

# Modern Slavery Statement

## Integrated Management System (IMS)

**Owner:** Henry Kennedy, Group General Counsel

**Approval date:** 28 Feb 2025

**Version no:** 1.7



## **Modern Slavery Statement 2024**

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 2024. 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, Live and Investor Communications.

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.

As part of our commitment to combating modern slavery and human trafficking, we have implemented a global Modern Slavery Policy.

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.

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



We also make sure our suppliers are aware of our policies and our expectation is that they must adhere to the same high standards.

### **Supplier due diligence processes**

We've further enhanced our due diligence process this year with the addition of a Preferred Supplier Program to our suite of tools that support our efforts to identify and mitigate the risk of modern slavery in its supply chains.

- (i) **Supplier Code of Conduct** - Our Supplier Code of Conduct is published on our website, [imagination.com](http://imagination.com). Under our contractual terms with our suppliers we require them to adhere to our Supplier Code of Conduct as well as our Modern Slavery Policy and other applicable policies. 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.
- (ii) **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.
- (iii) **Preferred Supplier Program** - To add further rigour to supplier management practices we're inviting our key suppliers across all markets to join our Preferred Supplier Program which includes a contractual commitment to continuous ESG improvements and transparency through their own supply chain. Over 15% (by spend) of our global suppliers have signed up to the program.

### **Risk assessment and management**

Since launching its Modern Slavery Policy in 2017, Imagination has not identified any high risk suppliers or areas of concern from the performance audits. We continue to assess 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, our policy on providing adequate protection for whistle blowers, as well as their responsibilities with regards to suppliers and the wider supply chain. A refreshed training module has recently been launched and the global completion rate is over 90%.

### **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.

To further aid our commitment to continuous improvement we are undertaking a third party assessment of our sustainability performance with EcoVadis, a global leader in business sustainability ratings. The EcoVadis Assessment rigorously evaluates companies on 21 sustainability criteria across four key themes of environment, labor & human rights, ethics, and sustainable procurement.

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

**Henry Kennedy**

Group General Counsel, for and on behalf of The Imagination Group Limited and Imagination Europe Limited