

Modern Slavery Statement

Integrated Management System (IMS)

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Modern Slavery Statement 2021

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 2020. We publish our statement annually, generally within six months of the end of our financial year. However, our statement for the financial year ending 31 August 2020 has been delayed whilst we responded to the effects of the coronavirus pandemic on our employees, clients and business.

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, discrimination, health and safety in the workplace, holiday and sick pay and the protection of personal data. Furthermore, during the course of 2021, we plan to release a new Supplier Code of Conduct that will reiterate Imagination's position on modern slavery. This Supplier Code of Conduct, together with the implementation of a new supplier procurement process, will be key in facilitating Imagination's due diligence process to identify and mitigate the risk of modern slavery in its supply chains.

Due diligence processes

In 2019, new due diligence procedures were introduced for new suppliers to the business. Supplier contracts and terms and conditions were amended to impose stringent obligations on suppliers from a modern slavery, anti-bribery and anti-corruption, information security, harassment and whistleblowing perspective. Further improvements and engagement with higher risk suppliers were scheduled for 2020 but delayed into 2021 as the business responded to the challenges brought about by the COVID-19 pandemic. A new supplier procurement process and related tool is being developed and will be trialed in 2021 to enhance our supply chain compliance (particularly around modern slavery) starting with our key supplier base.

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