supplier is unwilling to address the issue

Where an individual may be at risk or affected, support is available through HR and our Employee Assistance Programme (EAP), alongside other wellbeing support available internally.

## 12. Monitoring and Review

We monitor the effectiveness of our approach through practical measures. From 2026 onwards, this includes:

- **Critical supplier assurance coverage:** We aim for full completion of modern slavery assurance for all critical suppliers via our supplier assurance process, reviewed at least annually. Where a risk is identified, it is logged and managed through our internal non-conformance reporting process (“Flag it”).

- **Supplier issues and remediation:** We track relevant issues identified through onboarding or supplier management, actions taken, and closure status.
- **Training and policy acknowledgement:** We monitor completion of mandatory training and policy acknowledgement via our Read & Accept system, with escalation where completion is overdue.
- **Management oversight:** Modern slavery risks and supplier assurance themes are reviewed through the monthly Management System Review meeting, chaired by the ISO Manager, with escalation to the COO where required.

Where concerns are raised, we record and track them through our internal processes (including our non-conformance route where suitable) so that outcomes, corrective actions and any lessons learned can be evidenced and reviewed.

This policy is reviewed at least annually as part of our annual policy cycle and updated where required to remain current and aligned with best practice.

**All employees have a responsibility** to remain alert to potential indicators of modern slavery and human trafficking and to report concerns promptly using the routes set out in this policy.

### 13. Approval

This policy is approved by the Board of Reveal Media Limited and is reviewed at least annually, and sooner if there are material changes to our business, supply chains, or legal requirements. Signed for and on behalf of Reveal Media Limited:

Signature: 

Name: Lawrence Corbett

Title: Chief Operating Officer (Board Director)

Date: 03/02/2026

## 14. Appendix 1: Other Relevant Policies

- Human Rights Policy - L-HRES-13-V1-DS-Human Rights-INT
- Supplier code of conduct (*l-cgov-5-v1-rg-supplier code of conduct-pub*)
- Our employee handbook (*l-hres-10-v1.5-ds-employee handbook-int*) including:
  - Anti-bribery and corruption policy (section 15)
  - Whistleblowing policy (section 17)
- Master control of external suppliers (f-ims-84-gap-v2-master-control of external suppliers-int)
- External provider assurance questionnaire - f-ims-84a-gap-v1.0-master-external provider assurance questionnaire-int

## 15. Appendix 2: Corrective action template

### Corrective Action Plan (CAP)

- CAP reference:
- Date raised:
- Raised by:
- Supplier / third party:
- Supplier contact (name, role, email):
- Reveal owner: (COO / VP Finance / ISO Manager / HR)
- Related contract / PO / site / location:

#### 1) Issue summary

- What was identified (facts only):
- How it was identified: (questionnaire / audit / visit / allegation / incident report)
- Date(s) of incident / observation:
- Risk category:
  - Modern slavery risk
  - Labour practices
  - Subcontracting
  - Recruitment fees
  - Document retention
  - Other:
- Severity:  Low  Medium  High
- Immediate risk to individuals:  Yes  No  Unknown

#### 2) Immediate containment actions (within 0–48 hours)

*(What you will do now to prevent harm or stop the situation worsening)*

- Containment action(s):
- Owner:
- Due date:
- Evidence to provide: (photo, policy excerpt, payroll proof, communication log, etc.)
- Reveal verification method:
  - Desk review
  - Call/meeting
  - Site visit
  - Third-party verification

#### Safeguarding / do no harm check

- Could any action increase risk to affected individuals (e.g. retaliation, job loss, exposure)?  Yes  No
- If yes, how will that risk be mitigated?

#### 3) Root cause analysis

*(Keep it simple. The point is to avoid repeat issues.)*

- Likely root cause(s): (process gap, subcontractor control, training gap, incentives, lack of oversight, etc.)
- How you know: (what evidence supports this conclusion)

#### 4) Corrective actions (to fix the issue)

| Action    | Owner      | Due Date | Evidence Required | Status                      |
|-----------|------------|----------|-------------------|-----------------------------|
| 1. Action | Owner name | DD/MM/YY |                   | Open/ In Progress/ Complete |
|           |            |          |                   |                             |
|           |            |          |                   |                             |

|  |  |  |  |  |
|--|--|--|--|--|
|  |  |  |  |  |
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### 5) Preventive actions (to stop recurrence)

| Action    | Owner      | Due Date | Evidence Required | Status                      |
|-----------|------------|----------|-------------------|-----------------------------|
| 1. Action | Owner name | DD/MM/YY |                   | Open/ In Progress/ Complete |
|           |            |          |                   |                             |
|           |            |          |                   |                             |
|           |            |          |                   |                             |

### 6) Subcontractors and labour providers (if applicable)

- Does this issue involve a subcontractor / labour provider?  Yes  No
- If yes, name(s) and what actions apply to them:
- How will you ensure subcontractors comply going forward?

### 7) Evidence pack checklist (tick what will be supplied)

- Updated policy/statement
- Recruitment fee prohibition confirmation
- Proof of ID document control practice
- Worker grievance/whistleblowing route details
- Training records
- Payroll / working hours sample (redacted)
- Contract / supplier terms update
- Audit report / visit notes
- Other:

### 8) Reveal review and closure

- Review date(s):
- Reviewed by:
- Verification completed:  Yes  No
- Outcome:  Closed  Kept open  Escalated
- Escalation required:  Yes  No
- Escalated to:  COO  HR  Legal  MSR meeting
- Closure note (brief):

### 9) Sign-off

- Supplier sign-off (name, title, date):
- Reveal sign-off (name, title, date):