

THE GROVE MEDIA MODERN SLAVERY POLICY AND STATEMENT

Document Control

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Applies To:	All employees, directors, contractors, freelancers, suppliers and business partners of The Grove Media Limited
Classification:	Internal

1. Purpose

The Grove Media is committed to conducting business ethically, responsibly and with respect for human rights.

We have a zero-tolerance approach to modern slavery, forced labour, child labour, servitude and human trafficking and are committed to preventing these practices within our operations, supply chain and business relationships.

This Policy and Statement sets out our commitment to combating modern slavery and the steps we take to identify, manage and mitigate potential risks.

2. Scope

This policy applies to:

- All employees;
- Directors;
- Freelancers, consultants and contractors;
- Suppliers and service providers;
- Business partners; and
- Any individual acting on behalf of The Grove Media.

All individuals and organisations associated with the Company are expected to uphold the principles set out in this policy.

3. Our Commitment

The Grove Media is committed to:

- Acting ethically and with integrity in all business relationships;
- Promoting respect for internationally recognised human rights;
- Opposing all forms of slavery, servitude, forced labour, compulsory labour and human trafficking;
- Complying with applicable laws relating to modern slavery and human rights;
- Working with suppliers and partners who share our commitment to responsible business practices; and
- Encouraging a culture of openness in which concerns can be raised without fear of retaliation.

4. Our Business and Supply Chain

The Grove Media is an independent UK communications and media business operating a remote-first working model.

Our supply chain is primarily comprised of professional services providers, media owners, publishers, technology platforms, production partners, consultants and other service providers that support the delivery of our services.

While we consider the overall risk of modern slavery within our operations to be relatively low, we recognise that risks may exist within broader supply chains and subcontracted activities.

5. Risk Management and Due Diligence

The Grove Media seeks to identify and manage potential risks of modern slavery within its operations and supply chain.

Where appropriate, the Company may:

- Review supplier policies and standards;
- Assess potential suppliers before entering into significant business relationships;
- Seek information relating to labour practices and employment standards;
- Consider ethical, environmental and human rights factors during supplier selection and procurement activities;
- Review concerns raised through internal reporting channels; and
- Take appropriate action where concerns are identified.

Due diligence activities will be proportionate to the nature of the supplier relationship and the level of potential risk.

6. Supplier Expectations

We expect suppliers, contractors, consultants and business partners to share our commitment to ethical business practices and the prevention of modern slavery.

Suppliers should:

- Comply with applicable employment and human rights legislation;
- Treat workers fairly and with dignity and respect;
- Ensure work is undertaken voluntarily;
- Prohibit forced labour, trafficking and child labour;
- Maintain appropriate working conditions; and
- Raise concerns where unethical practices are identified.

Where serious concerns arise, The Grove Media reserves the right to review, suspend or terminate supplier relationships where appropriate.

7. Employee Awareness and Training

The Grove Media recognises the importance of awareness and education in preventing modern slavery.

Employees may be required to complete training relating to:

- Modern slavery and human trafficking;
- Human rights and ethical business conduct;
- Anti-bribery and corruption;
- Responsible procurement and supplier management; and
- Whistleblowing and speaking up procedures.

Training requirements may be reviewed periodically as part of the Company's broader compliance and sustainability programme.

8. Reporting Concerns

Employees and other stakeholders are encouraged to raise concerns if they suspect modern slavery, human trafficking or unethical labour practices.

Concerns may be reported to:

- A line manager;
- A Director; or
- Through the Company's Whistleblowing Policy.

All concerns raised in good faith will be treated seriously and investigated appropriately.

The Company will not tolerate retaliation against any individual who raises a genuine concern in good faith.

9. Compliance

Compliance with this policy is expected of all employees and individuals acting on behalf of the Company.

Failure to comply with this policy may result in:

- Internal corrective action;
- Disciplinary action where appropriate;
- Termination of employment or engagement; or
- Review or termination of supplier arrangements.

The Company reserves the right to take any additional actions considered appropriate to address breaches of this policy.

10. Related Policies

This policy should be read alongside:

- The Grove Media Employee Handbook;
- Whistleblowing Policy;
- Anti-Bribery and Corruption Policy;
- Mental Health and Wellbeing Policy;
- Information Security and Data Protection Policy; and
- Any other Company policy relevant to ethical business conduct and responsible business practices.

11. Review and Approval

The Grove Media will review this Policy and Statement periodically to ensure it remains effective, reflects current legislation and aligns with best practice.

This Policy and Statement has been approved by the Board of Directors and will be reviewed annually, or sooner where required by legislative, regulatory or business developments.