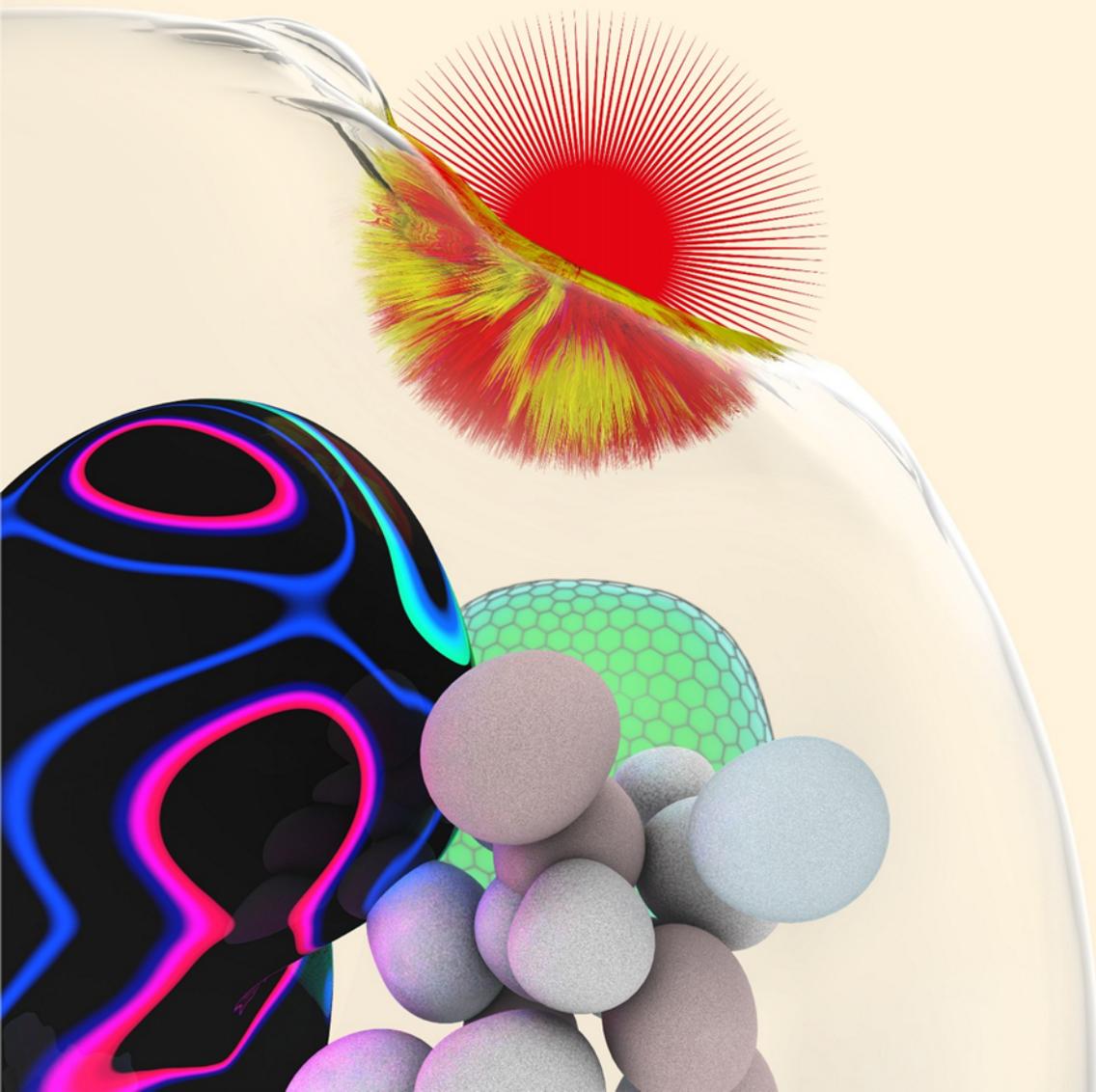


bango[®]

Modern Slavery Policy



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Document change log

Date	Version	Name	Change detail
June 2024	V.0.1	Alessia Gilardi	First Draft
July 2024	V.0.2	Rachel Ellis	Second Draft
20 September 2024	V.1.0	Bango plc Board	Approved by Board
2 September 2025	V.2.0	Rachel Ellis	Annual Review

Background

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking. All have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Bango has a zero-tolerance approach to modern slavery.

The purpose of this policy is to:

- set out Bango's responsibilities, and the responsibilities of those working at and on behalf of Bango, in observing and upholding Bango's position on modern slavery and human trafficking
- provide information to those working at and on behalf of Bango on how to identify and report concerns regarding modern slavery and human trafficking.

This policy applies to everyone working for Bango and on behalf of Bango, in any capacity, including employees at all levels, directors, officers, agents, contractors, suppliers, and business partners.

This policy does not form part of any employee's contract of employment and Bango may amend it at any time.

Bango commitment

Bango is committed to:

- acting ethically and with integrity in our business dealings and relationships
- preventing modern slavery from occurring within Bango and our supply chains
- ensuring there is transparency within our business and operations, and in our approach to tackling modern slavery throughout our supply chains.

We expect the same high standards from all our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of modern slavery, and we expect that our suppliers will hold their own suppliers to the same high standards.

Responsibility for this policy

The Bango board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under Bango's control comply with it.

