

Modern Slavery and Human Trafficking Statement

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Identity Holdings Ltd. has taken and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Identity Holdings Ltd. has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business and/or our supply chain.

Service offering

Identity is a full service, Human experience agency with over 20 years of proven pedigree in the delivery of major, high-profile events in the UK and globally.

Our policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner.

- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Accountability

Identity Holdings Ltd. takes full ownership of our modern slavery and human trafficking statement, below details the specific responsibility of key aspects within it:

- Any known or suspected breaches of slavery and/or human trafficking within the business would be investigated as a priority by the People and Culture Director.
- The People and Culture Director is accountable for reviewing all policies in relation to our personnel.

- The People and Culture Director is responsible for identifying appropriate training on modern slavery and human trafficking that will be delivered to all staff at Identity Holdings Ltd.
- The Procurement Manager will be responsible for any breaches that are identified within the supply chain and will report these to the People & Culture Director.

Supply Chain

Identity Holdings Ltd. requires all Suppliers to sign and agree to our standard Terms and Conditions. Within this we set out the obligations our suppliers are expected to adhere to, including but not limited to;

- ensuring that it and its personnel comply with the Modern Slavery Act 2015 and any anti-slavery and human trafficking policy that Identity has in place
- All suppliers within Identity's supply chain are required to provide information upon reasonable request to give Identity assurance that there is no human trafficking within the suppliers workplace or extended supply chain
- When requested submit to Identity a declaration of compliance with the Modern Slavery Act 2015 in a form to be provided by Identity
- All suppliers within the preferred supply chain are required to notify Identity in writing (and setting out full details of the relevant circumstances) as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain.

As part of our onboarding process all suppliers working with Identity are directed to our published policies via our website. This includes Our Modern Slavery and Human Trafficking statement allowing suppliers to review as frequently as required to ensure full compliance.

Recruitment

Identity Holdings Ltd. requires all new staff to provide proof of identity and right to work in the UK before employment commences. Physical checks of employee's passports or birth certificates are always conducted by the internal resourcing team.

Identity Holdings Ltd. will occasionally use reliable and dependable employment agencies to source staff. All new agencies are subject to our robust supplier screening and will be vetted against our own policies and processes before engagement.

Commitments

In accordance with Modern Slavery Act 2015 ('The Act') Identity Holdings Ltd. have a zero-tolerance approach to modern slavery and human trafficking and are fully committed to preventing it in every aspect of our operations. We are committed to:

- Continue to explore new training materials and methods with the aim of increasing our staff awareness of the Modern Slavery Act 2015 and to help them identify and report concerns.
- Maintaining a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Training

Identity Holdings Ltd. have identified an appropriate training course on modern slavery and human trafficking and are in the process of rolling it out to all members of staff. Post initial completion, all staff will be required to complete refresher training every subsequent year after that. Our organisation's modern slavery training will aim to cover:

- How to assess the risk of slavery and human trafficking in the workplace
- How to identify the signs of slavery and human trafficking in the workplace
- How to escalate potential slavery or human trafficking issues and concerns
- Working conditions that could affect our supply chain and thus preventing purchases of goods or services with unworkable deadlines, unrealistic cost, or commissioning work for wages below a country's national minimum

Approval for this statement

This statement was approved by the Board of Directors on 1st August 2022.

Name (Managing Director) **Paul Fitzpatrick**

Signature

