

## **Anti-slavery and human trafficking statement and policy**

Welcome to NAGY CZ's anti-slavery and human trafficking statement and policy. This statement and policy relates to NAGY CZ Kft..

### **Anti-slavery statement**

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At NAGY CZ we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### **Anti-slavery policy**

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, third-party representatives and business partners.

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

### **Responsibility for this policy**

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

The HR manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved.

Comments, suggestions and queries are encouraged and should be addressed to the HR manager via the contact page of our website.

### **Compliance with this anti-slavery policy**

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

The prevention, detection and reporting of modern slavery in any part of our is the responsibility of all those working for us or under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier constitutes any of the various forms of modern slavery, raise it with your manager.

We aim to 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 in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR manager immediately.

If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Staff handbook, which is available upon request.

### **Communication, training and awareness of modern slavery**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches**

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

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

### **Due diligence**

Due diligence is an essential practice for NAGY CZ. We consistently monitor our clients, customers, employees, cash flow, assets, insurance policies and third party suppliers, and are taking all necessary measures to identify, prevent and mitigate incidences of modern slavery in our operations and supply chains.

### **Risk assessment and management**

NAGY CZ seeks to assess and manage risk of modern slavery within the workplace.

Our on boarding process with workers and contractors include checking personal identification documents, and personal details such as address and bank details. These are an essential compliance process, but are also considered as potential indicators of modern slavery that may need further checking.

Our processes include checking documents, which will highlight any workers unwilling to provide that information. For example, an instance of a worker at risk could be if they have had their personal belongings or identification taken from them — or if other documents are being withheld.

An individual may also not have their own bank account, or may be found to have a common address with many other workers are recognized as potential indicators of modern slavery that may need further checking.

Injuries, fatigue or poor physical health are also recognized as potential indicators of modern slavery that may need further checking.

Where concerns are raised with regards to risks of modern slavery in the workplace, these are dealt with swiftly, in accordance with NAGY CZ's anti-slavery policy.

## **Content policy**

By posting content on Nagy CZ's website, you agree to abide by this policy. We reserve the right to remove any content, in whole or part, that violates this policy, our Terms of Service or for any other reason at our sole discretion.

In the event of repeated or severe violations, we may suspend or permanently deactivate the account(s) in question.

You can report the content directly or contact us to report content that appears to violate this policy.

### **The following content is not allowed on Nagy CZ's websites:**

- Content created solely for the purpose of advertising or other commercial content, including company logos, links, or company names
- Spam, unwanted contact, or content that is shared repeatedly in a disruptive manner
- Content that endorses or promotes illegal or harmful activity, or that is violent, graphic, threatening, or harassing
- Content that is discriminatory
- Attempts to impersonate another person, account, or entity, including a representative of Nagy CZ
- Content that is illegal or that violates another person's or entity's rights, including intellectual property rights and privacy rights
- Content that includes another person's private or confidential information

### **Feedback and complaints**

Nagy CZ's website welcome feedback on all their content. Here is the way to provide feedback:

Contact – you can contact us using the Nagy CZ website contact form that will be sent to our Customer Service team. The team will pass on your feedback to the appropriate editorial team member. Alternatively you can email us at [contact@tyjam.com](mailto:contact@tyjam.com).

### **Complaint process**

In the event that a complaint is made about a piece of content that cannot be resolved by the Customer Service team, the matter will be escalated to the site's Content Director.

Note: If you wish to make a complaint about our content or any operational issues, please email [contact@tyjam.com](mailto:contact@tyjam.com).

## **Pre-screening and review for any content prior to publication**

All content on Nagy CZ's websites is reviewed prior to publication, in different ways.

For image content, the images are sent through our website by an already registered content provider.

The content arrives in our platform where our Moderation team can moderate it, according to our policies and also the Content policy and the Anti-slavery and human trafficking statement and policy.

Only after this step, the content can be published on our website, if it respects all the policies.

For video content, the videos are sent through a platform by an already registered content provider.

This content arrives in our video platform where our Video Moderation team can check if the content is in compliance with our policies, but also with the Content policy and the Anti-slavery and human trafficking statement and policy.

Only after this step, the content can be published on our website, if it respects all the policies.

## **Vetting procedure(s) or system(s) for all content and capability for the vetting system to enable umbrella reporting the acquirer**

If one of the content isn't complying with the policies, we have a procedure to respect.

For images content, our Moderation team warns the Content Manager to see what kind of procedure they have to start.

If the content doesn't respect our rules of publication but remains in the policies, the team send an explicative message telling why the content has been refused.

If the content doesn't respect the policies, the team informs the Content Manager, who also informs the Nagy CZ board to start a procedure with the competent authorities.

Then, we transmit the content in question to them, and we remain at their service if they contact us to ask for more information.

For video content, we deal with certified providers who already sent us video content before.

Our Video team watches anyway all the contents from beginning to the end, to ensure that the content remains in our rules and policies.

If the content doesn't respect the policies the team informs the Video Director, who also informs the Nagy CZ board to start a procedure with the competent authorities.

Then, we transmit the content in question to them, and we remain at their service if they contact us to ask for more information.

## **Compliance process to align the business activity with regulation requirements**

In our domain, we are always exposed to changes of regulation requirements.

First of all, our board work closely with our lawyers, to understand what changes are needed and how to put them online.

Then our lawyers work on the matter, especially when it's about to change our internal written rules.

When the changes have been written, our technical team adds the needed changes on our websites.

Finally, our Compliance team make a final check on the website, and warns if something is missing.

## **Monetization Policy**

NAGY CZ has developed its own monetization system, called Straceo, allowing to aggregate payments from the customers through its websites.

Users can pay through credit card or through a phone call for a per-unit buy.

Then there's a redirection between Mobyio (partner for per-unit buy) and credit card payments to make a summary of the payments.

We provide a platform to our partners so they can see the amount generated from the sales every month, and also generate an invoice.

## **Vetting and/or Moderation Policy and procedures**

All of contents that are published on NAGY CZ's website are reviewed prior to publication, through a defined process.

There is also a precise process if one of the content doesn't respect the website rules and the policies.

### **Number of moderators :**

We have our internal moderator teams to moderate all the content published through our websites.

For NAGY CZ's website, there are 2 moderators, which are acting on the content at different period of treatment.

### **Monitoring process**

We deal with certified content provider, so we already know what kind of content they will send.

So there are two kinds of checking.

The first one is when the content arrives in our platform where our Video team can check it, according to our content rules and also the Content policy and the Anti-slavery and human trafficking statement and policy.

Only after this step, our dedicated webmaster reviews once again the content, to be sure that it respects all the rules and policies.

After these two steps, the content can be published on our website.

### **Real-time content removal process:**

If a content doesn't respect the rules or the policies, our Video team or our webmaster warn the Content Manager to see what kind of procedure they have to start.

If the content doesn't respect our rules of publication but remains in the policies, the team send an explicative message telling why the content has been refused.

If the content also doesn't respect the policies, the team informs the Content Manager, who also informs the NAGY CZ board to start a procedure with the competent authorities.

Then, we transmit the content in question to them, and we remain at their service if they contact us to ask for more information.