# TEAM LEWIS

# PREVENTION OF MODERN SLAVERY STATEMENT

This statement has been published by LEWIS Communications (Holdings) Ltd ("TEAM LEWIS") pursuant to section 54(1) of the United Kingdom's Modern Slavery Act 2015 and outlines the actions we are taking to ensure neither Modern Slavery nor Human Trafficking is taking place within our business and supply chains.

#### 1. TEAM LEWIS' business activities

TEAM LEWIS is the holding company of a group of companies providing global PR, digital marketing and communications services. Further details regarding TEAM LEWIS and its services are available at <a href="https://www.teamlewis.com">www.teamlewis.com</a>.

TEAM LEWIS is active in EMEA, US and APAC and employs around 600 qualified and skilled people. Upon evaluation, TEAM LEWIS does not believe it is at risk of modern slavery occurring within its business.

#### 2. Modern Slavery and other policies

TEAM LEWIS has adopted a comprehensive Code of Conduct with key commitments, including those against modern slavery, which apply to its employees, clients and suppliers. TEAM LEWIS believes this Code of Conduct is not only a clear testimony of TEAM LEWIS' endeavours in combatting and eliminating modern slavery practices but also ensures it observes a minimum threshold vis-à-vis its clients and its supply chain.

In addition to this, TEAM LEWIS operates a range of separate internal policies to ensure it conducts business in an ethical and transparent manner. These policies are reviewed on an annual basis and updated where necessary. All employees and directors are required to comply with internal company policies, including Anti Bribery and Anti-Corruption policies, as well as its Human Resources policies on recruitment, equal opportunities, bullying and harassment, health and safety and diversity. Central to this is TEAM LEWIS' clear whistleblowing policy which has been put in place to report any wrongdoing. TEAM LEWIS continues to comply with applicable employment law relating to employee terms and conditions, including pay.

#### 3. TEAM LEWIS' supply chains and due diligence

Due to the nature of its services, TEAM LEWIS maintains a relatively limited supply chain, which has remained largely consistent over the years. Its supply chains include property landlords and associated property services, professional services (including cleaning and catering) and IT services.

TEAM LEWIS maintains a risk-based approach with regards to the onboarding of clients and suppliers on the basis of the location they operate in and/or the goods and/or services they provide. To the extent warranted, TEAM LEWIS may conduct more in-depth assessments with regards to its client and suppliers if -in its reasonable opinion- such parties are deemed to be of high risk. Actions that have been undertaken so far, have included: checking public information on the relevant party's corporate governance structure and if not available, reaching out to the client or supplier for further information. TEAM LEWIS has also developed a clear KYC checklist which is used when onboarding new clients and suppliers. TEAM LEWIS further ensures that any contractual mechanisms are enforced where needed (including but

not limited to the right to immediately terminate a contract in the event of non-compliance with applicable anti-slavery laws).

## 4. Training

TEAM LEWIS is committed to identifying and addressing the risks in both its organisation and supply chain and educates its employees about the risks accordingly. In doing so, it has invested in an external training programme on Modern Slavery for its employees.

### 5. Combatting Modern Slavery

No incidents of Modern Slavery have been notified or identified during the period covered by this statement.

#### 6. Further actions

Through TEAM LEWIS Foundation, TEAM LEWIS continues to invest heavily in its employee-led charity initiative, providing both financial and non-financial support to charities dedicated to social causes.

#### **Approval**

This statement was considered and approved by the Board of Directors of TEAM LEWIS on 11<sup>th</sup> June 2025.

Signature:

Date: 11<sup>th</sup> June 2025 Name: Chris Lewis