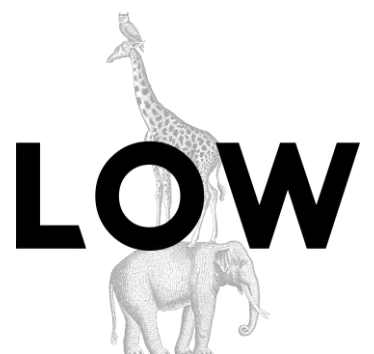

LOW

Slavery and Human Trafficking Statement

Date — February 2021



OBJECTIVE

As required by the [UK Modern Slavery Act 2015](#) (the Act), this Statement describes the steps LOW Associates Limited (hereafter, LOW) has taken in 2021 to ensure that slavery and human trafficking are not taking place in any part of our organisation or supply chains.

While this Statement adheres to UK anti-slavery principles as outlined by the Act, LOW will endeavour to apply this policy to our Belgian suppliers as defined in [Article 433](#) of the Belgian Criminal Code.

ORGANISATION STRUCTURE

LOW creates and manages innovative and effective communications projects, using custom-built teams of experienced strategic thinkers. Founded in 2009, we are a private company headquartered in Brussels, with an extensive database of associates from across Europe.

SUPPLY CHAIN RELATIONSHIPS

Given the nature of the services we provide, we have a simple supply chain model built around supporting our business and maintaining our premises, systems and infrastructure. Our key suppliers include associates who work with us on specific projects, information and data services companies, paper and printing suppliers, and cleaning and security services providers.

OUR APPROACH TO COMBATTING MODERN SLAVERY

We are absolutely committed to conducting business in a responsible and ethical manner. We take a zero-tolerance approach to modern slavery, and we expect the same high standards and commitment from those we do business with. We consider the risk of modern slavery existing within our business to be low, and we have never identified any examples of modern slavery within our business or supply chain, including within the last twelve months.

We have implemented a number of internal policies and procedures with the aim of ensuring that effective systems and controls are in place to prevent slavery and human trafficking from occurring in any part of our business. We promote a culture of integrity, and have established principles for how we deal with our clients, employees and the public. These include the values and rules set out in our policies, which seek to foster a safe, healthy and productive workplace, and to maintain accountability at all levels of the organisation.

Employees are encouraged to report any compliance concerns they may have to management.

APPROVED SUPPLIER PROCESS

We always take a risk-based approach to our assessment of suppliers. As our arrangements with suppliers come up for renewal, we will endeavour to include obligations in our commercial agreements requiring suppliers (and their sub-contractors) to comply with the Act. We will also endeavour to reserve audit and termination rights in our supplier agreements, for situations in which we have reasonable evidence to suggest that a supplier is in breach of the Act.

As a demonstration of LOW's commitment to its responsibilities under the Modern Slavery Act 2015, LOW has recently incorporated the Modern Slavery Act Policy into its approved supplier process. LOW requires all suppliers to indicate that they understand and agree with the LOW Modern Slavery Act supplier list. Failure to do so may result in termination of the relationship in order to reinforce LOW's zero-tolerance approach to modern slavery.

AWARENESS AND TRAINING

We provide clear guidance to all employees regarding the high standards of professional behaviour we expect. LOW has registered with the Stronger2gether campaign which provides guidance, resources and network for employers, labour providers and their representatives to work together to reduce exploitation. Copies of these policies are given to new joiners, and we offer periodic training to our staff.

We will continue to review and update these policies and procedures annually.



Sally Low, Chief Executive Officer