

## EXTERNAL STATEMENT RE MODERN SLAVERY ACT

This statement is published on behalf of International Management Group (UK) Limited and IMG Media Limited, and their subsidiaries (“**IMG**”) pursuant to section 54 of the UK Modern Slavery Act of 2015. It constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2019.

IMG is committed to combatting slavery in all forms, including human trafficking, forced labour and workplace abuse. This statement sets out the steps that IMG has undertaken, and is continuing to take, to ensure that slavery and human trafficking do not take place in any part of our business or our supply chains.

### Our Business Structure

IMG is part of the Endeavor group of companies and our ultimate parent company is Endeavor Operating Company, LLC, which is headquartered in Beverly Hills, California. IMG headquarters are in London, United Kingdom and operates globally. Its businesses include sports, fashion, and client management.

### Our Supply Chain

As a company focused on media sales, events and talent representation, the vast majority of our businesses use a variety of third party suppliers across the company to provide us with standard goods and services necessary to operate, which may include logistical support services, IT and office goods and services. Where IMG enters into markets that may require additional diligence it will use appropriate measures to guard against any forms of slavery or forced labour in its supply chain.

### Our Policies and Procedures

IMG has implemented several policies and procedures, the aim of which are to help ensure that slavery and human trafficking do not form part of our business or supply chains, including:

#### **1. Employee Code of Conduct**

All IMG employees are required to act in accordance with the principles set forth in our Company’s Code of Conduct (the “**Code**”). The Code states that employees have a responsibility to uphold the highest standards of business conduct and ethics, and to speak out if they see or suspect someone of violating these standards, any Company policy, or engaging in any illegal behaviour. Our Company’s Code of Conduct is revised periodically, and was updated in 2019. It includes requirements to follow the principles of fair employment and to review and report human rights violations within our supply chain.

#### **2. The Endeavor Ethics Helpline**

Further to the above, IMG has established the Endeavor Ethics Helpline (the “**Helpline**”) to facilitate reporting of potential violations of our Company’s policies or applicable laws. The Helpline provides an avenue for employees and others to raise concerns (anonymously if preferred and where permitted by law) 24 hours a day, 7 days a week in a variety of languages. All information is recorded by an independent third party who then provides the details to an internal investigator to handle as appropriate.

### **3. Third Party Due Diligence**

IMG requires that vendors and suppliers in high-risk jurisdictions undergo a due diligence screening process to identify public records indicating a history of bribery or corruption or other indications of illegal activity. This screening protocol has been implemented across the majority of our Company's business units and is designed to detect risk factors such as application of sanctions, involvement of politically exposed persons, and publication of adverse news media reports, including reporting regarding any involvement with slave labour or human trafficking.

### **4. Contractual Obligations**

IMG incorporates into its contracts an obligation for contracting parties to comply with all applicable laws, including the Modern Slavery Act where applicable. In addition to the standard contractual obligations, in 2019 IMG implemented a new process to require certain third-parties to review and agree to a Third-Party Code of Conduct which includes requirements to comply with labour and human rights laws as well as the principles of fair employment.

### **5. Training**

IMG has previously engaged an external specialist law firm to deliver specific training on the Modern Slavery Act to IMG's UK-based law department. In 2019, IMG Media production employees received in person training on modern slavery, including how to identify possible instances of forced labour or workplace abuse and reporting steps where such activity may be taking place.

### **6. Looking Ahead**

Over the course of the next financial year we will continue to review our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers and in relation to our own operations, including continued review of the obligations we require of our suppliers and training where appropriate.

This statement has been reviewed and approved by the Board of Directors of International Management Group (UK) Limited and IMG Media Limited.



Director

International Management Group (UK) Limited and IMG Media Limited

Date:

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