

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and on behalf of First Protocol Group Limited and its subsidiaries (listed below) for our Fiscal Year ending September 2020.

FIRST remains in full support of the laws introduced within the United Kingdom through the Modern Slavery Act 2015 to combat slavery, forced or compulsory labour and the trafficking of persons for any purpose. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As the leading global brand experience agency operating in 11 countries, FIRST understands the importance of removing slavery and human trafficking from our global society - we live by our Integrity value inside and outside of our business. This effort is part of our broader human rights agenda within the business that includes corporate action to promote worker protections, broader access to civil rights and community development

### **Our Business and Structure**

First Protocol Group Limited ("FIRST Group") serves as a holding company for agencies around the world. The entities include those under the FIRST and Clive brand. FIRST Group has subsidiaries, branches or permanent establishments in eleven countries, having recently added operations in Germany and Australia, and those subsidiaries have branch offices that include an additional three countries.

FIRST Group's holdings are leading global brand experience agencies providing Content, Creative, Digital Technology, Management & Delivery, and Data & Insights services. Operating as a full-service agency partner or through embedding specialist talent into client teams, FIRST brings together brands and people through creative and connected experiences. FIRST works with clients across industries including financial services, technology, media, consumer electronics, medical and healthcare, automotive, aerospace and the non-profit sector

### **Our Supply Chain**

Whilst we resource our core services including operations and account management in-house where we have greater control, like many large businesses we have a large supply

chain, especially in the on-site fulfilment of our events. We have identified that many of our direct suppliers are in countries where the risk of slavery and human trafficking is low. We do however work with our suppliers on a regular basis, review their policies, and approach to a number of factors including Modern Slavery and Human Trafficking.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

We consider the risk of modern slavery, servitude or human trafficking existing within our business or supply chains to be relatively low. However, we understand that the Modern Slavery risk is not static, and we will continue our approach to mitigating this risk in the year ahead.

Over the past year our supply chain has been affected by the COVID-19 pandemic. As travel restrictions and stay at home orders were put into effect, our service delivery shifted from on-site based services to virtual based services. This required FIRST to vet and onboard a new set of suppliers to help support our expansion into the digital space. A large portion of our supply chain, which had previously been made up of on-site venues and hotels, was shifted to focus on virtual platforms. In selecting our preferred partners in this space, FIRST utilized our policies and procedures and third party risk assessment tool to ensure our supplier standards were met.

### **Our Policies**

FIRST Group has a Global Risk and Compliance Committee, which consists of members of the Legal, Risk & Compliance, People and Culture and Finance departments. The Committee is led by Sam Sherman, VP, Risk & Compliance Officer and its' Group Board sponsor Edward Stanger. In 2019 the committee established a sub-committee dedicated to our compliance with Modern Slavery laws and tasked with producing this annual statement each year.

We have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. In addition to our annual statement, our stance is further highlighted in documentation directed toward employees, suppliers and clients.

**Employee Handbook** – FIRST’s handbook makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating locally and abroad and when managing our supply chain. It contains guidance on key identifiers to be aware of and a reporting process in which employees can raise concerns.

**Supplier Contracting** – FIRST is committed to ensuring that our suppliers adhere to the highest standards of ethics, and we aim to partner with reputable companies to ensure this. Our standard supplier contract, in addition to requiring suppliers to comply with applicable laws, specifically requires use of voluntary labour and prohibits slavery, servitude or the use of forced or compulsory labour and human or labour trafficking. FIRST requires heightened contracting standards in regions and industries that have been identified to have a higher risk. We act quickly, removing any supply chain partner where we have reasonable belief that they have fallen out of compliance.

Our previous statement assessment identified the need for a Supplier Code of Conduct which was produced in line with our annual commitment statement. This code of conduct covers a variety of key compliances areas such as Ethical Business Practices, Human Rights, Workplace Health and Safety, Environmental Compliance, Data Protection, Workplace Culture and Diversity.

**Client Contracting** - As part of ongoing revisions and enhancements to FIRST’s client service agreements, specific language has been included to cover the jurisdictional requirements related to modern slavery. These require our clients to comply with the law as applicable to them and also represent our ongoing commitment to compliance.

**Agency Workers Policy** – FIRST uses only specified, reputable employment agencies to source labour and we always verify the practices of any new agency we are using before accepting workers from that agency. FIRST operates a rigorous recruitment and selection process which includes obtaining documented proof of the individual’s right to work in the country they’ll be working in. We pay market competitive wages and will always pay colleagues at least the minimum wage rate applicable in the geography in which they work.

**Training** – To ensure a high level of understanding of the risks of modern slavery and human trafficking, each member of our procurement team is required to undergo specific

training. This training is aimed to help identify signs of modern slavery in the supply chain and in the workplace.

**Regional Expansion** - Prior to opening a new entity in any region, a business assessment is required which includes evaluating the risks associated with Modern Slavery

### **Our Assessment**

The Global Risk and Compliance Committee is tasked with tracking key performance indicators related to suppliers and agency workers. In reviewing our previous year's statement, we are pleased to report we were able to put into effect many areas of our commitment. As stated within, we have implemented a Supplier Code of Conduct and expanded training internally.

### **Our Commitment**

Over the next 12 months, we will continue our current approach to managing the risk of slavery and human trafficking within our business. Our ambitions include:

- Providing further training on modern slavery risks as part of our new employee induction and our annual compliance training.
- Continually reviewing and revising our policies and processes to ensure compliance with the Modern Slavery Act and all local standards in the countries that we operate as they continue to evolve.
- Further integrate compliance requirements into a broader base of supplier assessments.
- Draft and provide functional documentation for the various internal teams to highlight key areas of Modern Slavery compliance.

We will continue to work with companies whom we provide services to in order to ensure they are satisfied with our policies and procedures.

### **Subsidiaries Covered**

- First Agency Holdings Incorporated (United States)
- First Protocol Incorporated (United States)
- First Agency Solutions Incorporated (United States)
- First Global Management Services Incorporated (United States)
- First Global Management Services Inc (US)
- First Global Management Services Ltd (United Kingdom)

- First Protocol Event Management Limited (United Kingdom)
- First Agency Creative Services Limited (United Kingdom)
- First Agency Solutions Holdings (United Kingdom)
- First Agency Solutions Limited (United Kingdom)
- FIRST Events Agency Limited (Ireland)
- First Pte Ltd (Singapore)
- First Agency Solutions Pte Ltd (Singapore)
- First Agency Limited (Hong Kong)
- First Agency Solutions Limited Pty Limited (Australia)
- First Agency Servicos de Eventos LTDA (Brazil)
- Clive Agency Holdings Limited (United Kingdom)
- Clive Agency Limited (United Kingdom)
- Clive Agency Limited (Ireland)
- Clive Agency Incorporated (United States)

Signed and approved by:



Name: Edward Stanger

Title: Director

FIRST Group Board



Name: Sam Sherman

Title: VP, Risk & Compliance Officer

Global Risk & Compliance Committee

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