Modern Slavery and Human Trafficking Statement

Purpose

Sapia&Co Pty Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its operations, supply chain, and products. We have zero tolerance towards slavery and require our supply chain to comply with our values.

Whilst this Modern Slavery and Human Trafficking Statement responds to Section 54(1), Part 6 of the UK Modern Slavery Act 2015 and relates to actions and activities for the UK financial year ending 31 March 2026, we also acknowledge legislation such as the Australian Modern Slavery Act 2018. The controls set out in this statement cover our entire Company, not just the UK affiliate.

Organisational Structure

Sapia&Co Pty Ltd is the group's Australian parent company. It is registered in the United Kingdom with Companies House as a foreign company. The UK company, registered with Companies House, is Sapia&Co UK Pty Ltd. The group has business operations in Australia, the United Kingdom and the United States of America.

We operate in the information technology sector. We work with several key suppliers, mainly providing computing, IT software (SaaS) and marketing services.

For more information about the Company, please visit our website: https://sapia.ai/.

Policies

We have several internal policies to ensure we conduct business ethically and transparently.

These include the following:

- Recruitment and selection policy—We conduct 'right to work' checks on all prospective employees. In the UK, we follow the guidelines published by the Home Office at https://www.gov.uk/check-job-applicant-right-to-work. We also check if prospective employees have a criminal record. These checks are replicated across the world, following local legislation.
- Employee code of conduct—We are committed to the fair treatment of all personnel. Our code of conduct reflects our core values and expected behaviours. It makes it clear that we have a zero-tolerance approach to modern slavery.

- Whistleblowing policy—We operate this policy so that employees can raise concerns about how personnel are treated or practices within our business or supply chains without fear of reprisal.

We ensure our suppliers know our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Protect whistleblowers.

Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Creating an annual risk profile for key suppliers.

We do not consider ourselves to operate in a high-risk environment. The majority of our supply chain is based in the UK, Australia, and the United States of America, none of which appear in the human rights group *Walk Free*'s top 10 countries with the highest prevalence of modern slavery. Whilst it is reported that more than 1.1 million people in the United States are subject to modern slavery, we and our suppliers operate in a low-risk industry.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance, or we will terminate our agreement.

Effectiveness

The Company measures its effectiveness and ensures that slavery and human trafficking are not occurring in its business and supply chains. We will contact key suppliers to inquire about their

modern slavery practices every 12 months and carry out a regular audit of suppliers, including at least 25% of suppliers each year.

Approval

The statement was approved in Sapia.ai's GRC platform by Barb Hyman, CEO, on behalf of the board of directors.