



Policy Title: **Anti-slavery and Child Labour Policy**  
Policy Owner: **Sr. VP of Human Resources**  
Department: **Human Resources**  
Implemented: **May 23, 2017**  
Revised Date:  
Related Policies: **U.S. Complaint Resolution Policy**  
**Regional Whistleblower Policies**

## 1. **POLICY STATEMENT**

- 1.1 NEP Group, Inc. (“the Company”) strives to create a workplace that complies with all applicable employment and labour laws in each of its business locations, including all applicable laws and best practices pertaining to slavery and/or child labour. This Anti-slavery and Child Labour Policy (“Policy”) is a key component in achieving this responsibility.
- 1.2 This Policy applies to the Company and to each of its subsidiary companies and undertakings from time to time (“NEP” or the “Group”). The Company is the parent 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. Headquartered in the United States, the Group has offices in more than 20 countries.
- 1.3 Modern slavery and child labour, which involves the employment of children below the legal minimum age of work pursuant to applicable law, are crimes and a violation of fundamental human rights. These violations occur in various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which involve the deprivation of one person’s liberty by another in order to exploit him/her for personal or commercial gain. NEP has a zero-tolerance approach to modern slavery and child labour. NEP is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and child labour is not taking place anywhere in the Group’s own businesses or in any of its supply chains.
- 1.4 NEP is also committed to ensuring that there is transparency in its own business and in the Group’s approach to prohibiting modern slavery and child labour throughout its supply chains. NEP expects the same high standards from all of its contractors, suppliers and other business partners. As part of its contracting processes, NEP seeks to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and NEP expects that its suppliers will hold their own suppliers to the same high standards.

## 2. SCOPE

- 2.1 This Policy applies to all persons working for NEP or on NEP's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. The application of this Policy to contractors and other third parties is in order to promote human rights and for workplace health and safety reasons and does not create or imply an employment relationship in any manner.
- 2.2 This Policy does not form part of any employee's contract of employment. NEP reserves the right to amend this Policy at any time.

## 3. RESPONSIBILITIES/ENFORCEMENT

- 3.1 The Company's Chief Compliance Officer, who reports to the Board, has overall responsibility for ensuring this Policy complies with NEP's legal and ethical obligations and for monitoring overall compliance with it, including auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.2 The Company's Chief Compliance Officer and Senior VP HR have primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and dealing with any queries about it.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given training as necessary on it and the issue of modern slavery in supply chains.
- 3.4 Employees may direct comments, suggestions and queries to their manager or a member of the Human Resources Department.

## 4. COMPLIANCE WITH THE POLICY

- 4.1 All employees and suppliers must ensure that they have read, understand and comply with this Policy.
- 4.2 The prevention, detection and reporting of child labour and modern slavery in any part of NEP's business or supply chains is the responsibility of all those working for or with the Company. Employees and suppliers are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 4.3 Employees must notify their manager and suppliers must notify their principal NEP contact as soon as possible if they believe or suspect that a breach of or conflict with this Policy has occurred or may occur in the future.

- 4.4 Employees and suppliers are encouraged to raise concerns about any issue or suspicion of modern slavery or child labour in any parts of NEP's business or supply chain at the earliest possible stage.
- 4.5 Without prejudice to any other rights and remedies of NEP, if NEP is notified of an actual or potential breach of this Policy within its supply chain, NEP will, where appropriate and with the welfare and safety of local workers as a priority, give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 4.6 If an employee or supplier is unsure about whether a particular act, the treatment of workers more generally, or his/her working conditions within any tier of NEP's supply chains constitutes any of the various forms of modern slavery or whether child labour may be occurring, the matter should be addressed in the case of an employee with their manager or in the case of a supplier with their principal NEP contact.
- 4.7 NEP aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. NEP is committed to ensuring that no one, who reports in good faith and not with a view to personal gain their suspicion that modern slavery or child labour is or may be taking place in any part of the Company's business or supply chain, should suffer any detrimental treatment as a result. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that he/she has suffered any such treatment, he/she should inform his/her manager immediately. If the matter is not remedied, the employee should raise the issue to the next level of management, to the Human Resources Department, or as otherwise designated in the NEP country/region specific Complaint Resolution or Whistleblower Policy

## **5. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 5.1 This Policy is published in the Company's online global policy library which is accessible by all employees. Periodic awareness communication about this Policy is conducted with employees worldwide.
- 5.2 NEP's zero-tolerance approach to modern slavery and child labour must be communicated to all suppliers, contractors and business partners at the outset of the Company's business relationship with them and reinforced as appropriate thereafter.

## **6. BREACHES OF THIS POLICY**

- 6.1 Subject to applicable law in each NEP location, any employee who breaches this Policy will be subject to disciplinary action, up to and including dismissal for misconduct or gross misconduct.

FOR US EMPLOYEES ONLY: Nothing in this policy is intended to create or imply a contract of employment for a particular term, or modify any employee's employment status, which will continue to be at-will.

NEP may terminate its relationship with other individuals and organisations working on NEP's behalf if they breach this Policy.

7. **APPROVAL**

Approval for initiation of this Policy has been given by:

*[Signature]* 5-23-17  
General Counsel and Chief Compliance Officer Date

*[Signature]* 5-23-17  
Senior Vice President of Human Resources Date

Approved by NEP Board of Directors: **May 23, 2017**

8. **REVISION HISTORY**

Date	Revision Summary (begin with Section Number/Title)