

Modern Slavery Policy

Integrated Management System (IMS)

Policy Owner: Group COO

Author: Simon Bruxner-Randall

Approval date: 30 January 2017

Version no: 1.0

Last review: 1 January 2018 by Claire Dykes, HR Director

1. Introduction

The Imagination Group Limited ('Imagination') is committed to ensuring that its business activities, workforce and supply chains are free from any kind of slavery, forced labour and human trafficking.

2. Directly employed workers

Imagination observes all relevant legislative provisions related to employment in all countries in which it operates. Workers employed directly by Imagination will be contracted under appropriate employment related legislation in the relevant country of business operation.

3. Supply chains

Imagination requires its suppliers to adhere to the following provisions and to seek no less favourable provisions from their suppliers:

- All work must be voluntary and workers have the freedom to terminate their employment given notice of reasonable length.
- Workers' personal freedom of movement shall not be unreasonably restricted. They shall not be physically confined to the workplace or to recruiter-operated residences; nor shall any other coercive means be used to restrict personal freedom.
- Workers shall be treated fairly and equally.
- Workers are provided with written terms detailing work and employment conditions in a language they understand.
- Workers shall be paid at least the minimum wage required by applicable national laws and they shall receive any legally mandated benefits.
- Disciplinary policies shall not include any inhumane measures or sanctions. The use or threat of physical or sexual violence, harassment and intimidation against a worker, or his/her family is prohibited.

4. Grievance/Complaint Procedures

Any complaints by workers employed directly by Imagination should be raised through local business grievance/complaints procedures.

Imagination requires all suppliers ensure there is an effective grievance or complaint procedure available to their workers, in order that they can submit any complaints without suffering prejudice or retaliation. Suppliers are required to ensure that their suppliers also provide effective complaint procedures.

5. Private employment agencies and labour recruiters

Imagination encourages its subsidiary businesses and suppliers to hire workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, checks must be taken to ensure that the agencies/suppliers engaged operate legally, are certified or licensed by the competent authority where appropriate, and do not engage in fraudulent behaviour that places workers at risk of labour exploitation.