

## Modern Slavery Act Statement

### Financial Year ended 31 December 2025

Studio Graphene is dedicated to ethical practices, ensuring our operations and supply chains are free from modern slavery and human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2025.

### Organisation's Structure

We design, develop and support web platforms and applications for mobile devices. We have over 100 employees and operate in the United Kingdom, India and Portugal.

### Supply Chain

Our key suppliers tend to be significantly larger entities such as:

- Amazon Web Services.
- Google Workspace: office suite of software, document storage and email.
- Atlassian product development tracking.
- Serviced office space: Working From (UK), AWFIS (IN), Idea Spaces (PT)

### Our Commitment

Studio Graphene has a zero-tolerance approach to modern slavery and human trafficking. We are committed to ensuring that slavery and forced labour have no place in our business or supply chains. We uphold the principles of freedom, equality, and human rights and require all suppliers, contractors, and business partners working with us to share this commitment.

### Compliance with Laws and Regulations

We adhere to all applicable laws and regulations related to slavery, forced labour, and human trafficking in the jurisdictions where we operate. This includes compliance with the Modern Slavery Act 2015 in the United Kingdom and other relevant legislation in different countries.

### Risk Assessment and Due Diligence

We conduct regular risk assessments to identify and evaluate the potential risks of slavery, forced labour, and human trafficking within our operations and supply chains. This includes:

- **Supplier Evaluation:** Implementing due diligence procedures to assess and select suppliers based on their commitment to human rights, ethical practices, and compliance with anti-slavery regulations.
- **Contractual Obligations:** Incorporating anti-slavery clauses in contracts and agreements whenever applicable with suppliers, contractors, and business partners and employment contracts explicitly prohibiting slavery and human trafficking.
- **Monitoring and Auditing:** Conducting periodic monitoring and audits to ensure compliance with our anti-slavery policies and identify any potential violations or risks.

### Recruitment and Employment Practices

Studio Graphene maintains fair, transparent, and ethical recruitment and employment practices across all geographies in which it operates. All workers are treated with respect and dignity. Our practices include:

- **Non-discriminatory hiring:** All recruitment decisions are made without discrimination on the basis of age, gender, race, religion, or nationality.
- **Worker rights:** Studio Graphene ensures fair wages, safe working conditions, reasonable working hours, and freedom of association for all workers.
- **Supply chain transparency:** Studio Graphene promotes responsible sourcing practices across its supply chain to ensure that no forced labour or exploitative practices are present at any tier.

### Training

Studio Graphene provides anti-slavery awareness training to staff in their roles. Training covers recognition of modern slavery indicators, reporting obligations and the steps to take when a concern is identified.

### Key Performance Indicators

We measure the effectiveness of our actions through the following KPIs:

- **Supplier audits completed:** number of suppliers assessed against our anti-slavery criteria per year.
- **Training completion rate:** percentage of employees who have completed training.
- **Incidents reported:** number of suspected or confirmed modern slavery incidents reported and investigated during the year.

### Continuous Improvement


Studio Graphene reviews this statement and the underlying policies annually to ensure they remain effective and reflect evolving best practice. Progress against our KPIs is reported to the Board each year.

### Non-Compliance

Any supplier, contractor, or business partner found to be in breach of this statement's principles will have their relationship with Studio Graphene reviewed. Studio Graphene reserves the right to terminate contracts where breaches of these standards are identified.

### Declaration and Sign Off

This statement has been approved by the Board of Directors of Studio Graphene and will be reviewed and updated annually.

	Signed by:  526B9B28DDAD427...
<b>Signed</b>	
<b>Name</b>	Ritam Gandhi
<b>Position</b>	Founder and Director
<b>On behalf of</b>	Studio Graphene Limited
<b>Date</b>	28-Apr-2026   16:03 BST