



MODERN SLAVERY POLICY

VERSION	DATE	AUTHOR	COMMENTS
1.0	December 2021	Hooligan Executive Team	Approved
1.1	January 2022	HR Manager	Approved
1.2	July 2024	HR Manager	Approved

1. INTRODUCTION

This statement is published on behalf of Hooligan Development pursuant to section 54 of the UK Modern Slavery Act 2015 (the “Act”) and constitutes Hooligan’s Modern Slavery and Human Trafficking Statement, as required by the Act. We are committed to addressing the requirements of the Act and ensuring that our supply chain is compliant with the regulations prescribed therein. We acknowledge the undertakings in the Act and endeavor to create a culture of transparency with regards to the supply of goods and services to us.

2. SLAVERY AND HUMAN TRAFFICKING STATEMENT

At HooliganDevelopment we conduct our business ethically and with integrity. We behave responsibly and pay fair remuneration for work done. We are committed to:

- the prevention of modern slavery, in all its forms, both in our business and in our supply chains as part of maintaining our reputation and the confidence of our investors and business partners;
- enforcing effective systems and controls designed to address the risk of slavery and human trafficking; and
- acquiring goods and services without causing harm to others.

We will not do business with suppliers involved in any form of slavery. If you have any concerns or suspicions that we should know about, please contact our Chief Risk Officer on info@hooligan.co.za.

3. OUR BUSINESS AND SUPPLY CHAIN

Hooligan Development is a dedicated, active South Africa-based digital development house, offering a range of digital development services to clients in SA, the UK, Europe, the US and the rest of the world. Our clients include large, medium and small sized enterprises, as well as individuals.

Our offices are based in Johannesburg, South Africa. Further information about our business can be found on our website.

Our principal third-party suppliers are professional services firms providing services to enable us to deliver digital development services to our clients. We also engage with businesses that supply services related to the running of our premises, IT and technology, and stationery and supplies. While we consider the risk of slavery or human trafficking occurring within our business or supply chain to be low, we recognise that particular types of suppliers (e.g., those employing lower-wage staff) are likely to present a higher risk of slavery and human trafficking.

4. COMPLIANCE

Since the Act came into force, we have built on our existing compliance framework by:

- assessing the risk of modern slavery in our business and our supply chains;
- assessing our approach to such risk;
- holding internal discussions on the matter;
- developing an Anti-slavery Policy (to be approved by the firm's Risk and Compliance Committee on an annual basis); and
- identifying standards (set out below) against which to assess our progress on slavery and human trafficking issues.

Our Anti-slavery Policy reflects our commitment to conducting business ethically and with integrity and to enforcing systems and controls designed to ensure slavery and human trafficking is not taking place in our business or in our supply chains. This Policy applies to all staff and to our suppliers.

Our Anti-slavery Policy builds on the company's existing policies covering equal opportunity and diversity, conduct of business, grievances and whistleblowing.

5. DUE DILIGENCE IN OUR SUPPLY CHAINS

The Company expects its suppliers to adopt the same high standards that we adhere to and to have robust employment practices. We have considered the risk of modern slavery in our supply chains based on a number of relevant factors. We have taken a risk-based approach and, in relation to suppliers that we have identified as higher risk, will inform them of our commitment to complying with the requirements of the Act and our responsibility to ensure, as far as possible, that slavery and human trafficking is not occurring in any part of our supply chains. These requirements are embedded in our Procurement Policy.

6. TRAINING

All members of staff (including newcomers) are given a staff handbook containing our Anti-slavery Policy. In addition, online training on modern slavery and human trafficking is provided to all staff on a biennial basis.

7. STANDARDS

The following standards will be used to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- all staff have been provided with our Anti-slavery policy;
- any cases of suspected slavery/trafficking breaches should be reported to the Chief Risk Officer or in accordance with our Whistleblowing policy within a reasonable time of occurring;
- any cases of suspected slavery/trafficking are assessed within a reasonable time of being reported and further investigations concluded as soon as possible thereafter; and
- staff successfully completing online training.

8. FUTURE STEPS

We will continue to monitor the effectiveness of our processes and procedures to prevent modern slavery and human trafficking in our business and our supply chains, and take necessary steps to ensure that they remain appropriate. Over the course of the next year, we intend to take the following actions to build on the steps taken so far:

- further develop our anti-slavery risk assessment framework to provide ongoing information and assurance to our senior management team;
- continue to keep our procurement and outsourcing policies and processes under review;
- further embedding consideration of modern slavery and human trafficking in the ongoing oversight of our suppliers; and
- assess the impact of modern slavery and human trafficking as our business expands outside the UK.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and will be reviewed annually and made available on our website.