

Modern Slavery & Human Rights Statement

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Introduction

Our values and culture at DEPT® fundamentally prioritise the utmost respect for human rights. As a Certified B Corp, we are dedicated to high standards of social & environmental performance and we are held accountable to those high standards and expectations by all stakeholders – our investors, employees, clients, community and supply chain.

In this context, we publish our Global Modern Slavery & Human Rights Statement (“Statement”) to acknowledge our commitment to preventing modern slavery and safeguarding human rights. We do not tolerate any form of modern slavery, human trafficking, or human rights violations and we are committed to embedding practices that protect human rights throughout our operations and supply chain.

This Statement is being presented in fulfillment of Digital Agency Holding B.V (“DEPT®”), and its subsidiaries’ obligations under, inter alia, the UK Modern Slavery Act of 2015 and the Australian Modern Slavery Act 2018. This Statement relates to actions and activities taken during the 2023 financial year to mitigate risks of modern slavery within our business operations and supply chain. These procedures will be carried forward and enhanced in the years that follow.

Our Commitment to Human Rights

DEPT® is dedicated to having a positive impact through our business, and as a fundamental building block to that ambition we recognize that upholding human rights throughout our operations is critical to the impact we want to create for the world. We seek to uphold the UN

Guiding Principles on Business & Human Rights:

- We firmly oppose any violation of human rights in our business activities and are committed to promptly addressing any potential issues, in a timely and appropriate manner.
- Through our operations and supply chain, we work to prevent and mitigate any negative human rights risks that are directly related to our operations, products, and services.
- If we recognise that we have caused or played a part in adverse human rights impacts, we will take responsibility and provide remediation through legitimate processes.
- We regularly explore ways to actively support the promotion of human rights not only within our operations but also through stakeholder engagement and education in the areas where we have influence.

Furthermore, we commit to:

- Strictly reject any use of child labour and will comply with all relevant laws in this regard.
- Strict condemnation of forced, bonded involuntary labour and human trafficking throughout our internal operations and supply chain.
- Ensuring that all DEPT® employees work in a secure and healthy environment, in compliance with local applicable laws.
- Prohibit and reject any threat of physical and verbal abuse, sexual harassment, or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all employees in DEPT®’s Global Handbook.

- Actively seek out employee opinions regarding DEPT® and its operations. We respect employees' rights to belong to trade or labour unions, and fully comply with any applicable legal obligations to inform and consult employees on decisions or measures that may have a major impact on their experience.
- Ensuring that working hours are reasonable and comply with applicable laws and industry standards.
- Ensuring that work performed by employees is on the basis of recognised employment law and practice.
- Reviewing wages and living wage rates each year to ensure all full-time and part-time employees earnings are at or above their local living wage, where applicable.
- Eliminating discrimination in recruitment, training, professional growth, and working conditions, on grounds of race, ethnicity, sex, age, religion, political opinion, nationality, sexual orientation, disability, or any other protected characteristic or demographic factor.

Organisational Structure & Supply Chain

DEPT® is a global digital agency pioneering technology and marketing. We enable clients to digitise processes, products, services, transactions, and marketing at speed. We support the digital transformation and products of our clients at the core of their business through the creative and media that bring those products to the market.

DEPT®'s ultimate parent company is Digital Agency Holding B.V. We have subsidiaries in countries where we operate, such as the UK (for example Dept Marketing Technology Ltd, Dept Design & Technology Ltd and Dept Personalised Content Group Ltd) and Australia (Dept Digital Products Holdings Pty Ltd and Dept Personalised Content Pty Ltd).

Our team of over 4,000 digital specialists spans over 30 offices and 20 countries. Roughly 55% of our employees are located in Europe, 40% in the Americas and 5% in Asia Pacific. DEPT® operates as a remote enabled organisation with larger "hub" offices in cities such as, Amsterdam, Rotterdam, London, Berlin, Chicago, New York, San Diego, Mar del Plata, Melbourne and Mumbai.

Based on our risk analysis of direct operations, we do recognize that DEPT® has a physical presence in some countries that are at higher risk for modern slavery, however, based on the characteristics of our business model, our employees are broadly skilled professionals that are historically at low risk of being victims of modern slavery.

