

MODERN SLAVERY STATEMENT

Prepared for Fiscal Year 2021

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 the year ending December 31, 2021.

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 multiple countries (please see full list at the end of the policy), FIRST understands the importance of removing slavery and human trafficking from our global society – we live by our values 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 and branches in multiple 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 / Due Diligence

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 fulfillment 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.

Our Policies

FIRST Group has a Human Rights and Ethics Committee, which consists of members of the Legal, Risk, Procurement, Compliance, People and Culture and Finance departments. The Committee is led by Edward Stanger, Group Board Director.

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. Specific areas include:

- Equal opportunity policy
- Grievance procedure
- Modern Slavery statement
- Whistleblowing policy

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. The Code of Conduct is now part of our Supplier Onboarding and Contracting.

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.

Employment Agency 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. We ensure that our agency partners follow 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 ensure our agency partners pay market competitive wages, and will always pay their workers 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, all employees globally will be required to undergo specific training. This training is aimed to help identify signs of modern slavery in the supply chain and in the work place, and we aim to achieve 100% compliance. Employees are reminded from time to time of the policies and notified of any updates.

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. In countries where FIRST does not have an established operation, we work with reputable and trusted partners for employer of record services to ensure we remain compliant with local laws and regulations relating to Modern Slavery.

Our Risk Assessment

The Human Rights and Ethics Committee is tasked with tracking key performance indicators related to suppliers and agency workers. We have embedded risk-screening criteria into our vendor management programme, with the aim of identifying potential risks or modern slavery and human trafficking, particularly in locations or industries that may have a high turnover of vulnerable workers, which lends itself to many forms of modern slavery.

Our risk-screening criteria includes the following indicators to help inform our risk assessment with respect to potential areas of vulnerability in our supply chains:

- country risk, as defined by the [Global Slavery Index](#), to identify countries that have a higher modern slavery and human trafficking risk
- categories of goods and services that we have assessed to have a higher modern slavery risk, as detailed by the [United Kingdom's Gangmasters & Labour Abuse Authority \(GLAA\)](#), including food and hospitality, FF&E (furniture, fixtures and equipment), security, and technology (hardware products).

In addition to the above, our due diligence includes standard sourcing and contracting procedure to address modern slavery and human trafficking including contractual provisions in relevant vendor contracts. During sourcing, all vendors are required to sign off to acknowledge they have read and understood our [Supplier Code of Conduct](#). Our vetting process also includes specific due diligence questions related to modern slavery and human trafficking. 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.

In the next year we plan to expand our due diligence on vendors to screen them for potentially adverse information, including basic human rights related information, during the onboarding process.

We will continue to assess the risks associated with our supply chain and expand the scope of our focus as necessary.

Our Commitment (Goals and KPIs)

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, with the aim to achieving 100% compliance;
- Ensuring our handbook provides all employees with access to our statement and training materials;

- 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 integrating compliance requirements into a broader base of supplier assessments;
- Drafting and providing functional documentation for the various internal teams to highlight key areas of Modern Slavery compliance;
- Global expansion through our Code of Conduct;
- Reviewing and updating the whistleblower policy; and
- Implementing additional training for anti-corruption.

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 Protocol Group Limited (Parent Company; all others are wholly owned subsidiaries)
- Clive Agency (US)
- Clive Agency Limited (UK)
- Clive Agency (Ireland)
- FIRST Protocol Inc (US)
- FIRST PTE Limited (Singapore)
- FIRST Agency Limited (HK)
- FIRST Protocol Event Management Limited (UK)
- First Agency Creative Services Limited (UK)
- FIRST Agency Solutions Inc (US)
- FIRST Agency Solutions Limited (UK)
- FIRST Agency Solutions PTE Ltd
- FIRST Servicios De Eventos Ltda (Brazil)
- First Agency Solutions PTY Limited (Australia)
- FIRST Events Agency Ltd (Ireland) (Euro Zone Parent Company)
 - FIRST Events Agency Ltd (France Branch)
 - FIRST Events Agency Ltd (Belgium Branch)
 - First Events Agency Limited, Dublin, Zweigniederlassung Zürich (Switzerland Branch)
- First Agency Holdings Limited (UK)
- First Agency Solutions Holdings Limited (UK)
- FIRST Global Management Services Ltd (UK)

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- FIRST Global Management Services Inc. (US)

Signed and approved by:

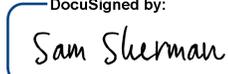
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Name: Edward Stanger

Title: Director

FIRST Group Board

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Name: Sam Sherman

Title: VP, Risk & Compliance Officer

Global Risk & Compliance Committee