

Inclusivity Statement and Human Rights Policy.

Inclusivity Statement

At Sparks EMEA, inclusion is foundational to who we are and how we work. Guided by our commitment to cultural fluency, we recognise that people experience the world, work and brand interactions differently depending on their culture, identity, background and lived experience.

We are committed to treating every individual with dignity and respect, and to creating an environment where difference is understood, valued and reflected in our decisions, behaviours and outcomes.

Our commitment to inclusivity extends beyond our workplace into the experiences we design, the partners we work with and the communities we engage. Cultural fluency means listening before acting, designing with context rather than assumption, and creating environments that are safe, accessible and welcoming to all. We actively challenge discrimination and exclusion, and continuously learn and adapt so that inclusion is embedded across our business and the work we deliver.

This commitment to inclusion and cultural fluency is formalised through our Human Rights Policy, which sets out the standards and responsibilities that guide how we operate across our business, supply chain and communities.

Human Rights Policy

Sparks EMEA, as part of The Freeman Company, is committed to respecting the human rights and dignity of all individuals within our operations, supply chain, and communities where we do business.

Our Human Rights Policy is based on our Core Values - Integrity, Empathy, Innovation, Enthusiasm, Learning Mindset and Collaboration - and is part of The Freeman Company Code of Conduct.

The Freeman Company and Sparks EMEA respects international human rights principles. We are committed to the principles outlined in the United Nations Global Compact and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

This global Human Rights Policy applies to all Sparks EMEA employees, those doing business with, or for, and others who may act on Sparks EMEA's behalf. This policy applies to all business locations and wherever Sparks EMEA business is conducted.

Our Commitments

Sparks EMEA is fully committed to human rights in the workplace. This commitment includes respecting the dignity and worth of all employees, encouraging all employees to reach their full potential and providing equal opportunities to all employees. Sparks EMEA is an equal opportunity employer and recruits, hires, trains, promotes, compensates and administers all personnel actions without regard to any legally protected status.

In addition, Sparks EMEA:

- Recognises its responsibilities with regards to workplace health and safety, employee privacy and freedom of association.
- Prohibits the use of forced labor and child labor.
- Does not tolerate any form of harassment or discrimination.
- Works to ensure compliance with applicable labor and employment laws, including those regulating wages and hours.

Sparks EMEA is also committed to a diverse workplace. Our teams are composed of individuals from different geographies, cultures, ethnicities, religions, races, genders and gender identities, sexual orientations, disabilities and generations. We are committed to fostering diversity, inclusion and engagement across all aspects of our business.

We are also committed to conducting business with the highest standards of ethics, honesty and integrity.

Our Shared Responsibility

All employees are responsible for ensuring compliance with this policy. Employees are strongly encouraged to raise any concerns with their manager, Human Resources or The Freeman Company HeyBlue Hotline. (North America 1-855-342-6939; United Kingdom 0808-234-6721). The Freeman Company will investigate any alleged violations of this policy and take appropriate corrective action, as necessary. Furthermore, we will regularly monitor our human rights commitments to ensure that we are continuously promoting human rights within the communities in which we operate.

Ownership & Consequences

The Freeman Company Compliance Committee and Chief Legal Officer are responsible for the maintenance of this Policy.

The Freeman Company reserves the right to periodically review and amend this Policy as needed. Violations of the Code of Conduct will result in discipline, up to and including termination of employment.