

ogury

Ogury
Modern Slavery
Statement
2024



Ogury Modern Slavery Statement 2024

I. Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ogury's slavery and human trafficking statement for the year ending December 31, 2024. It sets out the steps Ogury Ltd. and its subsidiaries ("Ogury") have taken and are continuing to take to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Ogury is committed to acting ethically and with integrity in all our business dealings and relationships. We maintain a zero-tolerance approach to modern slavery, which includes slavery, servitude, forced or compulsory labour, and human trafficking, recognizing them as gross violations of fundamental human rights. Our commitment is guided by international principles, including the UN Universal Declaration of Human Rights, the ILO Core Labour Standards, and the UN Guiding Principles on Business and Human Rights.

Modern slavery can take various forms, including forced labour, debt bondage, sexual exploitation, criminal exploitation, and domestic servitude. Human trafficking involves arranging or facilitating the travel of a person for the purpose of exploitation.

II. Our Business, Structure, and Supply Chains

Ogury is a global adtech company that delivers Personified Advertising solutions grounded in privacy to brands, agencies and publishers by focusing on targeting personas, not people.

We deliver relevant audiences at scale and on quality publisher inventory thanks to our exclusive data, which is meticulously collected and crafted from millions of self-declared customer surveys, enriched with billions of impactful data points, and refined by AI. This results in audience insights and performance not available through any other adtech platform.

Founded in 2014 and headquartered in London, Ogury employs over 500 people across approximately 19 countries in North America, Latin America, Europe, and APAC.

Our supply chain primarily includes:

- Technology partners (cloud services, software).

- Publishers and media platforms.
- Professional service providers.
- Contractors and Financial Institutions.
- Office and facility suppliers.

While we assess the direct risk within our core technology operations as lower than in some sectors, we acknowledge the potential for risk throughout our supply chain.

III. Policies in Relation to Slavery and Human Trafficking

Ogury has fostered an organisational culture that respects dignity and human rights. This is implemented through various policies currently applicable group-wide, or being implemented, including:

- **Code of Conduct:** Outlines the expected standards of ethical and professional behaviour for all employees, reinforcing our commitment to integrity, human rights, and ethical conduct.
- **Modern Slavery and Human Rights Policy:** Sets out our commitment and approach.
- **Whistleblowing Policy:** Enables confidential reporting of concerns.

We are committed to ethical sourcing and procurement, respecting international standards against criminal conduct and human rights abuse.

IV. Due Diligence and Risk Management

Ogury is committed to ensuring transparency within our business and supply chains. We assess risks considering factors like geographical location, industry sector, and the nature of the services provided. Ogury conducts regular reviews of its supplier base against the Global Slavery Index and U.S. Department of Labor reports. In the past year, less than 1% of suppliers were located in high- or moderate-risk countries (including China, India, Indonesia, Malaysia, Mexico, Philippines, Thailand, Türkiye, Ukraine, United Arab Emirates, and Vietnam). No services are sourced from high-risk sectors such as agriculture, construction, textiles, cleaning, or hospitality.

As of today, any case has been reported or addressed to the Legal Department regarding modern slavery related concerns.

V. Training and Awareness

Ogury ensures that all new employees receive our Code of Conduct upon joining, which outlines our core principles of ethical behaviour and integrity. Our Modern Slavery and Human Rights Policy and our Whistleblowing Policy are readily accessible to all personnel, providing a clear and confidential channel for raising concerns, including any suspicions related to modern slavery.

Recognising the importance of specific awareness in this area, Ogury is committed to enhancing understanding across our workforce. We will be developing dedicated training targeted at employees in key functions and will focus on educating them about the risks of modern slavery and human trafficking, our relevant policies, and the procedures for reporting concerns.

VI. Measuring Effectiveness (Key Performance Indicators - KPIs)

Ogury is committed to monitoring the effectiveness of our actions. We will identify and utilize key performance indicators (KPIs) to benchmark and monitor progress. These may include:

- Percentage of total suppliers located in high- or moderate-risk countries
- Percentage of suppliers operating in high-risk sectors
- Number of modern slavery-related concerns reported and addressed

VII. Reporting Concerns

All Ogury personnel have a responsibility to prevent, detect, and report concerns related to modern slavery. We encourage reporting any suspicions, however small, at the earliest stage. Concerns can be raised with a manager, through our Whistleblowing Policy or through our Whistleblowing hotline at <https://www.safecall.co.uk/file-a-report/>. No reprisal or retaliatory action will be taken against any individual for raising concerns in good faith under the process laid out in the Whistleblowing Policy. We aim to protect the identity of those raising concerns where possible and are committed to ensuring no one suffers detrimental treatment for reporting in good faith. External

parties can communicate concerns to Ogury's General Counsel at Legal@ogury.co .

IX. Enforcement and Remediation

If a violation is identified, Ogury will investigate and verify the facts, potentially involving an independent investigation or expert advice. Remedial action depends on the severity, our connection to the issue, and our degree of influence. We will cooperate with relevant authorities as necessary. Failure by suppliers or partners to address issues may lead to reconsideration of the commercial relationship, including potential termination. Violations by employees will result in disciplinary action, potentially dismissal.

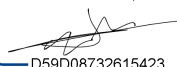
VIII. Governance

The Ogury Board of Directors has overall responsibility for ensuring this statement complies with our legal and ethical obligations. The Legal department has primary responsibility for implementation, monitoring, and auditing. Senior leadership, including the CEO and relevant cross-functional teams (procurement, risk, HR), are involved in due diligence and compliance.

X. Approval

This statement has been approved by Ogury Ltd.'s Board of Directors on **07 March 2025**.

Signed:

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Jean Canzoneri

7/11/22

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