

Modern Slavery Statement

Integrated Management System (IMS)

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Modern Slavery Statement 2022

This statement is made pursuant to Section 54 of the UK's Modern Slavery Act 2015 on behalf of The Imagination Group Limited and Imagination Europe Limited ("Imagination"). This statement relates to our financial year ending 31 August 2022. We publish our statement annually, generally within six months of the end of our financial year.

Our business, organisational structure and supply chains

Imagination is an experience design company founded on the principle of Independent Creativity. We create experiences that change the status quo for some of the world's most exciting brands - across the core offers of Consulting, Destinations, Content and Live.

Imagination Europe Limited is the primary UK company in the Imagination corporate group, and The Imagination Group Limited is the UK holding company. We are a global organisation and implement our policies and practices, and all principles therein, in particular, in respect of Modern Slavery, across all our global offices.

The nature of our business and the diversity of the services we offer means that our supply chains are extensive, complex and dynamic. Our suppliers can be grouped into two main categories:

- (i) those that provide services directly to Imagination to enable us to run our company, such as information technology and telecommunications service providers, professional advisors and office facilities, cleaning and catering service providers; and
- (ii) those that provide services to enable Imagination to perform client work, of which our key suppliers are venues, hotels, stand builders, event production companies, AV suppliers, film production companies, DMCs, travel suppliers, logistics services providers, plant hire, artistes and SaaS providers. Modern slavery, human trafficking and forced labour are not prevalent in the industries that we predominantly operate in and, as such, we believe our business to be low risk in terms of modern slavery.

However, we appreciate that higher modern slavery risk may exist further down our supply chains, for example, in the textiles, agriculture and construction industries.

Our policies on modern slavery

Imagination does not tolerate modern slavery or human trafficking in its organisation or supply chains. Imagination remains committed to endeavouring to ensure that its business activities and supply chains are free from any kind of slavery, human trafficking or forced labour.

This policy is reviewed annually to ensure it still appropriately reflects the Imagination business and sets out the minimal requirements we expect to ensure that our business and suppliers act ethically and with integrity.

This Modern Slavery Policy is further enhanced by our various other employment related policies that address issues such as corporate responsibility, working hours, working conditions, whistle blowing, menopause, discrimination, health and safety in the workplace, holiday and sick pay and the protection of personal data.

Supplier Code of Conduct

As planned, we released and posted on our website [imagination.com](https://www.imagination.com) a Supplier Code of Conduct. The Supplier Code of conduct made clear to our Suppliers what is required of them across a range of ethical issues and in particular Modern Slavery. Moreover, it stressed the need for suppliers to cascade these same standards and expectations to their own suppliers in order to ensure alignment across the whole supply chain.

Procurement Policy

Also in 2022, a new Procurement Policy was introduced to provide an improved, transparent and fair framework when commissioning suppliers on Imagination projects. The policy promotes ethical business practices by providing mechanisms for suppliers and employees to report any suspected anti-competitive behaviour (supplier collusion), human exploitation, or fraudulent activity.

These two initiatives will be key in facilitating Imagination's due diligence process to identify and mitigate the risk of modern slavery in its supply chains.

In the next 12 months, we will establish and introduce an Employee Code of Conduct to ensure that those working for the Company have clear guidelines on the standards of personal behaviour that is expected of them. It will enhance their ability to spot any suspected unethical behaviour or practices in themselves or their colleagues and how to make senior management aware in a positive and non-confrontational manner.

Due diligence processes

Having introduced these two initiatives, we will over the course of the next 12 months focus on identifying the categories of suppliers where unethical practices are known to exist and the countries with poor records in this regard. We will conduct sample audits of suppliers considered to be at risk. The Supplier Code of Conduct clearly states that failure to meet our standards will result in suppliers being blacklisted and, in the event of a material breach, in legal action.

Risk assessment and management

Imagination continues to undertake risk assessments and audits of suppliers in its global operations. Since launching its Modern Slavery Policy in 2017, Imagination has not identified any high risk suppliers or areas of concern from the risk assessments and audits. We continue to assess and audit new and existing suppliers across the global business operation.

Performance Indicators

Imagination will continue to monitor Modern Slavery risk, including by considering information received from our suppliers and through our due diligence processes, training programmes and our professional organisation partners.

Training

Online training in Modern Slavery is mandatory for all permanent and fixed term contract employees and requires each employee to successfully complete a test to ensure that they fully understand the issues and



how to combat them, as well as their responsibilities with regards to suppliers and the wider supply chain.

This Modern Slavery Statement has been approved by The Imagination Group Limited Board of Directors.

Simon Bruxner-Randall

Group COO, for and on behalf of The Imagination Group Limited and Imagination Europe Limited