

ENGINE GROUP

Engine Modern Slavery and Human Trafficking Statement

Engine Approach to Modern Slavery and Human Trafficking

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by selected entities of the Engine group of companies (“**Engine**”) during the financial year ending 31 December 2020 to prevent modern slavery and human trafficking in its business and supply chains.

Engine in the United Kingdom

Engine Holding LLC has a number of individual specialist companies operating in the United Kingdom including The Engine Group Limited; Engine People UK Limited; Fuel Data Strategies Limited; Engine Media, LLC; ORC Holdings, Ltd; Engine Transformation Ltd; ORC European Information Centre Limited; MHP Communications (H.K.) Limited; and Engine Partners UK LLP which operates a number of trading divisions including Engine Creative, Engine Communications (including Engine MHP and Engine Mischief) and Engine Transformation.

Engine Business, Supply Chains and Commitment

As a digitally-focused independent advertising and communications network our suppliers are focussed on areas such as film production, photography and strategic consultancy and creative/digital artists. We also have supply agreements for the use of routine technical support services for IT systems, data storage and archiving, telephony and communications infrastructure, credit referencing, print services, professional and management support services.

We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

Engine is aware that we must be conscious of the working conditions and other practices used within our supply chains. We make sure that we base our supplier selection on an objective and fair criteria that include consideration of environmental, social and ethical performance.

We endeavour to comply with all national and international laws, trade restrictions, embargoes, sanctions and regulations that apply to the work we do. We are committed to respecting the dignity, liberty and equality of everyone we work with. This includes maintaining an interest in the business practices used by companies and business partners that supply goods or services to us.

Engine understands the importance of eliminating modern slavery and human trafficking and ensuring supply chains are free from such activity and so we act as an advocate for responsible supply chain practices within our industry sector. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our businesses.

Policies, Ethical Trading and Due Diligence

As part of our initiative to identify and mitigate risk we operate a range of policies and procedures appropriate to our businesses which all staff are trained on in their induction. These include policies and procedures in relation to Anti-slavery and Human Trafficking. These are reviewed and updated when necessary.

In exercising supplier due diligence, we use a risk based approach to ensure we focus on those areas where the risk is greatest and maximum impact can be achieved.

Engine will work to remedy any areas in which suppliers do not meet our standards or do not comply with relevant regulations. This may ultimately include ceasing trade with suppliers who show persistent disregard for important elements of environmental, social or ethical performance or that do not meet our internal criteria for selection.

Engine incorporates express contractual obligations within our standard terms and conditions of business with regard to modern slavery and human trafficking requiring those we work with to comply with the law.

Engine operates a Whistleblowing Policy, demonstrating our commitment to reducing any unethical practices in the workplace. This policy facilitates an independent reporting service available to all employees, officers, consultants, contractors, casual workers and agency workers who may experience or witness dishonest or unethical behaviour, health and safety breaches, harassment, bullying or other forms of wrongdoing.

This statement was approved on behalf of Engine Media, LLC by:

Lawrence J. Diamond

[Lawrence J. Diamond \(Sep 8, 2020 09:24 EDT\)](#)

Lawrence Diamond
Group Chief Financial Officer

This statement was approved on behalf of The Engine Group Limited by:

Lawrence J. Diamond

[Lawrence J. Diamond \(Sep 8, 2020 09:24 EDT\)](#)

Lawrence Diamond
Director

This statement was approved on behalf of Engine People UK Limited by:

Lawrence J. Diamond

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Lawrence Diamond
Director

This statement was approved on behalf of Fuel Data Strategies Limited by:

Lawrence J. Diamond

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Lawrence Diamond
Director

This statement was approved on behalf of ORC Holdings, Ltd

Lawrence J. Diamond

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Lawrence Diamond
Director

This statement was approved on behalf of Engine Transformation Ltd

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Director

This statement was approved on behalf of ORC European Information Centre Limited

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Lawrence Diamond
Director

This statement was approved on behalf of Engine Partners UK LLP by:

James Moffat

Jim Moffat
Chief Executive Officer Europe & Asia Pacific