



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 2020 to prevent modern slavery and human trafficking in its business and supply chains.

Our Business

TCEG are subsidiaries of CD&R Artemis Holdco 1 Limited which is the parent company of an international healthcare and communications group (the **Huntsworth Group**). TCEG operates with five brands: WRG, The Moment, Axiom, Just Communicate and Forty1. 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 and workers (together **Workers**)) 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 Group 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, to voice any concerns about treatment of colleagues, or practices within our business or supply chains, without risk of reprisals. All whistleblowing incidents reported via the helpline are taken seriously and are reported to the Huntsworth Group's Chief Compliance Officer who, where appropriate, reports such matters directly to the Board for their consideration; 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.

These 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 these 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. Few if any suppliers to TCEG are significant in terms of the volume of business conducted with them, and many of them are small in size and based in the UK, US or in the EU.

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

A number of initiatives were introduced across the Huntsworth Group in 2018 and 2019 aimed at ensuring that slavery and human trafficking were not taking place in any part of the Huntsworth Group or in any part of the Huntsworth Group's supply chains, involving TCEG. During 2020 there was continued commitment to prioritise such initiatives, including the following:

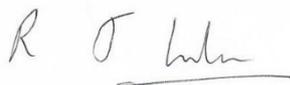
- Investment in a technology platform to further formalise the onboarding of suppliers and ensure that, amongst other matters, where a TCEG entity enters into a contract with a new supplier, the relevant supplier formally acknowledges their adherence to modern anti-slavery principles.
- As part of the annual training and compliance agenda, each year, all Workers and Directors are required to watch an awareness video on Modern Slavery and read the policies referred to above to reinforce and raise continual awareness of modern slavery and human trafficking. As part of the 2020 annual policy renewal process, all Workers and Directors were required to attest that they had watched the video and had read, understood and agreed to comply with such 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.

This statement was approved by the Board of Directors of The Creative Engagement Group (Holding Co) Limited on 29th June 2021.

Signed



Russ Lidstone

Chief Executive Officer

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