Outside of our direct internal operations, as a services firm, most of what we procure through our supply chain is focused on ensuring that our teams are well-supported to deliver the digital experiences and optimization our clients need. Our largest purchases span the following categories:

- Technology, IT & Telecommunications
- Office-related expenditures (rent, energy, etc.)
- Pension & Benefits Plans
- General professional services (legal, accounting, consulting)
- Travel
- Freelance Talent
- Marketing

As with our direct operations, based on our risk assessment, the industries in which our suppliers operate are not at significant risk of modern slavery or human rights violations, as the services we procure are primarily carried out by skilled professional workers. Furthermore, the majority of our largest suppliers are based in low-risk jurisdictions where compulsory modern slavery legislation is in place.

Related Policies

The following global policies and procedures are key components of our overall commitment to ensuring we safeguard human rights, ethics, impact and sustainability throughout our operations worldwide:

Code of Conduct: The DEPT® Code of Conduct sets out how we expect our staff, management and board to behave in the workplace. It covers topics related to employee conduct and expectations and avoiding conflicts of interest. Ultimately, it seeks to ensure that all DEPT® Employees create a safe, respectful and inclusive workplace through accountability, integrity and fairness both in our direct operations and through our value chain.

Speak Up Policy & Global Grievance Policy: DEPT® has adopted two primary global policies to provide DEPT® Employees with appropriate and safe recourse to report issues and grievances of concern at the global level. In addition, there are a number of local, country specific procedures that provide space for employees looking to report concerns or be heard. Our Speak Up Policy provides DEPT® Employees with options and instructions on how to report suspicions of misconduct (whistleblower procedure). This includes: violations of the law or code of conduct, conflicts of interest, improper use of assets, improper record keeping, fraud, bribery, health & safety issues or harassment and discrimination. The Speak Up Policy also assures that no disciplinary measures will be taken against DEPT® Employees that submit a concern in good faith. Our Global Grievance Policy covers work-related issues and disagreements and similarly provides DEPT® Employees with options and instructions on how to elevate grievance of concern.

Global Living Wage Commitment: We recognize that in order to be a leading employer with the ability to attract and retain diverse talent we need to pay livable wages all over the world.

As such, DEPT® is committed to paying a living wage for all full time and part time employees across DEPT®. This commitment excludes interns, flex contracts and apprenticeships (individuals on payroll for small projects to supplement their full time jobs), due to the nature of those roles.

Diversity, Equity & Inclusion Policy: Diversity, Equity & Inclusion is a core aspect of our values and ambitions at DEPT®. We seek to have every employee at DEPT® feel that they belong and see themselves represented. Our Diversity, Equity & Inclusion Policy outlines our expectations for conduct, speaks to our Diversity, Equity & Inclusion commitments & goals, and provides guidance for anyone looking to raise feedback or complaints.

Sustainability Policy: The DEPT® Sustainability Policy provides employees with the information and tools they need to make sustainable decisions at work, whether in the office or remotely. The policy outlines our expectations for prioritising sustainable, ethical and local suppliers when procuring goods and services for our offices.

Supplier Code of Conduct: We count on our suppliers to demonstrate responsible business practices throughout their operations. The Supplier Code of Conduct outlines the social, environmental, and governance expectations and commitments we expect our suppliers to meet and comply with.

Anti-bribery and anti-corruption policy: DEPT® is committed to conducting its business with the highest standards of integrity, transparency, and ethical behavior. This policy outlines our zero-tolerance approach towards bribery, corruption, and unethical practices. It complements DEPT®'s Code of Conduct as a separate and independent policy, further emphasizing the importance of its provisions and stressing DEPT®'s obligation as an employer to ensure all employees understand the importance of preventing bribery and corruption. Finally, it also ensures compliance with the latest regulations and legislation.

Supply Chain Management & Due Dilligence

As noted, we count on our suppliers to demonstrate responsible business practices through their operations, and outline these expectations through our Supplier Code of Conduct and Supplier Screening Procedures. We know that robust partnerships with our suppliers are an integral part of safeguarding human rights and managing the social & environmental impacts across our supply chain.

Three primary procedures and policies govern our approach to managing the impacts of our supply chain:

- Supplier Code of Conduct
- Supplier Screening Procedures
- Supplier Risk & Opportunity Assessments

These procedures aim to serve as both proactive and preventative measures to ensure we're incentivizing responsible practices and mitigating risks throughout our supply chain. All employees are expected to review documentation related to ethics within our internal operations and supply chain via DEPT®'s Global Handbook. Employees responsible for procurement are also given additional training on these procedures.

