

Modern Slavery Policy (Global)

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1. Introduction

The Imagination Group Limited and its affiliate companies (“Imagination”) are committed to ensuring that its business activities, workforce and supply chains are free from any kind of slavery, forced labour, child labour and human trafficking. Imagination operates in strict accordance with all applicable international human rights regulations, including mandatory human rights due diligence standards frameworks across our global regions of operation.

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 and inline with the following key provisions:

- All work must be voluntary, and workers shall have the freedom to terminate their employment without financial penalty 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, including the withholding of worker identity or immigration documents, be used to restrict personal freedom.
- Workers shall be treated fairly and equally.
- Workers shall be 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.
- Workers or potential workers, including those hired through recruiters and agencies, shall not be charged any recruitment fees.
- The use of any workers under the age of 15, or the minimum legal working age, whichever is greater, is prohibited.
- When employing workers under the age of 18, all applicable laws shall be complied with, work shall not interfere with their compulsory education, and the work, or the circumstances in which it is carried out, shall not harm their health, safety, or morals.
- Workers documents (including proof of age) shall be checked prior to employment to confirm the legal right to work.
- Workers shall have the right to join or not to join trade unions or similar representative bodies.
- 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.

3. Supply chains

Imagination requires its suppliers to have their own written policies in place covering slavery, forced labour, child labour and human trafficking. Suppliers must also adhere to the key provisions set out in section 2, and to seek no less favourable provisions from their own suppliers.

To verify compliance with these provisions, Imagination reserves the right to request documentation, conduct supplier risk assessments, or execute third-party audits of supplier facilities. Suppliers must provide transparent access to relevant employment records upon reasonable request. Material non-compliance with this policy, or failure to cooperate with a verification request, may result in the immediate termination of the commercial relationship and any associated supply agreements.

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 to ensure that 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 must also ensure that their own supply chain supports and provides their own effective complaint and reporting 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, fully comply with the key provisions set out in section 2, and do not engage in fraudulent behaviour that places workers at risk of labour exploitation.

6. Training and Awareness

Imagination provides modern slavery awareness training to employees. This training ensures that the personnel most exposed to external supply chains can effectively identify risk indicators, respond to red flags, and enforce the compliance

expectations outlined in this policy. Imagination expects its suppliers to maintain a high level of awareness regarding modern slavery risks within their own operations. Suppliers must ensure that their staff (including managers, HR personnel, and procurement teams) receive appropriate training on identifying and preventing forced labour, human trafficking, and unfair practices.

Suppliers are further required to communicate the principles of this policy (or an equivalent standard) to their own workforce and sub-contractors, ensuring that all workers down the supply chain understand their rights and have clear visibility of available grievance channels.