



The Creative Engagement Group (Holding Co) Limited

MODERN SLAVERY STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by The Creative Engagement Group (Holding Co) Ltd and its subsidiaries WRG Worldwide Limited, WRG Group Limited and The Creative Engagement Group Ltd (together **TCEG**) during the year ended 31 December 2019 to prevent modern slavery and human trafficking in its business and supply chains.

Our Business

TCEG are subsidiaries of Huntsworth Limited which is the parent company of an international healthcare and communications group. TCEG operates with seven brands: WRG, The Moment, Axiom, Just Communicate, Forty1, Logicearth and Cormis. Further detail is available at www.tceg.com.

Protecting our Staff

TCEG is committed to providing its workers (which is deemed to include employees, staff, contractors and freelancers) with safe, legal employment in a stimulating and rewarding environment. We are opposed to any form of slavery and human trafficking (**Modern Slavery**) and strive to ensure that it is prevented from occurring in our business and in our supply chains.

TCEG aims to carry out all its business dealings in full compliance with applicable laws and with respect to internationally recognised human rights standards in every location in which we operate.

Our Policies and Training

Huntsworth Limited operate a range of internal policies and provide training, which are aimed at ensuring that TCEG always conduct business in an ethical and transparent manner. TCEG workers and directors are required to comply with these policies and undertake the related training. In the context of preventing Modern Slavery within TCEG, these policies include the following:

- *Code of Ethics Policy and an Ethical Trading Policy*, which together explain the manner in which we behave as an organisation and how we expect our workers, directors and suppliers to act. Each worker and director is responsible for upholding the principles and practices set out within both policies. Our overriding aim is to continue to build and support a culture which values openness, accountability and disclosure;
- *Human Resources policies*, that govern recruitment, equal opportunities and diversity in our workplaces, and which include, where appropriate, background checks for all employees to safeguard against human trafficking or individuals being forced to work against their will;
- *Whistleblowing Policy*, which allows all workers, through a confidential multichannel 24/7 whistleblowing service across the Group, to voice any concerns about treatment of colleagues, or practices within our business or supply chains, without risk of reprisals; and
- *Sanctions Policy*, which makes clear to workers and directors that we will not do business with any organisation or individual that is subject to economic or other sanctions issued by bodies such as the UN, USA Government, UK Government, and the EU.

The policies are regularly reviewed to ensure that they are fit for purpose and consistent with any changes in legislation and best practice. Workers and directors are made aware of these policies, including during the induction period upon joining TCEG. All workers and directors have access to Group policies via a 24/7 online policy management portal.

Our Supply Chains

We have an extensive supply chain but consider, because of the type of suppliers combined with how closely we work with them, that there is a low risk of exposure to slavery and human trafficking. Our supply chains include technical suppliers supporting our delivery of live events, environment build and film and digital production as well as standard business support activity such as cleaning and catering services, IT hardware and software providers, through to office fit out & maintenance services and document retention services.

TCEG recognises that it is vital to preserve the highest standards of integrity and transparency within its supply chains, so that those employed within them are not exposed to any form of exploitation. We are therefore selective in our choice of suppliers and conduct the necessary due diligence checks. However, our suppliers may have their own complex supply chains and it is therefore not practicable for us to have direct oversight or management of the working conditions of each supplier. To counter this, where possible, we aim to reduce complexity in our supply chains, so that any weaknesses can be more readily determined and dealt with through a risk-based assessment.

Our Effectiveness in Combatting Modern Slavery

During 2019 the Huntsworth group undertook an exercise, in which TCEG played an active part and participated fully, including, amongst other matters, the following steps aimed at ensuring that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business:

- Implemented initiatives for onboarding new suppliers so that they now formally acknowledge their adherence to modern anti-slavery principles. This was extended to renewals of existing supplier contracts.
- Undertook a Supplier Risk Matrix, to categorise each of TCEG's existing suppliers into a risk category being high, medium, low and very low (nearly 1,500 suppliers were categorised). This confirmed that TCEG has no medium or high-risk suppliers and that just under half of our suppliers are very low risk.
- We raised and reinforced awareness of modern slavery and human trafficking. Amongst other matters, all worldwide workers were asked to watch an awareness video on modern slavery as part of the annual acknowledgement to comply with all the Group's policies.

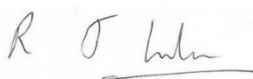
We are not aware of any incidents of Modern Slavery having been notified or identified during the period covered by this statement.

We believe that our culture of openness and accountability, when coupled with our policies and procedures, is effective in combatting the risk that Modern Slavery could be found in our business or in our supply chains. If an instance of Modern Slavery were to be uncovered, TCEG believes that it would be well placed to take swift and appropriate remedial action in line with the ethical values that underpin our business. We remain committed to further enhancing and strengthening effective systems and controls, on an on-going rolling basis, to safeguard against and mitigate any risk of Modern Slavery taking place within our business or supply chains.

During the period covered by this statement, TCEG has continued to identify and address the risk of Modern Slavery in its operations and supply chains, as explained above. Inevitably, since March 2020 management time has been focussed on dealing with and mitigating the effects on the business of the Covid-19 pandemic and that has led to the slight delay in the production of this statement.

This statement was approved by the Board of Directors of The Creative Engagement Group (Holding Co) Limited on 16th July 2020.

Signed



Russ Lidstone

Chief Executive Officer

On behalf of the Board of The Creative Engagement Group (Holding Co) Limited

