

Modern Slavery Statement

Integrated Management System (IMS)

Owner: Simon Bruxner-Randall, Group COO

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Modern Slavery Statement 2023

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 2023. 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, exhibition stand builders, event production companies, AV suppliers, film production companies, DMCs, travel suppliers, logistics services providers, plant hire, artistes, and PaaS 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 minimum 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 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

Our Supplier Code of Conduct is published on our website, [imagination.com](https://www.imagination.com). The Supplier Code of Conduct



makes clear to our Suppliers what is required of them across a range of ethical issues and in particular Modern Slavery. Moreover, it stresses 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

The current Procurement Policy was introduced in 2022 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 are key in facilitating Imagination's due diligence process to identify and mitigate the risk of modern slavery in its supply chains.

We are progressing with our plans to introduce a Company Code of Conduct giving clear guidelines on the standards of personal behaviour that is expected of all our employees. 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

We continue to work with our suppliers around the world to ensure compliance with our code of conduct. Our primary focus is with our direct suppliers based in countries with the highest risk (based on the Walk Free Global Slavery Index). However, recognising the potential for risk further down the supply chain, we're introducing new due diligence assessments for all significant suppliers over the next 12 months.

Risk assessment and management

Imagination continues to undertake risk assessments and audit the performance 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 performance 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. Completion rates for employees joining the Company are over 80% and a new training module for existing employees will be rolled out during the 2023-24 reporting year.

Assessing our impact

During 2023, we began measuring our impact and planning improvements for the benefit of the environment, communities, customers, suppliers, employees, and shareholders. Our chosen tool for this is B Labs B Impact Assessment which is used by over 150,000 businesses including all current and prospective B



Corporations.

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