

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out 2Heads Global Design Ltd (“2Heads”) policies, structure and due diligence relating to modern slavery and is made pursuant to section 54 of the Modern Slavery Act 2015.

2Heads define modern slavery as an umbrella term for all forms of slavery, human trafficking and exploitation.

Overview and Scope

2Heads is a full-service experiential marketing agency creating meaningful and interactive experiences for a wide range of international blue chip brands. With offices in London, LA and Montreal, 2Heads deliver projects worldwide.

Our commitment to raising awareness of Modern Slavery reflects our open culture of communication, with channels that enable colleagues, customers, suppliers and other business partners to raise concerns.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we are committed to preventing it in our business activities and ensuring that our supply chains are free from, slavery and human trafficking.

Our Policies and Training

We regularly review and update our policies and codes of conduct to ensure compliance with the Modern Slavery Act, and to improve our processes both within our business and across our supplier network.

- Our **Diversity, Equity and Inclusion (DEI) policy** supports our goals to build an inclusive culture where all colleagues are valued and respected.
- Our Supplier Code of Conduct sets out 2Heads’ commitment to ethical, legal, and sustainable business practices. We work in partnership with our suppliers to uphold high standards in labour, health and safety, environmental responsibility, and product integrity, and expect the same commitments throughout our supply chain.
- Our **Recruitment processes** are compliant with UK employment law, including eligibility to work checks, the issuing of employment contracts and checks to ensure that anyone employed with us is aged 16 or above.
- Our **Pay and Rewards processes** are benchmarked within our industry and reviewed annually, with a wide range of support offered to improve employee wellbeing. We ensure full compliance with UK legal wage requirements and expect our suppliers to do the same, ensuring their pay practices are aligned with industry standards, regionally benchmarked, and reflective of client expectations.
- We operate a **Whistleblowing Policy** so that all employees know that they can raise concerns about how colleagues are being treated or practices within our business or supply chain without fear of reprisals. This includes access to a reporting line which is operated by an independent organisation.
- Our **Anti Slavery Policy** summarises 2Heads commitments to identify and prevent the presence of Modern Slavery and Human Trafficking in our operations.

We operate a rigorous supplier vetting process, including location visits, supplier score carding, and annual inspections to help identify and address risks such as modern slavery, human trafficking, and poor working conditions. In addition, all colleagues managing supplier relationships have a clear understanding to recognise these issues and understand how to raise concerns effectively.

Structure

2Heads has appointed senior colleagues to key responsibilities to ensure compliance with this statement as follows:

- Any known or suspected breaches of modern slavery and/or human trafficking within the business would be investigated by the HR Manager and reported to the Managing Director.
- The HR Manager and Global Operations Director are responsible for reviewing this statement and associated policies regularly to ensure they meet legal and company requirements.
- The HR Manager is responsible for identifying appropriate training on modern slavery and human trafficking that will be delivered to all employees at 2Heads
- The Global Operations Director holds responsibility for identifying and addressing any breaches of our anti-modern slavery standards across the supply chain. This includes, but is not limited to, scrutinising purchases involving unworkable deadlines, unrealistic pricing, or the commissioning of work at rates below the applicable national minimum wage.
- The Global Operations Director is responsible for reporting any identified breaches promptly to the Managing Director for further action.

As detailed in 2Heads' Anti-Slavery Policy and other policies, we are committed to the following key principles:

- We prohibit employees, directors, officers and representatives from engaging in threats, harassment, discrimination, or confiscating worker's original identification documents.
- We guarantee workers' freedom of movement, association and the right to resign from employment with the company.
- We provide access to remedy, compensation and justice for victims of modern slavery.
- We provides employees and managers with appropriate information to ensure understanding and compliance with this policy.

Due Diligence within our Organisation

2Heads requires all new staff to provide proof of right to work in the UK before employment commences. Physical checks of employee's passports or birth certificates are always conducted by the HR team.

2Heads will occasionally use reliable and dependable employment agencies to source staff. All new agencies are subject to supplier screening.

Due Diligence and Risk Assessment within our Supply Chain

We engage only with suppliers who comply with laws regarding eradication of human trafficking and slavery. After thorough examination of our supply chain, we affirm that neither we nor any organization within our supply chain, be it direct or indirect suppliers, engages in the use of forced labour to the best of our knowledge.

Our Supplier Code of Conduct outlines 2Heads' commitment to:

- Ethical business practices
- Legal compliance
- Sustainable operations

We work in partnership with our suppliers to uphold high standards in:

- Labour conditions
- Health and safety
- Environmental responsibility
- Product quality and integrity

We expect these standards to be reflected consistently throughout our entire supply chain

Modern slavery considerations are integrated into each stage of the procurement process. We evaluate potential suppliers before they enter the supply chain, conducting thorough assessments to ensure alignment with our anti-modern slavery standards.

We maintain a preferred supplier list, conducting due diligence on all suppliers before allowing them to become a preferred supplier.

Key Performance Indicators

Performance against this statement and our Modern Slavery and Human Trafficking policy is measured against the following indicators. Between May 2025 and July 26, we will:

- Introduce training for all colleagues with the aim of increasing our employee's awareness of the Modern Slavery Act 2015.
- Ensure all reported incidents are investigated and recorded.
- Ensure all relevant suppliers are subject to Modern Slavery due diligence checks.

Approval for this Statement This Statement was approved by the Board of Directors on 10th July 2025
The next review will be completed by August 2026.

Signed:

Paul Godwin, Managing Director, 2Heads Global Design Ltd