

# Modern Slavery and Human Trafficking Statement

## Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 for Identity Events Management Ltd ("Identity") and sets out the steps that Identity 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.

## Overview and Scope

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. This Statement sets out the commitments of our company in relation to modern slavery. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and our organisation is committed to preventing it in our business activities and ensuring that our supply chains are free from, slavery and human trafficking.

## Our Policies

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

- Modern Slavery and Human Trafficking Policy – We operate a robust policy that ensures awareness and training across our organisation in identifying and preventing the presence of Modern Slavery and Human Trafficking in our operations.
- Recruitment Policy – We operate a robust recruitment policy, including conducting eligibility to work in the UK check 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 takes full ownership of our Modern Slavery and Human Trafficking Statement. Below details the specific responsibilities of key aspects within it:

- Any known or suspected breaches of modern slavery and/or human trafficking within the business would be investigated as a priority by the Head of People and Culture
- The Head of People and Culture is accountable for reviewing all policies in relation to our personnel
- The Head of People and Culture is responsible for identifying appropriate training on modern slavery and human trafficking that will be delivered to all employees at Identity
- The Procurement Manager is responsible for identifying and addressing any breaches of our anti-modern slavery standards within the supply chain. This is not limited to purchases of goods or services with unworkable deadlines, unrealistic cost, or commissioning work for wages below a country's national minimum.
- The Procurement Manager is responsible for reporting any identified breaches promptly to the Finance Director for further action.

Identity:

- Prohibits employees, directors, officers and representatives from engaging in threats, harassment, discrimination, or confiscating worker's original identification documents.
- Prohibits child labour, imposition of worker-paid recruitment fees, compulsory overtime and confiscation of workers original identification documents
- Guarantees workers' freedom of movement, association and the right to resign from employment with the company.
- Provides access to remedy, compensation and justice for victims of modern slavery
- Provides employees and managers with appropriate information and training to ensure understanding and compliance with this policy. Employees should speak to the People and Culture team at the earliest opportunity if they feel they have not received the suitable training to adhere to this policy.

## Training

We require all employees within the company to complete a training module on modern slavery and human trafficking. This is required to be complete within the first week of joining the business and is refreshed annually. The training module covers:

- How to assess the risk of modern slavery and human trafficking in the workplace
- How to identify the signs of modern slavery and human trafficking in the workplace



# IDENTITY

- How to escalate potential modern slavery and human trafficking issues and concerns
- Working conditions that could affect our supply.
- What steps our organisation should take if suppliers or contractors do not implement anti-modern slavery policies in high-risk scenarios including their removal from our supply chains

## **Due Diligence within our Organisation**

Identity 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 HR team. Identity Events Management 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.

Identity has a zero-tolerance approach to Modern Slavery and Human Trafficking and are committed to continuing to explore new training materials and method with the aim of increasing our employee's awareness of the Modern Slavery Act 2015 and to help them identify and report concerns.

## **Due Diligence and Risk Assessment within our Supply Chain**

We engage only with suppliers who comply with laws regarding eradication of human trafficking and slavery.

After thorough examination of our supply chain, we affirm that neither we nor any organization within our supply chain, be it direct or indirect suppliers, engages in the use of forced labour to the best of our knowledge.

All suppliers engaged with Identity are required to adhere to our standard Terms and Conditions, which outline their obligations. These include, but are not limited to:

- Compliance with the Modern Slavery Act 2015 and any modern slavery and human trafficking policies instituted by Identity.
- Provision of Information upon reasonable request to verify the absence of human trafficking within the supplier's operation or extended supply chain
- Submission of a declaration of compliance with the Modern Slavery Act 2015 when requested, in a format provided by Identity.
- Immediate notification to Identity, in writing and with full disclosure, upon becoming aware of any actual or suspected instances of modern slavery or human trafficking within their supply chain.

Modern slavery considerations are integrated into each stage of the procurement process. We evaluate potential suppliers before they enter the supply chain, conducting thorough assessments to ensure alignment with our anti-modern slavery standards. We maintain a preferred supplier list, conducting due diligence on all



suppliers before allowing them to become a preferred supplier. Our Modern Slavery and Human Trafficking 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.

At Identity we acknowledge the heightened risk of modern slavery within certain sectors of our supply chain. The 'high-risk' categories which have been identified are cleaning, catering, security, and stewarding services. Consequently, we implement rigorous measures to mitigate this risk. By implementing these measures and fostering a culture of transparency and accountability, Identity strives to uphold ethical standards throughout our supply chain, combatting modern slavery and human trafficking at every level of our operations. A yearly review is conducted to update our 'high-risk' and implement any necessary measures to mitigate risk in line with relevant legislation.

### **Key Performance Indicators**


Performance against this statement and our Modern Slavery and Human Trafficking policy is measured against the following indicators:

- Successful implementation of additional modern slavery and human trafficking questionnaire into our onboarding requirements for 'high risk' suppliers.
- Satisfactory responses from all approved 'high risk' suppliers.

### **Approval for this Statement**

This Statement was approved by the Board of Directors on 01 August 2024. The next review will be completed by 31 July 2026

Name: Paul Fitzpatrick



Chief Operating Officer

