

**SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023**  
**(pursuant to section 54(1) of the Modern Slavery Act 2015)**

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes Reply's Modern Slavery and Human Trafficking Statement for the financial year 2023.

**1. Organisation structure and supply chains**

Reply is a group that specialises in technology consulting, system integration and digital services with a focus on the conception, design and development of solutions based on the new communication channels and digital media. Composed of a network of companies, Reply partners with key sectors to define business models. This is made possible by the new technological and communication fields such as artificial intelligence, big data, cloud computing, digital communication and the Internet of Things. Reply is characterised by:

- a culture focused on technological innovation;
- a flexible structure that is able to anticipate market developments and interpret new technological drivers;
- a delivery method of proven success and scalability;
- a network of companies that specialise in specific areas of expertise;
- teams composed of specialists, recruited from the best universities;
- a highly experienced management team;
- continuous investment in research and development;
- long-term relationships with its Clients.

With 14,798 employees worldwide (as of 31 December 2023), Reply operates via a network of companies that specialise in processes, applications and technologies, each centre of excellence in their respective fields of expertise.

Reply Limited and its UK Affiliates are part of a global network of Reply Companies in the Reply Group. From time to time, we subcontract elements of our client engagements or operations to other Group Companies, for example when providing services in compliance with our business model. Our Group Companies are therefore part of our supply chain. In our risk assessment and due diligence activities we distinguish between member of the Reply Group in our supply chain and third-party suppliers. All the Reply Companies are founded on and practice the same values and ethics, and share the same commitment to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas.

Reply takes a zero-tolerance approach to slavery and human trafficking by its own organisation, its employees, agents or consultants or any person or body acting on its behalf; it also repudiates child and forced labour. Reply is committed to implementing effective measures to ensure that slavery and human trafficking are not taking place: (i) in any of its supply chains; and (ii) in any part of its own business.

**2. Policies in relation to slavery and human trafficking**

In pursuit of the goal of keeping the highest ethical standards and avoid any form of slavery and human trafficking activities, Reply Group has adopted the following appropriate policies, which we continuously review and update:

- 1) A Code of Ethics to ensure that Reply Group's key ethical values are clearly defined and constitute the basic element of corporate culture, as well as to set a standard of conduct for all those working for Reply Group with regard to business and non-business affairs. The Code of Ethics is intended for all the Group's stakeholders: shareholders, employees, independent contractors, suppliers, customers, and business partners.  
It should be noted that in all contracts entered into by Group companies, independent contractors and suppliers are required to accept and apply the Group's Code of Ethics and from 2022, the Supplier Code of Conduct. The social nature criteria used to assess suppliers are specific to the various countries. In particular, for the United Kingdom the Modern Slavery Policy has also been issued for suppliers.  
By requesting our suppliers to comply with our Code of Ethics, we are committed to upholding the human rights of workers in our supply chain and treating them with dignity and respect, ensuring safe working conditions, and conducting responsible ethical operations. For this reason, the selection of suppliers and stipulation of terms and conditions applicable to the purchase of goods and services for Group companies are dictated by the values and criteria of legality, competition, objectivity, integrity, impartiality, fair price, quality of goods and/or services, with a careful evaluation of product warranty and range of offers.
- 2) A Modern Slavery and Human Trafficking Policy which 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 in our supply chain. This Policy applies to all Stakeholders including all persons working for or on behalf of the Reply Group in any capacity, including employees at all levels, directors, officers, agency, workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. The Policy should be read in conjunction with Reply's Code of Ethics and Whistleblowing Policy.
- 3) A Human Rights & Labour Policy to confirm, together with the Code of Ethics, Reply Group's commitment to the protection of human rights, favouring diversity, inclusion, avoiding any form of discrimination based on ethnicity, gender, sexual orientation, physical and health conditions, disability, age, nationality, religion or personal opinions, guaranteeing the physical and mental well-being of employees and their professional growth. We expect the same from our suppliers and strive to enable and influence their management to develop, maintain and follow their own ethical HR policies.  
The Human Rights & Labour Policy affirms respect for the Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights promulgated by the United Nations, and the conventions issued by the International Labour Organization.
- 4) A Whistleblowing Policy which ensures the effectiveness of the above Policies' provisions and avoids any episode of discrimination. Our whistleblowing system is specifically aimed to report irregularities or violations of applicable regulations or internal procedures, guaranteeing the anonymity of reports.

### **3. Key performance indicators**

In 2021, Reply joined the United Nations Global Compact committing to support the Ten Principles on Human Rights, Labour, Environment and Anti-Corruption promoted by the initiative, and to contribute to the achievement of the Sustainable Development Goals:

#### 1 – Human rights

- Support and respect the protection of internationally proclaimed rights within the realm of our influence;
- Ensure that we are not complicit, not even indirectly, in human rights abuses.

#### 2 – Labour

- Uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Eliminate all forms of forced and compulsory labour;
- Effective abolition of child labour;
- Elimination of discrimination in respect of employment and occupation.

#### 3 – Environment

- Support a precautionary approach to environment challenges;
- Undertake initiatives to promote greater environmental responsibility;
- Encourage the development and diffusion of environmentally friendly technologies.

#### 4 – Anti-corruption

- Work against corruption in all its forms, including extortion and bribery.

### **4. Due Diligence, risk assessment and training**

The validity of Reply's Corporate Social Responsibility management model is recognised by rating agencies and by ESG indices, which guarantee transparency in communication to investors and comparability with peers, as well as increasing the Group's visibility on the financial market.

- Since 2012 Reply has participated in the CDP (formerly the Carbon Disclosure Project), one of the most important international non-profit organisations for reporting on Climate Change, and in 2023 it confirmed the B level, in continuity with the 2022 result, as proof of its commitment to climate change;
- Reply has been confirmed as low risk in the Sustainalytics index, the leading rating agency in the assessment of companies in the ESG area;
- In 2023, Reply was awarded a score of 62/100 by the Scoring Agency Ethifinance and was awarded the Silver Medal (a marked improvement on 2022, when the score was 54/100).
- Reply has been included in the ESG Mib Index, which identifies the major Italian listed issuers with the best ESG practices. The index combines the measurement of economic performance with ESG ratings in line with the principles of the United Nations Global Compact.
- The composition of the ESG Mib Index is also based on the analysis of ESG criteria by Vigeo Eiris, which assesses the ESG performance of issuers. In 2023, Reply achieved a score of 53/100, higher than the industry average, and with a specific score in the energy transition of 64/100, which corresponds to the highest advanced level.

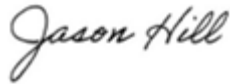
- In 2023, Reply was rated A by MSCI, a leading international company in the provision of information tools to support the investment decisions of global investors.
- In 2023, Reply achieved the Silver Medal in the EcoVadis evaluation, confirming its performance with a score of 64/100, an improvement on the previous one.

Actions taken and results achieved by our Company and Reply Group thanks to the integration of the above Ten Principles in its strategies and business operations have been reported on the Reply Group's Consolidated Disclosure of non-financial information 2023 available on our corporate website.

Within the induction process, all new employees receive training on the principles of the Modern Slavery Act 2015 and are requested to accept Reply's Modern Slavery and Human Trafficking Policy.

Our Company will continue to assess and manage risks of unethical behaviour in all respects, including but not limited to the Modern Slavery Act 2015, and will continue to develop our approach to truly global ethical employment standards for our employees and our suppliers.

Signed by

A handwritten signature in cursive script that reads "Jason Hill".

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Jason Hill, Chief Executive Officer UK