

Statement: NEP Group, Inc. Modern Slavery

Implemented: June 2024
Next Review Date: May 2025

Related Policies: NEP Anti-slavery and Child Labour Policy

**U.S. Complaint Resolution Policy** 

**NEP Whistleblower Policy** 

**NEP Code of Ethics and Business** 

Conduct

#### Introduction

This statement sets out the steps that the NEP Group has taken to ensure that modern slavery and human trafficking are not taking place in our business or supply chains. This statement applies to all companies in the NEP Group unless they have chosen to produce their own statement.

This statement is made in accordance with the *Modern Slavery Act 2015* (UK), the *Modern Slavery Act 2018* (Cth) (Australia) and other Modern Slavery legislation in countries where NEP operates.

## **Our Organization's Structure & Operations**

NEP Group, Inc. is the parent company of an international group of companies offering a variety of equipment, services and media solutions to the broadcast and live event industries around the world. The extent of NEP Group's operations include amongst other things, outside broadcasts for live sports, studio production, host broadcast support, production services, streaming services, systems integration, centralized production and LED screens for indoor and outdoor events.

NEP is headquartered in the United States and has offices in more than 24 countries.

# **Our Supply Chains**

The global nature of the NEP Group's business means that our supply chain is extensive and varied. Where possible, we use preferred suppliers for both our equipment and services requirements, carrying out due diligence and seeking to include appropriate contractual terms in supply contracts.

# Risks of Modern Slavery Practices in our Operations and Supply Chains

NEP Group enters into contracts for the provision of goods and services and is in receipt of third-party services.

NEP Group recognises that certain suppliers in the equipment manufacturing sector are at a higher risk generally of utilizing forced labour practices, particularly given some of the offshore suppliers are in jurisdictions known for having a higher risk of modern slavery practices. It has though assessed its top ten suppliers and concluded that they are reputable suppliers of sophisticated services or highly technical equipment which would not be considered high risk.

# **Actions Taken to Assess and Address Risks of Modern Slavery**

The NEP Group is committed to continuing to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. It continues to do so, by implementing policies that are aimed at combating modern slavery. It is continually working towards and refining its processes for additional checks within the business including due diligence on relevant suppliers and training for relevant staff.

#### **Our Policy on Slavery and Human Trafficking**

The NEP Group is committed to continuing to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery policy, which has been in place since 2017, reflects our commitment to act ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls with a view to ensuring that there is no slavery or human trafficking anywhere in our supply chains. These aims are also supported by many of our other existing policies including those relating to ethical conduct and equality and diversity and by the annual modern slavery statement that has been published in the UK since 2017.

Indeed, in 2020 NEP released an update to the NEP Code of Ethics and Business Conduct Policy, NEP Bribery Policy, NEP Sanctions and Money Laundering Policy and a new NEP Competition Law Policy. Training on these Policies has been delivered by our Chief Compliance Officer and the compliance team. All of these Policies were also translated into relevant local languages. In addition, a NEP Whistleblowing Policy, with externally managed anonymous hotline, has been embedded to allow employees and third parties to anonymously report wrongdoing in complete confidence.

Furthermore, in 2022 NEP carried out work with its business in Australia to ensure compliance with Modern Slavery laws as well as other important integrity and compliance topics such as bribery, competition and publishing its first statement in June 2022.

In March 2023, the NEP Group implemented the 'NEP Legal Guide for Suppliers' ("Guide"). The Guide helps suppliers understand their obligations to the NEP Group and any and all of its subsidiaries when performing work for them. As part of the Guide, NEP Group requires all contractors, suppliers and business partners to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force at any part of that party's supply chain. The Guide also expressly sets out that suppliers, contractors and business partners must not support, engage or require any forced labour, the use of child labour, bonded labour, indentured labour and prison labour, and requires suppliers, contractors and business partners to report any possible occurrence of modern slavery, human trafficking or illegal labor practices to NEP (including by granting access to NEP's anonymous hotline).

In 2024 NEP commenced work on its Global Environmental, Social and Governance ("ESG") program. This will achieve compliance with the European Union Corporate Sustainability Reporting Directive ("CSRD") which will require detailed assessment of, and reporting on, metrics related to many ESG topics across CSRD, including workers in the supply chain. NEP is currently conducting its Double Materiality Assessment and identifying opportunities and risks. As this program is embedded in 2024 and 2025 it is anticipated that workers in the supply chain will be a key opportunity and lead to further due diligence on supply chains.

# **Future Developments**

The NEP Group is implementing its ESG program as described above and is continuing to develop additional policies, contractual requirements, procedures and training with a view to preventing modern slavery in its supply chain. We will continue to improve our due diligence procedures and to raise awareness of modern slavery among our colleagues and partners. We shall continue to reinforce our business ethics generally.

# Assessing Effectiveness of Actions Being Taken to Assess and Address the Risks of Modern Slavery Practices

The NEP Group is assessing this as part of its ESG program as described above.

### **Subsidiaries**

In the UK, NEP Group carries on business through NEP UK Limited, Creative Technology Limited, NEP Connect Limited, Bowtie Television Limited, NEP Broadcast Solutions UK Limited, Outside Broadcasting Services Limited, Lux Machina Consulting Limited, Halon Entertainment UK Limited, SOS Event Logistics

Limited, Sports Technology Limited, Creative Technology EME Limited, Fletcher London Limited, NEP UK Film I Limited and NEP UK & Ireland Group Limited.

In Australia, NEP Group carries on business through NEP-GTV HoldCo Pty Ltd and NEP Australia Pty Ltd.

#### Consultation

This statement has been prepared by NEP Group in consultation with the entities with whom we make this joint statement, being the UK and Australian subsidiaries listed above. Note however, for Australia, that NEP-GTV HoldCo Pty Ltd is a holding company and does not enter into contracts for the provision or receipt of goods and services itself.

This statement is approved by the Chief Executive Officer.

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Martin Stewart

CEO

NEP Group, Inc.

Date: