84 Commercial Street, Edinburgh, Scotland, EH6 6LX
t 0131 237 2377 e info@d2collective.com w d2collective.com

1. Purpose of this statement

This purpose of this statement is to set out the approach of D2 Collective to eliminating modern slavery, human trafficking, forced labour and labour rights violations from our business activities and supply chain for the financial year ending 31 July 2026.

It has been prepared by Damian Towers and approved by Louise Towers in accordance with the roles and responsibilities set out below.

Under the Modern Slavery Act 2015, an organisation must publish an annual modern slavery statement on its website if it:

- is a commercial organisation that supplies goods or services, and
- carries out its business (or part of its business) in the UK, and
- has a total annual worldwide turnover of £36 million or more

The above criteria do not apply to D2 Collective. We are not required to publish an annual modern statement, but we choose to do so.

2. Roles and responsibilities

At D2 Collective
Damian Towers is responsible for preparing an annual modern slavery statement
Louise Towers (who is a Director of D2 Collective) is responsible for approving this statement annually
Damian Towers is the designated internal contact for employees who think they have spotted an instance of modern slavery, or have a question about modern slavery

3. Definition of 'modern slavery'

Modern slavery is the severe exploitation of someone for commercial gain. It can include:

- human trafficking – where someone facilitates or arranges the transport of another person for exploitation
- forced labour – where someone is forced to work through coercion (threats)
- serfdom – where someone is forced to work through coercion and lives on another's property
- bonded labour – where someone in poverty borrows money and is forced to work to pay off the debt
- descent-based slavery – where slavery is 'passed down' through a family line
- forced and early marriage – where someone is married against their will or is too young to consent to the marriage

4. Preventing modern slavery

We will ensure that modern slavery does not form part of our business operations by:

- carrying out a risk assessment to identify areas most at risk of modern slavery, and identify measures we can put in place to remove and reduce risks
- where necessary, working with experts to identify steps we can take to reduce the risk of modern slavery

84 Commercial Street, Edinburgh, Scotland, EH6 6LX
t 0131 237 2377 e info@d2collective.com w d2collective.com

We will ensure that modern slavery does not form part of our supply chain by carrying out due diligence on suppliers before entering into contracts with them.

Contracts with suppliers will state that:

- suppliers' performance with regards to modern slavery will be monitored alongside other parts of the contract
- suppliers are expected to monitor their own supply chains and report any breaches of the Modern Slavery Act 2015
- suppliers are not permitted to subcontract without our consent
- if an instance of modern slavery is identified and not rectified to our satisfaction, we can terminate the contract with the supplier at no penalty to us

5. If there is an instance of modern slavery

5.1 Immediate response
If an employee spots any instance of modern slavery, they should report it to the police immediately. If the situation is not an emergency, they can call the police on 101. If there is a risk of immediate danger, they should call 999.

5.2 If the instance is within our organisation
If an instance of modern slavery is found within our organisation, senior leaders will be informed immediately, and a senior person appointed to oversee all measures necessary to rectify the situation. Steps needed may include:

- changing processes and policies
- providing more training to all employees
- reporting individuals who have breached the Modern Slavery Act 2015 to the appropriate authority
- where an employee has fallen short of the expectations of this policy, taking action in line with our company capability or disciplinary procedures

5.3 If the instance is within our supply chain
If an instance of modern slavery is found within our supply chain, employees should notify Damian Towers who will decide appropriate action. This may include:

- offering advice to the supplier on steps they can take to eradicate modern slavery
- setting a deadline by which changes must be made
- terminating the contract with the supplier

5.4 If the instance is outside of the UK
If modern slavery is identified outside of the UK, the appropriate response will depend on the local circumstances. For example, we may need to work with:

- non-governmental organisations (NGOs)
- local government and law enforcement
- industry bodies or trade union organisations

The immediate response should always be guided by what is safest for the employee and the potential victims.

84 Commercial Street, Edinburgh, Scotland, EH6 6LX
t 0131 237 2377 e info@d2collective.com w d2collective.com

6. Raising concerns

Employees are encouraged to talk to Damian Towers if they have a question about modern slavery, or if they are not sure something they have seen counts as modern slavery.

The Modern Slavery Helpline can also provide advice. Their number is 08000 121 700.

7. Impact on employees

An employee will face no negative consequences for:

- alerting the appropriate authority and/or senior leaders to an instance of modern slavery
- raising concerns about our business practices
- seeking advice from an outside party about modern slavery
- asking questions about modern slavery

If an employee feels they have suffered a detriment for any of the above, we encourage them to raise this using our company grievance procedure or our whistleblowing procedure.

8. Employee training

Employees are trained in preventing modern slavery and the contents of this policy as part of their induction. This training is refreshed as periodically.

9. Key performance indicators (KPIs)

This policy's KPIs are:

- due diligence is completed on all suppliers before a contract is signed with them
- all employees receive training on modern slavery

10. Publishing this statement

Our modern slavery statement is published on our company website.
A copy can also be requested by emailing damian@d2collective.com