Bango General Counsel and the legal/compliance team, have primary and day-to-day responsibility for:

- implementing this policy
- monitoring its use and effectiveness
- the delivery of training on the topic
- dealing with any queries about any aspect of modern slavery
- auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Bango, or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

How Bango protects against modern slavery

Bango has implemented various measures to combat modern slavery. Further details of these are set out in the Modern Slavery Statement attached at Annex 1. A copy of this can also be found on the Bango website at www.bango.com This policy, and the Modern Slavery Statement, are reviewed and, as necessary, updated at least annually.

How to raise a concern

If you suspect a breach of this policy, or have any concerns about any issue or suspicion of modern slavery in any part of Bango's business, operations or supply chains, you must email legalteam@bango.com as soon as possible. Alternatively, you can report any concerns you may have in accordance with our [Whistleblowing Policy](#). All reports will be taken seriously and investigated promptly.

In line with the Bango value of Transparency, we encourage openness, and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of within Bango or in any of our supply chains.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Bango may terminate its relationship with other individuals and organizations working on our behalf if they breach this policy.

Annex 1 - Bango PLC Modern Slavery Statement

Introduction

Bango is committed to trading ethically and sourcing responsibly. We have a zero tolerance to slavery and human trafficking. This statement highlights the key activities undertaken during the last financial year (FY2023) to combat modern slavery and human trafficking in our business and supply chain.

The Bango business, organisational structure & supply chains

Bango technology brings together content providers with telcos to create the world's biggest subscriptions bundling marketplace, giving consumers the content they want in the way they want it. The Bango Digital Vending Machine® (DVM) makes it easy for subscription services to be offered as bundles.

Bango is headquartered in Cambridge, UK and has about 180 employees globally.

Bango products are almost exclusively designed, produced and delivered internally. Bango therefore engages with a very limited number of external providers to support its business operations. Bango external providers are mainly tech companies, and all operate in accordance with the highest industry standards.

Bango's supply chain does not include any areas identified as being at high risk of modern slavery or human trafficking. Nonetheless, Bango remains vigilant and within 2024 reviewed its procedures for the onboarding and ongoing review of partners and service providers.

Bango policies and actions targeting slavery and human trafficking

Policies

To mitigate the potential risk of modern slavery and human trafficking, Bango has adopted, maintains and actively implements the following:

- Anti-Slavery Policy
- Bango Anti-Corruption and Bribery Policy
- Bango Gifts and Hospitality Policy
- Bango Whistleblowing Policy
- Employer Equal Opportunity Policy
- Health and Safety Policy
- Employee Grievance Policy
- Salary & Benefits Policy

Wider actions

In addition, Bango has implemented various additional measures to protect against modern slavery and human trafficking, including:

- The incorporation of modern slavery and human trafficking considerations within its enterprise risk management framework and associated regular risk assessments.
- The Legal / Compliance team retains oversight of Bango compliance with modern slavery and human trafficking requirements across the business.
- Board oversight of the measures taken to combat slavery and human trafficking.
- Implementation of measures to protect whistle blowers.

- Incorporation of specific clauses addressing modern slavery and human trafficking in contracts with suppliers, customers and partners.

Bango employees

Given its limited number of suppliers, the most important area of focus for Bango from a modern slavery and human trafficking perspective is its employees. Bango is committed to ethical employment practices and strong employee engagement. The People team has implemented a number of processes and measures to protect the interests and wellbeing of employees including:

Right to Work

As part of Bango zero-tolerance approach to slavery and human trafficking, our People Team conducts rigorous pre-employment checks to ensure all prospective staff have the legal right to work in the UK or other relevant countries and meet the legal age requirements for employment.

Fair Compensation

We ensure that all employees are compensated fairly, with salaries set at no less than the national living wage where applicable or according to market standards based on the role and level of seniority. This ensures equitable and competitive remuneration across all positions.

Employment Terms and Conditions

The standard terms and conditions of employment for Bango employees are drafted in compliance with all applicable laws and reviewed regularly to ensure they are kept up to date with the latest legal and regulatory requirements, and best practise. These terms include provisions that allow employees to terminate their employment at any time, with appropriate notice, ensuring freedom of movement within their careers.

Health and Safety

Bango is committed to the health and safety of all who are involved in or affected by its operations. We comply with all applicable laws and regulations, assess the risks inherent in our activities and implement relevant control measures, including the provision of regular training, to minimize potential harm to the health, safety and welfare of employees and the public.

Employee Wellbeing

Bango is dedicated to supporting the wellbeing of its employees. We offer comprehensive mental health support and a variety of private medical care options tailored to meet the specific requirements of each country where we operate. This commitment to health and wellbeing is a cornerstone of our employment practices, reflecting our dedication to promoting a supportive and ethical workplace environment.

Annual employee engagement survey

Each year, a comprehensive, externally managed employee engagement survey measures employee engagement. The survey is an invaluable resource which allows employees to provide direct, detailed feedback, and helps ensure Bango maintains its inclusive, innovative and stimulating company culture. It is an invaluable way to collect feedback across the entire business and identify measures for improvement.

Next steps

Following a review of the effectiveness of the steps taken this year to minimize the risk of slavery or human trafficking in our supply chains, it is clear that the risk of modern slavery and human trafficking at Bango is very low. This is expected to be the same in the 2025 financial year.

Looking ahead over the next year, Bango intends to supplement the measures outlined within this statement by implementing updated partner and supplier onboarding processes. All Bango policies are reviewed annually, and the Compliance function reviews existing policies, systems and processes at least annually, ensuring updates and/or additional processes and policies are implemented as appropriate.

This statement is prepared and published in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Bango group's slavery and human trafficking statement. It is made in relation to the financial year ending 31 December, 2024 and was approved by the board on 26 September, 2025.

PAUL LARBHEY, CEO

BANGO PLC

26 Sept, 2026