

1. Introduction

This policy outlines Mango Direct Marketing Ltd.'s ("Mango") commitment to preventing modern slavery and human trafficking within our organisation and throughout our supply chains. Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve the exploitation of individuals for personal or commercial gain.

Mango also recognises its obligations under wider employment law, whistleblowing protections, equality legislation, procurement standards and human rights principles including the Human Rights Act 1998 and the principles of the United Nations where relevant.

This policy applies to all individuals working for or on behalf of Mango in any capacity, including employees, directors, officers, agency workers, seconded staff, volunteers, agents, contractors, suppliers, and third-party business partners.

This policy should be read alongside Mango's Whistleblowing Policy, Equality Policy, Recruitment Policy, Supplier onboarding processes, Anti-Bribery & Corruption Policy and Corporate Social Responsibility Policy.

Our Organisation and Structure

Mango is a customer communications and contact centre solutions provider, offering inbound and outbound call handling, digital engagement, and marketing support services. Our operations are based in Northern Ireland, serving clients across the UK and Ireland.

Our supply chains primarily include technology providers, telecoms partners, professional services, facilities services, and recruitment agencies. While Mango operates in a lower direct-risk sector, we recognise that modern slavery risks can still arise indirectly through recruitment practices and supply chains.

Our Commitment

Mango has a zero-tolerance approach to modern slavery and human trafficking. We are committed to:

- Maintaining robust systems and controls to prevent modern slavery in our operations and supply chains.
- Fostering a culture of transparency, accountability, and ethical conduct.
- Working collaboratively with suppliers and partners to meet and uphold these standards.

2. Commitments

Mango is an Equal Opportunities Employer. Management is committed to ensuring fairness, equality, and respect across the organisation. Our approach to social responsibility includes:

- Promoting openness, transparency, and accountability in our business and supply chains.
- Embedding ethical conduct and respect for human rights in our operations and strategic decision-making.
- Responding actively to societal, client, and regulatory expectations around labour rights.

Policy Commitments

We expect everyone working with or on behalf of Mango to support our commitments to prevent modern slavery:

- Zero-tolerance towards slavery and human trafficking.
- Shared responsibility across the organisation to prevent, detect, and report concerns.
- Active supplier engagement to identify and mitigate risks.

Due Diligence and Supplier Controls

Our risk-based approach to procurement and supply chain management includes:

- Assessing suppliers prior to engagement based on factors such as location, industry, and known labour-rights exposure.
- Including anti-slavery and human-trafficking clauses in supplier contracts where appropriate.
- Requiring suppliers to comply with Mango's Supplier Code of Conduct, which sets out expectations regarding labour standards, human rights, and workforce protections.
- Requesting recruitment agencies and labour providers to confirm compliance with ethical employment standards, including evidence that workers are not charged recruitment fees.
- Requiring suppliers using subcontractors to ensure full compliance across their own supply chains.
- Conducting periodic due diligence and, where risk is identified, undertaking enhanced checks such as audits or site assessments.

- Developing remediation action plans where issues are identified, prioritising the safety, protection, and welfare of affected individuals.
- Retaining the right to suspend or terminate business relationships where suppliers fail to demonstrate adequate and timely remediation.

Mango ensures all employees are employed voluntarily, have clear contracts of employment, receive lawful pay, maintain the right to leave employment and are never required to surrender personal documentation as a condition of employment.

Mango continues to improve visibility of its wider supply chain through supplier mapping and ongoing risk review where proportionate to the size and complexity of the supplier relationship.

3. Risk Assessment and Management

Mango conducts ongoing assessments to identify areas of potential modern slavery risk in our business and supply chains. These include:

Risk Areas

- Recruitment and labour provision, particularly when using external agencies.
- Technology and equipment supply chains, which may involve international components sourced from higher-risk regions.
- Facilities and maintenance services, which globally are recognised as higher-risk sectors.

Mango also monitors operational indicators that may suggest worker exploitation, including unusual payroll arrangements, withheld documentation, excessive overtime concerns, worker intimidation, restricted movement or third-party complaints.

Risk Mitigation Measures

- Conducting supplier risk categorisation based on sector, geography, and nature of the goods or services.
- Requiring suppliers in higher-risk categories to provide additional assurance, such as certifications, audits, or evidence of their own modern slavery controls.
- Monitoring changes within supply chains (e.g., new subcontractors, changes in ownership or location).
- Providing staff training to ensure awareness and enable early detection of risk indicators. Providing onboarding training and periodic refresher training for relevant employees involved in recruitment, procurement, supplier management and operational leadership roles.

3. Effectiveness and Performance Indicators

To ensure that Mango is effectively preventing modern slavery, we review our performance against internal indicators, such as:

- Percentage of new suppliers undergoing modern slavery risk assessment.
- Number of suppliers required to provide enhanced due diligence and evidence of compliance.
- Number of modern-slavery-related concerns raised and resolved through reporting channels.
- Completion rates of staff training on modern slavery awareness.
- Audit results for suppliers within higher-risk categories.
- Progress against remediation plans where issues have been identified.

These indicators help us evaluate and continuously improve the effectiveness of our approach.

Performance outcomes and emerging risks may also be reviewed as part of annual management review processes.

5. Responsibilities for Policy and Compliance

Board of Directors: Holds overall accountability for Mango's anti-slavery governance and policy compliance.

HR Department: HR leads employee-related implementation, while Procurement, Senior Leadership and Operational Management share responsibility for supplier due diligence and risk oversight.

Managers and Supervisors: Responsible for ensuring team awareness and adherence to the policy.

All Staff and Representatives: Required to comply with this policy and to report any suspicions or concerns.

6. Reporting Modern Slavery

All employees, contractors, suppliers, and partners must report known or suspected incidents of modern slavery immediately.

Reporting Channels

- **Employees:** Report concerns to your line manager or directly to the HR Team.
- **Suppliers/Contractors:** Report concerns to your Mango contract manager or account contact.

Concerns may also be raised through Mango's confidential Whistleblowing process where individuals do not feel comfortable reporting concerns through normal management channels.

Reports will be handled confidentially. Mango guarantees that no individual will experience retaliation or disadvantage for raising a concern in good faith.

Where appropriate, concerns may also be escalated to external bodies including:

- Modern Slavery Helpline
- Police Service of Northern Ireland
- Gangmasters and Labour Abuse Authority
- Relevant law enforcement authorities in the Republic of Ireland where applicable

7. Breaches of this Policy

Employees found to be in breach of this policy may face disciplinary action, up to and including dismissal.

Mango may suspend or terminate relationships with suppliers or partners who fail to comply.

Where possible, Mango may support corrective action plans before considering termination, prioritising remediation over disengagement.

8. Policy Review and Updates

This policy will be reviewed at least annually, or sooner if legal or regulatory changes occur. Updates will take into account:

- Amendments to the **Modern Slavery Act 2015**
- Government responses and statutory guidance
- Recommendations from independent anti-slavery bodies and commissioners
- Industry best practice and emerging due diligence requirements
- Strategic priorities of the **Independent Anti-Slavery Commissioner (2024–2026)**

Responsibility for review lies with the HR Department, with input from Compliance and the Board as needed.

**** It is the responsibility of the user to verify that this copy is the latest version****