

## **Anti-Human Trafficking Policy**

### **1. Our position**

[JiggleJiggle.com](https://www.jigglejiggle.com) is operated by Sugar and Spice Media Limited, a company registered in England and Wales (company number 15167831), with its registered office at 124 City Road, London, EC1V 2NX. We have zero tolerance for human trafficking and modern slavery in any form, including the sexual exploitation of any person and the publication of content that depicts, results from, or facilitates trafficking. This policy sets out the steps we take to prevent our platform being used for these purposes.

While Sugar and Spice Media Limited falls below the turnover threshold that triggers a mandatory statement under section 54 of the Modern Slavery Act 2015, we support the aims of that Act and have adopted the measures set out below as a matter of policy.

### **2. How our platform works**

[JiggleJiggle.com](https://www.jigglejiggle.com) is a marketplace on which independent creators (“Models”) make content available for sale to customers. Only registered, verified Models are permitted to appear in content on the platform. The verification and review measures described below are the principal means by which we guard against trafficking and exploitation.

### **3. Verifying that everyone is an adult acting of their own free will**

Before any Model is permitted to open an account, publish, or sell content, we carry out an age and identity verification check through our verification provider, Yoti. This requires the Model to provide government-issued photographic identification and to complete a face scan, which is used to verify identity and to confirm the person is aged 18 or over. Age verification at account opening includes an automated check carried out through Yoti. No account may publish content until verification is complete.

Verifying the age and identity of every Model is a central anti-trafficking safeguard: it ensures that the people appearing in content are identifiable adults, not minors or unidentified individuals who may be victims of trafficking or coercion.

Before a Model can upload or sell content, they must complete a moderation profile, which requires them to upload headshot images of themselves. These images are used by the platform to check the Model’s face against the content they upload. Each item of content is submitted for review and, before it is made available for sale, it is reviewed to confirm that the individual depicted is the same individual who created the verified profile. Only registered, verified Models may appear in content, and content featuring any other person is prohibited under our Acceptable Use Policy.

### **4. Consent**

We require that every person appearing in content has consented to that content. When a Model uploads content, they confirm their consent to that content being made

available for sale on the platform. Where content is co-created with another registered Model, the consent of that Model is required before the content is published. Content produced or distributed without the free consent of every person depicted is prohibited and will be removed.

The platform operates as a marketplace and has no creative involvement in the content Models produce. Consent is given by the Model on registration and on each occasion that content is submitted for sale. No person other than a consenting registered Model may appear in content.

## **5. Reviewing content before it is published**

Every item of content is reviewed before it is made available for sale. This review is carried out by a person and not by automated screening alone. The reviewer confirms that the individual appearing in the content is the verified account holder who created the profile, by checking the content against the headshot images held for that account, and that the content complies with Our Agreement With You and our Acceptable Use Policy. No content is published for sale until this review has been completed. This is consistent with the commitment to moderate content before it is posted that is made in Our Agreement With You.

Where review or any report identifies indicators of trafficking, coercion, or exploitation, the content is removed and the matter is escalated as set out below.

## **6. Reporting suspected trafficking and removing content**

Anyone, whether or not they hold an account, can report content they believe involves trafficking, coercion, or exploitation, or request removal of content depicting them without consent, by emailing [takedown@jigglejiggle.com](mailto:takedown@jigglejiggle.com). We assess reports promptly, aiming to review a request within 3 working days and, where removal is approved, to remove the content within a further 2 working days. We may remove any content from the platform at any time, and will act immediately where there is a credible indication of trafficking.

## **7. Cooperation with law enforcement**

Where we identify, or are made aware of, content or conduct that may involve human trafficking, modern slavery, or related criminal offences, we preserve relevant records and report to the appropriate authorities, which may include the police, the National Crime Agency, and the Modern Slavery and Exploitation Helpline. We cooperate fully with law enforcement investigations.

## **8. Responsibility and review**

Responsibility for content review and for this policy sits with the director of Sugar and Spice Media Limited, who reviews all content before it is made available for sale. People

involved in onboarding and content review are briefed on recognising indicators of trafficking and exploitation. We review this policy at least annually.

## **9. Contact**

Questions about this policy can be directed to [admin@jigglejiggle.com](mailto:admin@jigglejiggle.com).

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