

UK Modern Slavery Act Statement

IKM is firmly committed to acting with the highest ethical standards and integrity in all aspects of our business. Modern slavery is a heinous crime and a violation of fundamental human rights. It is our policy to ensure that there is no modern slavery or human trafficking in any of our business operations and our supply chains. We strive to promote and maintain a safe and fair workplace for all employees, contractors and suppliers, and we expect our partners to uphold the same values.

IKM partners with individual subject matter experts, as well as a variety of small and medium size suppliers for most business requirements such as content development and technology infrastructure. We have implemented a comprehensive due diligence process to ensure that our supply chain is free from any form of slavery and human trafficking, and we regularly monitor and assess the compliance of our suppliers with our standards. To date, IKM has never been made aware of any slavery or human trafficking activities involving ourselves, or any companies in our supply chain. If we become aware of any such activity or incident, we will take prompt action in accordance with our legal obligations and our moral and ethical commitment to respect human dignity and rights.

We consider the risk of modern slavery or human trafficking within our business and our supply chain to be very low due to the nature of the work IKM does, the services we provide and consume, and our general activities in our business. We require our suppliers to agree to a code of conduct expressly prohibiting human trafficking or slavery of any kind. In addition, we strive to strengthen our supplier review process in each engagement including contract provisions that prohibit any form of modern slavery.

IKM has a set of internal policies to help ensure that we are conducting business in an ethical and transparent manner, including:

- Recruitment Policy: IKM maintains robust recruitment policies, including conducting eligibility to work in the UK (or in whichever region a person will be employed) and to confirm against human trafficking or individuals being forced to work against their will or for other's benefit. IKM uses internal personnel to source candidates and, when we rely on external agencies, we verify the agency's practices before accepting any candidates from the agency.
- Whistleblowing Policy: IKM maintains a whistleblowing policy to ensure that all employees are
 informed that they can raise any concerns about how co-workers are being treated (within the
 practices of the organization) and without fear of retribution or reprisal.
- <u>Code of Conduct</u>: IKM has a global code of conduct that clearly states our policies and expectations of all employees, as to how we conduct ourselves with each other and our standards of respect. Each employee certifies that they will adhere to the code of conduct every year as part of our compliance program.

Moreover, we are committed to preventing corruption in all its forms and promoting transparency and ethical conduct in all our business dealings. We have established clear policies and procedures to



prevent corruption, bribery, and other unethical practices, and we require our employees, contractors and suppliers to comply with these policies at all times.

We are dedicated to creating a sustainable and responsible business model and strive to promote the highest standards of human rights and integrity. By working together with our partners and stakeholders, we aim to make a positive impact on society and contribute to a better future for all.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for year ending *December 31, 2024.*

Jordy Spiegel

CEO & Co-Chairman

room Sorgel