



MODERN SLAVERY POLICY

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to Uncommon Creative Studio Holding Limited ("Uncommon") and each of its subsidiaries. We are committed to improving our practices to combat modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we are undertaking during our 2025 financial year.

ABOUT UNCOMMON

Uncommon was founded in 2017 and is a global provider of creative services in the advertising sector. It comprises of several agencies across offices in London, New York and Sweden. The Uncommon Group is part of the wider Havas Group and its ultimate parent company is Havas UK Limited, which has its head office in England. You can find out more about our business in our [Annual Report and Accounts](#).

OUR COMMITMENT

We are fully committed within the Uncommon Group to monitoring and improving our practices to combat slavery and human trafficking in our business and supply chain. Modern slavery and human trafficking encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. It is a violation of fundamental human rights, and we strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We aim to have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

- This Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and aims to ensure modern slavery and human trafficking is not taking place anywhere in our supply chain. It highlights: (i) that modern slavery can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain; and (ii) that we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings.
- To aid in our efforts in tackling modern slavery: (a) our Uncommon London operation is a London Living Wage employer and as such exceeds minimum basic wages and benefits; (b) we do not allow for any forced or compulsory labour in any form, including bonded, trafficked or prison labour. Staff are not required to lodge 'deposits' or their identity papers with Uncommon; (c) we respect, and do not interfere with, the right of staff to form or join trade unions and to engage in collective bargaining; (d) working hours of staff comply with national laws and benchmark industry standards, whichever affords greater protection – Overtime is



always voluntary; and (e) employment must be on the basis of a recognised employment contract with Uncommon.

- We also have a company-wide whistleblowing policy to protect whistleblowers who come forward with any information related to modern slavery and human trafficking. The aim of the whistleblowing policy is to provide an internal mechanism for reporting, investigation and remedying any wrongdoing in the workplace. Protection is always provided to those staff members who disclose concerns around modern slavery and human trafficking.

SUPPLY CHAIN

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

- Our supply chain comprises a variety of suppliers. We ensure that we engage with reputable and trusted suppliers across a multitude of services which include:
 - IT
 - Production
 - Travel
 - Legal and Accounting
 - Design
 - Creative

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

- When engaging with suppliers we expect such supplier to agree, at a minimum, that:
 - it upholds all basic human rights within its influence.
 - it is not linked to an oppressive regime or any business involved in the manufacture or transfers of armaments to oppressive regimes.
 - it does not use prison labour, forced labour or child labour and complies with all applicable employment and health and safety laws.
 - it does not discriminate on any basis in its hiring and employment practices.
 - no harsh or inhumane treatment is allowed.
 - working hours are not excessive.
 - working conditions are safe and hygienic.
 - it is responsible for ensuring that any permitted subcontractors comply with the above obligations.



- As part of updates to our 2025 supplier onboarding process, all new suppliers will be required to accept Uncommon's Supplier Code of Conduct. Acceptance will be done via an online form which will then capture each supplier's acceptance of the Code of Conduct in one centralised database.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Human resources.
- Finance.
- Operations.

These departments report directly to the Founders of Uncommon.

TRAINING

- At Uncommon we have implemented a Learning Management System ("LMS") which allows us to filter specific training to our staff.
- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we have ensured Modern Slavery awareness training forms part of the LMS for 2025.

This statement applies to our 2025 financial year.

Natalie Graeme
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Natalie Graeme

Founder