

Anti-slavery Policy

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INDEX

- 1 INTRODUCTION
- 2 THE JAKALA GROUP
- 3 SCOPE OF APPLICATION
- 4 ETHICS BUSINESS
- 5 RISK ASSESSMENT AND MANAGEMENT
- 6 DUE DILIGENCE
- 7 MONITORING AND CONTROL
- 8 DISCLOSURE OF THE DOCUMENT

1 INTRODUCTION

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Jakala Group's slavery and human trafficking statement for the financial year ended 2022.

This policy is part of the Jakala Group's policy management system, which also includes the Suppliers' Policy of Conduct; the Policy on the Protection of Human Rights; the Organization Management and Control Model; the Code of Ethics, and the Group Code of Ethics.

The Jakala Group (hereinafter also "**Jakala**" or "**Company**") operates in an industry where slavery is not prevalent. Jakala does not tolerate any form of slavery in its business, and it endeavors to do what it can to eliminate slavery in all its business relationships.

For this reason, the Company endeavors to ensure that slavery and human trafficking do not take place in its supply chains. Jakala seeks to manage ethically, and with integrity, these risks, adopting a non-tolerance approach to slavery and human trafficking.

Jakala takes great care not to deal with organizations that may be involved in slavery or human trafficking and is committed to respecting and protecting the human rights of all workers especially those who are part of its supply chain.

2 THE JAKALA GROUP

Jakala is a market leader in the marketing services sector and operates in Italy, and internationally through its overseas subsidiaries located in strategic countries for this sector. The Company is active in the field of "Loyalty and Engagement" and "Advisory and MartTech" (including Digital Marketing services), as a B2B service provider. In particular, the Group's activity focuses on providing its customers with strategic, analytical, digital, and technological support for their businesses, sales networks, and distribution channels.

The Group, in the year 2022, with more than 1650 employees and 44 offices worldwide, combines expertise in the media and digital acquisition areas with those in CRM, data analysis, strategy, and consulting, in order to offer customers integrated and complete business solutions in all respects.

The Group operates on an international basis, sourcing expertise in areas where local strengths guarantee technical knowledge and production capacity, considering the complexity of the activities required. The Group's business model requires a continuous search for and selection of key partners, ideally situated in close proximity to local offices to promote fruitful collaboration.

3 SCOPE OF APPLICATION

This Policy applies to any person, entity, company, supplier, or other partner involved in the supply to the Company of any goods or services or the undertaking of any activities, including those of supply chains (hereinafter "**Stakeholder**"). For the purposes of this document, Stakeholders include all those who engage directly or indirectly with the Company.

This Policy applies without limitation to suppliers relating to all product and service classes in which Jakala Group has any involvement. Jakala endeavors to make each Stakeholder aware of the principles set out in this Anti-Slavery Policy and of the requirement to respect their application. Therefore, anyone who engages in direct or indirect relations with the Jakala Group must not:

- participate, directly or indirectly, in any form of slavery of any persons for any purpose and particularly in any form of exploitation or denial of liberty or the provision of services under coercion;
- participate, directly or indirectly, in any form of human trafficking of persons for any purpose and particularly be involved in any movement of persons, whether with or without consent, with a view to the exploitation of such persons;
- promote or collaborate in the sexual exploitation activities of any person;
- use forced or involuntary labor in the performance of any activity; and
- seize and retain an individual's identity or immigration documents and deny that individual access to these documents.

4 ETHICS BUSINESS

Jakala has zero tolerance for slavery and human trafficking.

To ensure all those in its supply chain and contractors comply with its values, Jakala has created an "ethical system" ("Ethics Business") that includes, in addition to this Policy, the following policies relating to:

- Suppliers' Code of Conduct;
- the Protection of Human Rights;
- the Organization, Management and Control Model;
- the Code of Ethics and the Group Code of Ethics;
- the Anticorruption Policy

and any other policies that is published in the website <https://www.jakala.com/sustainability/>.

Suppliers are required to comply with applicable laws and regulations in the countries in which they operate, and in the countries of destination of the products, including, but not limited to, laws relating to labor law, human rights, health and safety, environmental liability, anti-corruption, animal health and welfare, safety and quality of products and services.

If local regulations are less stringent than the principles contained in the Suppliers' Policy of Conduct, the latter undertake to take the necessary measures to comply with what is indicated in this document.

Suppliers will always be responsible for any omissions or violations of the Policy by them and their supply chain.

The Supplier is obliged to hire only workers who have the legal requirements for access to work, according to the rules of the country in which it operates. Where Suppliers use a migrant worker as a workforce, i.e. a person who carries out or has exercised a paid activity in a State of which he is not a citizen, they must ensure compliance with all the rules for a management of the employment relationship that protects an inclusive and non-discriminatory selection, recruitment and remuneration process.

