



**NEXT 15 GROUP PLC
(‘Next 15’ or the ‘Company’ or the ‘Group’)**

**SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 31
JANUARY 2023, APPROVED BY THE BOARD OF DIRECTORS ON 20 APRIL 2023**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (‘Act’) and is the slavery and human trafficking statement for the financial year ended 31 January 2023 for Next 15, inclusive of relevant subsidiaries of Next 15 to which the Act applies.

The Board of directors of the Company has, at a properly convened meeting, viewed and approved this statement, and delegated authority to sign it on their behalf to the Chief Financial Officer of the Group.

INTRODUCTION

Next 15 recognises the importance of combating slavery and human trafficking. We do not tolerate modern slavery or human trafficking in our organisation or in our supply chain. This statement sets out the steps that Next 15 is committed to taking across the Group to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place.

For the purposes of this statement, slavery and human trafficking are based on the definitions set out in the Act.

OUR BUSINESS

Next 15, together with its subsidiaries, is a data and technology-led marketing group comprised of 25 marketing businesses, spanning digital content, PR, consumer, technology, marketing software, market research, public affairs and policy communications. Headquartered in London, and listed on AIM, the Group has over 4,079 employees and operations in 15 countries operating primarily in the US and UK. The Group reported global turnover for the year ended 31 January 2023 of £627.5million.

When carrying out due diligence for new businesses we acquire, we carry out detailed due diligence which includes analysis to ensure they meet our minimum standards of compliance with the values and standards set out in this document

OUR SUPPLY CHAINS

Given the nature of our businesses, we do not have an extensive supply chain network. Our supply chains include (but are not limited to): marketing consultants, information technology providers (software and hardware) and software developers, professional services, insurance and benefits providers, recruitment agencies, cleaning and catering services, office facilities and maintenance service providers, and advertising production, market research and other marketing services providers. **During the year to 31 January 2023, we were not made aware of, nor did we discover, any issues relating to modern slavery in our supply chain.**

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Group does not operate in an industry where modern slavery is prevalent, but we acknowledge that we operate (by either having offices or clients or suppliers) in countries where modern slavery exists. Our internal Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

RISK ASSESSMENT AND DUE DILIGENCE PROCESSES

We continue to view our industry and the majority of our suppliers as low-risk. Where any higher-risk areas are identified, we will seek to mitigate the risk of modern slavery occurring by building a more detailed review of potentially high-risk suppliers into our internal audit process by:

- gathering further information of the potentially high-risk services;
- obtaining relevant contractual terms; and
- holding discussions with the relevant Group company to see the steps taken by them in vetting the supplier, for example whether they have visited the supplier offices or have any other reasons for concern.

Due diligence on operating subsidiaries' suppliers is the responsibility of the relevant operating subsidiary, within the framework and policy set at Group level. Operating subsidiaries are required to report at least once each year on their top five suppliers as well as any other suppliers they have identified as being potentially high risk.

During the year to 31 January 2023, we followed a supplier approval process, when onboarding suppliers, to obtain detailed information about them and their processes to ensure that we work with suppliers who do not tolerate unethical behaviours, pay a living wage and have appropriate diversity of ownership. Before entering into a contract with a new supplier it must confirm it meets certain minimum standards that we expect of them. This process is being enhanced and expanded during 2023.

For the more complex ethical issues arising from the risk assessments and due diligence activities conducted by the Company, the Company created an Ethics Group to be convened on an ad-hoc basis to discuss these matters in detail. The Ethics Group will assist the business in making values-driven decisions by paying particular attention to the ethical standards of the businesses we work with, their supply chains, and how they align with our own expectations.

We have continued to build upon the risk assessment, due diligence and mitigation process set out above in FY23 by undertaking a more detailed review of its effectiveness through our internal audit function due to complete in FY24, which will include developing key performance indicators to, where possible, measure our effectiveness year-on-year.

RESPONSIBILITY FOR COMPLIANCE

The responsibility for all necessary activities to ensure Next 15's compliance with the values and standards set out in this statement will be co-ordinated across the Group's legal, human resources, finance, procurement, company secretarial and internal audit functions, in conjunction with relevant personnel at our operating subsidiaries.

RECRUITMENT

We are an equal opportunities employer and pay a fair living wage in all jurisdictions that we operate in. All contracts of employment are drafted in accordance with the highest standards of local law and are compliant with human rights standards. HR specific software has improved the monitoring and reporting capabilities of the Group, therefore increasing oversight. We are confident that there is no risk of slavery or human trafficking in the employment or engagement of employees across the Group, but we remain vigilant.

TRAINING AND AWARENESS

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are committed to:

- providing appropriate training to relevant staff, including through induction programmes, the introduction of a new intra-Group e-learning platform and communication of the Group's Modern Slavery Policy; and

- communicating our zero-tolerance approach to modern slavery to relevant suppliers, contractors, and business partners at the outset of our business relationship with them, and where appropriate thereafter.

Group employees have access to an externally hosted confidential whistleblowing process for raising concerns. We are also renewing our internal training in 2023 to ensure that we have appropriate levels of awareness among employees of issues related to slavery and human trafficking including ensuring the mechanisms available to our workforce are sufficiently known about, trusted and accessible. Our processes will always protect individuals who come forward from being victimised further and provide access to counselling and support.

FURTHER STEPS

We will review the effectiveness of the steps we are taking to ensure that there is no slavery or human trafficking in our supply chains and that any new mechanisms employed are adequate and fit for purpose. Following the improvements that we have committed to this year, we aim to monitor and, where necessary, improve our policies, procedures and systems on a continual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 January 2023.

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 6/8/2023
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Peter Harris
Chief Financial Officer
Next 15 Group plc