

ILUKA HOLDINGS LIMITED AND ITS SUBSIDIARIES SLAVERY AND HUMAN TRAFFICKING STATEMENT

SEPTEMBER 2020

This statement is made pursuant to the Modern Slavery Act 2015 (the "Act") and has been ratified by the Boards of iLUKA Holdings Limited, The iLUKA Collective Limited and iLUKA Japan K.K. ("iLUKA").

We do not tolerate any form of modern slavery or human trafficking in any part of our business and are committed to carrying on our business in a manner which respects the rights of individuals in the communities in which we operate. We have taken, and are continuing to take, steps to ensure that our businesses identify risk areas in their supply chains and to implement policies and procedures to eliminate those risks.

The Board of Directors of iLUKA are responsible for the overall strategic direction including ensuring that systems of identification and management of risk, including the risk of slavery and human trafficking in our business or supply chain are robust and appropriate.

ABOUT US

iLUKA is a specialised event agency, providing strategies, planning and operational fulfilment for sponsors and other stakeholders at global events.

OUR APPROACH

Our Responsible Business Code sets out the high-level behaviours we require each of ourselves and our subsidiaries, our staff and our trading partners to uphold. In it we state that:

"We will continue to strive to make a positive contribution to society and the environment by: maintaining high standards of marketing ethics; respecting human rights; respecting the environment; supporting community organisations; supporting employee development, and managing significant sustainability risks in our supply chain."

Our Responsible Business Code, Staff Code of Conduct and other policies aim to support and uphold the United Nations' Guiding Principles on Business and Human Rights.

- To raise awareness about the risks of modern slavery within our business and supply chain, we have provided training to our employees and contractors.
- Our work ranges from a creation of ideas, design, implementation and event delivery and coordination.
- Notwithstanding the diverse nature of the services offered by us and the significant number of individuals involved in delivering those services, we continue to consider our business as low risk for modern slavery and human trafficking issues. We have comprehensive employment policies and practices including flexible working, diversity and equal opportunities and grievance policies which minimise the risk of modern slavery.
- Whilst our businesses engage with a broad range of suppliers worldwide, we do not consider our supply chain to be high risk for reasons set out below.

ASSESSMENT

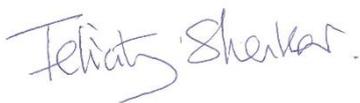
- We have assessed our supply base with a view to identifying high risk suppliers or areas for focus. This assessment included mapping by agency, category, spend and geography.

- Suppliers used by iLUKA were identified as typically falling within the following categories: professional services, logistics delivery, venue hospitality, security services, transport and travel, cleaners and maintenance. Goods that we purchase include items such as merchandise, utilities and general office equipment.
- Overall, the risk assessment demonstrated that the majority of our primary tier suppliers are in low-risk countries.

PROCESS

- We conduct due diligence on all our suppliers above a minimum threshold. The due diligence process includes conducting searches using a leading compliance tool which enables us to access data from a wide variety of data points on companies around the world.
- Once a supplier has been accepted, we continue to monitor for any change that may be notified through the compliance tool and regular checks.
- Through investment in technology in particular in financial management systems we have been able to monitor our supply chain more effectively.
- This has enabled our businesses to procure supplies more efficiently and enabled iLUKA to reduce the number of suppliers it buys from.
- Whilst we are confident there is limited risk in our primary tier suppliers, we acknowledge there is still work to be done to understand risks further down the supply chain.
- We continue to focus on areas where we deem risks may be higher, principally where we operate in geographies where our knowledge of, and relationship with, our suppliers is less deeply embedded.
- We continue to focus on ensuring that our processes are robust, systematic, and assess the risk of modern slavery within our supply chain. Training and ensuring the application of consistent high standards remain a priority.
- In addition to the above, we maintain a whistleblowing policy throughout the business to which all employees have access, including those in non-UK offices. In our periodic reminders to staff we include the reporting of concerns in relation to supply chain management including those relating to slavery and human trafficking.

Felicity Shankar, CEO



17 September 2020