

Anti-slavery policy

Version 2.2

UNICEPTA

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1 General document information

1.1 Formal information

1.2 Document attributes

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1.3 Document history

Version	Date	Author	Comment
1.0	23.05.2023	Jana Schulz	Initial version
2.0	05.08.2024	Jana Schulz	Review, Revision
2.1	18.08.2025	J. Schulz	Review
2.2	08.09.2026	J. Schulz	Review and revision: scope, legal references, risk-based measures and whistleblowing reference updated

1.4 Original place of storage

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1.5 Communication

The document is intended for internal and external use. It is to be made known to all employees of the UNICEPTA Group, as well as to all other stakeholders of the UNICEPTA GROUP.

1.6 Aim and purpose

UNICEPTA is committed to acting ethically and with integrity in all its business dealings and relationships.

UNICEPTA is committed to ensuring that the organization and its supply chain are free from modern slavery or human trafficking in any form. UNICEPTA will not knowingly enter a partnership with any individual or organization that violates these principles.

UNICEPTA expects all those who work with and for UNICEPTA to read and comply with this policy.

1.7 Scope of validity

This document applies to all employees, managers and corporate bodies of the UNICEPTA Group, as well as to suppliers, service providers, business partners and other stakeholders acting for or with UNICEPTA, to the extent relevant to their relationship with UNICEPTA.

2 Preamble

UNICEPTA is committed to combating all forms of modern slavery and human trafficking within our operations and supply chains. This policy outlines our stance, responsibilities, and actions to ensure compliance with laws and promote ethical practices that respect human dignity and freedom.

3 Definitions

Modern Slavery: Encompasses slavery, servitude, forced labor, and human trafficking.

Forced Labor: Work that is performed involuntarily and under the threat of any penalty.

Human Trafficking: The recruitment, transportation, transfer, harboring, or receipt of persons by improper means for an improper purpose, including forced labor or sexual exploitation.

4 Laws and regulations

We adhere to all relevant national and international laws and standards applicable to our operations, including but not limited to:

- The Modern Slavery Act 2015 (UK)
- The Trafficking Victims Protection Act (USA)
- The International Labour Organization (ILO) Conventions
- The UN Global Compact principles, in particular the principles relating to human rights, labour standards, the elimination of forced and compulsory labour, and the effective abolition of child labour
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, including their expectations regarding responsible business conduct, workers' rights and adequate wages in line with applicable standards

UNICEPTA is a member of the [United Nations Global Compact initiative](#) and supports its principles through its day-to-day business conduct.

This policy complements our [Global Code of Conduct](#).

5 UNICEPTA

UNICEPTA is one of the leading service providers for media intelligence. UNICEPTA covers the entire spectrum of media intelligence: from curated media reviews, editorial services and social listening to reputation analyses and strategic topic analyses. We capture what others miss — from print, social media, online and broadcast. Worldwide.

In addition to our headquarter in Cologne, we have 9 other global branches and offices: Berlin, Detroit, Krakow, London, Paris, São Paulo, Shanghai, Washington and Zurich.

As a service provider, the risk of modern slavery in our company or in our supply chain is low, but we are aware that modern slavery occurs in many different forms around the world. That is why we have decided to publish a clear statement against slavery and, of course, to act accordingly.

6 Our Commitment

Zero Tolerance: We have a zero-tolerance approach to modern slavery and human trafficking.

Ethical Practices: We endeavour that our business operations and supply chains uphold the highest ethical standards.

Continuous Improvement: We are committed to continuously improving our policies and practices to combat modern slavery.

The Management Board is responsible for compliance with this policy.

7 Measures

UNICEPTA takes a proportionate, risk-based approach to preventing modern slavery and human trafficking. In particular, UNICEPTA:

- periodically assesses potential modern slavery and human trafficking risks in its own operations and supply chains, taking into account the nature of UNICEPTA's business and supplier relationships.
- applies appropriate due diligence measures for relevant suppliers and service providers, such as contractual compliance expectations, risk-based supplier checks and escalation of concerns where appropriate.
- regularly trains its employees and sensitises its managers.
- has implemented a group-wide whistleblowing system. Internal and external stakeholders can confidentially report concerns, including concerns related to modern slavery, via the reporting channels described on UNICEPTA's responsibility page and in the group-wide Whistleblower System Policy.

8 KPI's

We are not aware of any violations of this policy in the past year.