Docusign Envelope ID: 28D89507-F218-8207-806C-FF439D6D8B6E

Modern Slavery and Human Trafficking Statement

Introduction

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Marketing VF Limited (“MVF ‘’ / “we”/ “our”) for the financial year ending 31st March 2025 to prevent modern slavery and human trafficking in its own business operations and supply chains.

This is the 7th statement published by MVF, a business formed in July 2009.

1. Organisation Structure and Supply Chain

MVF is a digital marketing business focused on customer acquisition. We have offices in London, Austin, and the Netherlands, as well as employees working remotely across the US and other locations.

We work with clients across several international markets.

Our main areas of procurement are digital marketing services, technology and IT, and other office-related services, with many of these services provided by established global l suppliers.

Countries of Operation and Supply Chain

We adopt a risk-based approach to supplier assessment. Due to the nature of our business, centered on marketing spend and the profile of our suppliers, who are established industry leaders, our modern slavery risk is considered low. This assessment also considers the geographic locations of our supply chains, which are primarily in the UK and Ireland.

This aligns with the Global Slavery Index, which highlights that countries with the highest prevalence of modern slavery are often conflict-affected, subject to state-imposed forced labour, or have weak governance. These factors are largely absent in the regions where we operate and source supplies.

2. Policies concerning Modern Slavery

Our policies demonstrate our commitment to ethical conduct and integrity in all business relationships. Key policies include:

- Annual Modern Slavery Statement (publicly available)
- Internal Anti-Modern Slavery Policy
- Whistleblowing Policy and Procedure
- Environmental, Social, and Governance Policy
- Grievance Policy
- Risk Management Framework

Docusign Envelope ID: 28D89507-F218-8207-806C-FF439D6D8B6E

3. Due Diligence Processes

MVF conducts due diligence when engaging new suppliers to ensure compliance standards, including those relating to Modern Slavery. Our process focuses on key areas such as:

- Forced Labour: Verifying that suppliers have measures in place to prevent any form of modern slavery.
- Information Security: Assessing suppliers' adherence to data protection and cybersecurity practices.
- Data Protection: Ensuring compliance with relevant privacy regulations.

As part of the onboarding process, we ask all suppliers, regardless of location, to complete our due diligence questionnaire. The first section specifically addresses modern slavery compliance, reflecting our commitment to ethical practices even where local regulations may differ from UK disclosure requirements.

4. Risk Assessment and Management

Our Risk Management Framework provides a structured approach to identifying and managing risks across our business.

Modern slavery is assessed as a low-risk area within our operations based on the controls we have in place, including:

- **Policies and Procedures**: Providing clear and accessible guidelines for employees to raise concerns confidentially. A refresh of our employee intranet is expected in December 2024.
- **Employee Recruitment and Onboarding**: Conducting right-to-work checks and bank account verification as part of our hiring process to comply with employment laws and reduce the risk of exploitative practices.
- **Supplier Due Diligence**: Requiring supplier due diligence to be completed during supplier onboarding to assess compliance, including adherence to modern slavery requirements.
- **Monitoring High-Risk Jurisdictions**: Assessing regions with a higher prevalence of financial crime risk (including modern slavery) to identify potential issues.
- **Visits to External Outsourced Partners**: Periodic site visits to our outsourced call center to confirm that they meet our expectations and comply with agreed standards.
- **Zero Tolerance to Discrimination**: Upholding policies and practices that foster a fair and inclusive workplace.

Risks are reviewed on an ongoing basis, with senior management conducting a formal review quarterly. This ensures our processes remain effective and responsive to any emerging risks.

Docusign Envelope ID: 28D89507-F218-8207-806C-FF439D6D8B6E

5. Key performance indicators to measure the effectiveness of steps being taken

We have not introduced specific modern slavery KPIs during the reporting period. We continue to monitor this area through our existing compliance, risk management and people processes.

However, we can confirm the following progress:

- No modern slavery-related incidents or concerns have been reported via our feedback or reporting channels.
- No additional material modern slavery risks were identified through our existing risk management processes.
- Right-to-work compliance for new employees continues to be monitored as part of our onboarding processes.

6. Training

We provide staff training through a combination of in-person sessions and e-learning. While we do not currently have a standalone modern slavery training module, employees receive training on related areas including anti-money laundering, conduct, fraud prevention and data privacy. These programmes support employees in recognising and escalating compliance, ethical and risk-related concerns, including issues that may be relevant to modern slavery and exploitation.

Board Approval

This statement has been approved by the Board of Directors and signed on their behalf by Dave Thal in his role as CEO for Marketing VF Limited:

David Thal

Dave Thal
CEO, Marketing VF Limited
Date: October 19, 2026