

Sparks EMEA

Modern Slavery Policy

INTRODUCTION

Sparks, a Freeman Company, is a global leader in corporate events, event exhibitions and brand experience. Sparks Marketing (EMEA) Limited is headquartered in the UK with a branch office in France (Paris). We believe organisations have social, cultural and environmental responsibilities to the community in which they seek to operate.

Sparks EMEA are environmentally focused and committed to weaving DE&I principles and sustainable practices into our work, respecting human rights and dignity of all individuals within our supply chains.

Our Modern Slavery Statement is based on our Core Values - Integrity, Empathy, Innovation, Enthusiasm, Learning Mindset and Collaboration - and is part of our Code of Conduct.

EMPLOYED AND CONTRACTED WORKERS

This Modern Slavery statement applies to all Sparks EMEA employees, those doing business with, or for Sparks EMEA and others who may act on our behalf. This policy applies to all Sparks EMEA business locations and those where business is conducted. Workers employed directly by Sparks EMEA will be contracted under appropriate employment related legislation of the country in which they operate.

When subcontracting is necessary, we ensure the agencies or suppliers engaged operate legally, are certified or licensed by the competent authority where appropriate, and do not engage in activity which places workers at risk of labour exploitation.

OUR COMMITMENTS

We comply with applicable laws, rules, and regulations of the countries in which we operate. We also maintain the Freeman Company, Code of Conduct, which sets out the seven most important commitments to doing business the right way;

- Be Good & do the right thing
- Be Fair & Respectful
- Be Safe & Hold each other accountable for Safety
- Be Ethical & Fair in Business Dealings
- Be Loyal & Trustworthy
- Be Honest & Accurate
- Be Dedicated to Social & Environmental Responsibility

We are committed to upholding fundamental human rights in the workplace and work with stakeholders to support efforts to protect them.

Our commitment to Human Rights includes:

- Providing safe and healthy working conditions to all our employees.
- Working to eradicate child labour, forced labour and any form of modern slavery within our operations and supply chains

- Complying with applicable labour laws and employment laws; including those regulating pays and hours.
- Providing transparent, fair, and confidential procedures for employees to raise relevant concerns.
- Providing employees with written terms and conditions in a language they understand; including freedom to terminate their employment given notice of reasonable length.

OUR SUPPLY CHAINS

Our supply chain is complex and dynamic due to the structure of our business and the wide range of services we offer. Our suppliers fall in to two categories: those providing goods and services to run our business i.e. IT, professional services, travel; and those used for client facing work such production and media.

There is an expectation whereby all suppliers follow a similar set of standards to those set out in our own Code of Conduct. These standards include requirements relating to human rights, (such as Modern Slavery), as well as labour practices (such as anti-harassment and discrimination, and health and safety), social impacts (such as anti-bribery and corruption) and other sustainability issues.

OUR DUE DILIGENCE PROCESSES FOR MODERN SLAVERY LIKE PRACTICES

- All Sparks EMEA employees carry out annual Code of Conduct training to maintain awareness of our obligations under the Modern Slavery Act.
- Hey Blue Hotline – A third party hotline for employees to anonymously report any potential violations of the Code of Conduct.
- An internal grievance procedure for employees to raise complaints, without prejudice or retaliation.
- Development of a working group to conduct a full review of our Sparks EMEA procurement procedures.