Suppliers are required to protect the human rights of their employees, treating them with dignity and respect.

5 RISK ASSESSMENT AND MANAGEMENT

The selection of business partners takes place on a worldwide basis, depending on the required demand for various categories of goods and services, through an evaluation approach based on specific requirements, in addition to the economic ones, such as:

- product certifications, if possible, with sustainability characteristics;
- the ISO Certification of the supplier;
- ESG scoring/rating;
- the **ISO, SMETA, FAMA** and **BSCI** social requirements; and
- social audits requested directly by Jakala.

During the evaluation and supply phases there will be a continuous interaction with the supplier, in order to verify that the final supply of goods or services reflects the expected quality levels.

The Jakala Group undertakes to comply with the laws of each country in which it operates.

During the internal risk assessment, it was found that the risk of slavery or human trafficking occurring among its own workforce is very low both considering the nature of Jakala's business which is services focused, since most of Jakala's employees are hired directly by the Human Resources team. Nevertheless, the risk of slavery or human trafficking occurring in the supply chain is likely to be higher than those directly employed by Jakala. Consequently, an attempt has been made to assess this risk by examining factors such as the type of product or service supplied and the geographical location of the supplier.

The Jakala Group has therefore identified several potential risk factors that may indicate the occurrence of slavery and human trafficking in the supply chain, for example, where there is:

- the use of migrant workers or workers from overseas, who may be more vulnerable to being compelled to provide their services under coercion; unfair working conditions; deceptive or coercive recruitment procedures; debt slavery; or exploitation associated with denial of liberty or restrictions on free movement;
- establishments with a poorly performing human resources department whose employment records are missing or incomplete or inaccurate which may be a sign of exploitation or debt slavery, or issues of human rights;
- frequent salary deductions across the workforce which may be a sign of debt slavery or coercive and exploitative working practices.

6 DUE DILIGENCE

Jakala requires suppliers, contracting with the Company and its subsidiaries, to sign the Code of Ethics and the Suppliers' Code of Conduct Policy. These documents outline those principles and guidelines that underpin the Company's business activities and guide and govern the behavior and actions of all those with whom Jakala engages. By signing the Code of Ethics, Jakala's suppliers undertake to observe these principles and to require their subcontractors to comply with these principles in their own dealings with Jakala's suppliers. A breach of the Code of Ethics by a supplier constitutes a breach of contract and depending on the gravity of the breach may entitle the Company to terminate the supplier's contract.

Jakala is committed to the goals of having this policy and the Code of Ethics and the other policies of the Ethics Business of Jakala, adopted by all participants in the supply chain and of promoting awareness of the policies and the need for compliant conduct. Where necessary, Jakala will take corrective steps to improve both the scope of its policies and their implementation in their supply chains.

Jakala introduced an evaluation system for assessing its suppliers. It is a feature of this system that it will ascertain its suppliers' compliance with human rights as well as sustainability standards including environmental, ethical, and labor practices.

Jakala, using an audit platform, will assign weights to key performance indicators to establish an overall score for its suppliers, allowing it to measure how well its suppliers perform regarding a wide range of business practices and ethical issues.

Specifically, in this regard, the Group also requires all suppliers and partners to accept the Code of Ethics, the Human Rights Policy, the Supplier Code of Conduct and the General Principles of Ethics Business published here <https://www.jakala.com/wp-content/uploads/2022/10/Report-Sostenibilita.pdf>.

7 MONITORING AND CONTROL

The Jakala Group, with a view to the continuous monitoring and improvement of its policies and practices, has identified the following key actions:

- internal and sustainable sourcing of its requirements for goods and services where possible; and where it is not possible nor reasonable to do so, to focus on suppliers who have in place systems and controls that seek to avoid slavery and human trafficking in their businesses and supply chains;

- initial due diligence activities aimed at new suppliers in order to understand their business and supply chains and in particular to assess their ethical and social standards, including respect for human rights;
- implementation of appropriate key performance indicators to measure, if possible, the Company's effectiveness to ensure that slavery and human trafficking do not take place in its businesses or supply chains.

8 DISCLOSURE OF THE DOCUMENT

This policy is communicated to all employees, depending on the areas of operation, roles, and responsibilities, and is made available on the Jakala Company website to all stakeholders, including collaborators, suppliers, and partners; so that there is full awareness and further impetus towards the promotion of human rights as an integral part of the Jakala Group's value system.

In addition, as an improvement action, Jakala is implementing trainings having in-depth insights on ESG pillars, with an eye toward human rights as well.

Approved by the board of directors of Jakala S.p.A. S.B: on 20th January 2023

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