Supplier Code of Conduct: DEPT® suppliers are expected to sign and adhere to our Supplier Code of Conduct, which includes the environmental, social and governance standards we expect them to adhere to. The DEPT® Supplier Code of Conduct covers topics related to diversity and non-discrimination, child labor, forced labor, freedom of association, remuneration and benefits, working hours, safe working conditions, and other social impact and sustainability measures.

Furthermore, the Supplier Code of Conduct is designed to foster awareness and educate our suppliers across various environmental, social and governance topics.

Supplier Screening Procedures: Suppliers are expected to complete an annual Supplier Questionnaire during which they are asked to provide details on their policies and practices across a wide range of impact and sustainability topics, including but not limited to, child labour, forced labor, corruption, ethics, emissions, diversity & inclusion and stakeholder engagement.

Supplier Risk & Opportunity Assessments: Through the completion of the Supplier Questionnaire, DEPT® is able to conduct comprehensive risk and opportunity assessments for both our current & potential new suppliers. This enables us to:

- Identify potential supply chain risks or non-compliance with the Supplier Code of Conduct;
 - When the threat of non-compliance or significant risk emerges in our supply chain, we respond by requiring our suppliers to create clear remediation plans. If we identify a supplier at high risk of human rights violations or modern slavery, we will take the appropriate measures, including the potential termination of our relationship with them;
- Preference relationships with suppliers aligned with our overall impact goals. This may include suppliers with B Corp or other ESG Certifications, suppliers that are locally-owned, or owned by underrepresented communities and other purpose-driven suppliers; and
- Hold our suppliers accountable for improving their sustainability and social impact initiatives, including the implementation of remediation plans when necessary.

Monitoring & Improving Effectiveness

To assess the effectiveness of our efforts in combating modern slavery and safeguarding human rights, we will regularly monitor:

- Suppliers that have signed the DEPT® Supplier Code of Conduct;
- Suppliers that have completed the DEPT® Supplier Questionnaire; and
- Suppliers that have been identified as “high risk”, and any relevant remediation plans established

As we continue to monitor the effectiveness of our procedures against modern slavery and human rights violations, we are considering activities that improve our overall programming such as;

- Provide ongoing training to relevant roles among DEPT® to emphasize the importance of implementing and monitoring the activities outlined in our Supplier Code of Conduct; and
- Reviewing the scope and coverage of our Supplier Code of Conduct and Screening Procedures to ensure relevant and material suppliers have completed the procedures.

Managing Supply Chain Impact

Within DEPT®, the discussion and preparation of As noted, screening our suppliers allows us to not only assess supply chain risks but also allows us to award positive practices across our supply chain for suppliers that share our commitment to mission, sustainability, and social impact.

In late 2023, and early 2024 we initiated screening for ~30% of our supply chain on a spend basis, prioritizing our largest suppliers. Initial findings across all suppliers, based on spend, indicate that:

- 20% of spend is derived from from to suppliers that have our Supplier Code of Conduct
- 15% of spend is derived “preferential suppliers”, those that are local, diverse and/or are managing their environmental impact
- 8% of spend is derived suppliers that are owned/led by those from underrepresented backgrounds
- 11% of spend is derived from local suppliers
- 12% of spend is derived from suppliers that have implemented measures to track their Carbon Footprint
- 1% of spend is derived from suppliers that are subject to Remediation Plans

Following this screening as well as risk and opportunity assessment, we aim to reinforce sustainable and impactful practices throughout our supply chain by:

- Sharing recommended resources for improving performance, such as guidance on measuring Carbon Footprint, developing a Code of Conduct or Human Rights Policy, best practices for developing a corporate Diversity, Equity & Inclusion strategy and/or Corporate Giving commitment
- Arranging one-on-one meetings to facilitate an exchange of knowledge and best practice across any relevant sustainability & impact topics
- Requesting additional information and/or remediation procedures from suppliers operating in high-risk countries, ensuring adherence to ethical and responsible standards.

We believe that these resources will provide valuable insights and practical guidance to strengthen our suppliers' commitment and contribute to our shared sustainability goals.

Consultation & Approval

Within DEPT®, the discussion and preparation of related documents supporting our commitment to ensuring we safeguard human rights, ethics and impact is held on a global level. As such, this Statement has been compiled first by the DEPT® Global Impact Team (responsible for our overall Environmental, Social & Governance activities, including procurement) and the Global People team (responsible for the wellbeing of workers and contractors across our operations), after which our DEPT® Global Legal team performed specific legal research in consultation with local legal experts and the local business teams specifically in the UK and Australia.

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