



**MODERN SLAVERY  
POLICY  
STATEMENT**



## **I. MODERN SLAVERY POLICY STATEMENT**

This modern slavery statement (“Statement”) is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that [INVNT GROUP]® (“INVNT”) has taken and is continuing to take to ensure that modern slavery or human trafficking (“Modern Slavery”) is not taking place within our business or supply chain.

Modern Slavery means:

- human trafficking;
- forced work;
- mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse;
- being dehumanised, treated as a commodity, being bought, or sold as property; and
- being physically constrained or to have restriction placed on freedom of movement.

INVNT has a zero tolerance approach to any form of Modern Slavery and is committed to acting ethically, with integrity, and transparently in all business dealings. We also are dedicated to putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within the business or our supply chain.

## **II. BUSINESS ACTIVITIES**

INVNT is a portfolio of agencies, which specialise in brand strategy, culture consulting, and brand content. INVNT’s services include creating immersive campaign experiences by offering an integrated production services division – owning end-to-end control over quality and cost. The portfolio includes: (i) [INVNT GROUP], a modern brand strategy firm; (ii) Folk Hero, a creative-led culture consultancy; (iii) Meaning, a brand content studio and content marketing agency; (iv) HEVĚ, a collegiate events and experiences agency; and (v) INVNT Higher Education and INVNT, a live brand storytelling agency.

Our headquarters are in New York, United States, we operate in five countries, and we employ just over 100 employees worldwide. INVNT operates in Australia (13 employees), Singapore (eight employees), Sweden (one employee), United Kingdom (five employees), and the United States (97 employees).

## **III. RESPONSIBILITIES**

We confirm that we are not aware of any Modern Slavery in any part of our businesses. INVNT understands that this requires an ongoing review of both its internal practices in relation to its employees and its supply chains.

INVNT does not enter into business with any organisation, which knowingly supports or is found to involve itself in slavery, servitude, and forced or compulsory labour. Additionally, INVNT strictly adheres to the required standards under the relevant employment legislation in all the jurisdictions where INVNT operates, and in many cases exceeds those required standards in relation to its employees.

#### IV. DUE DILIGENCE AND RISK ASSESSMENT

To ensure that no Modern Slavery is taking place within the INVNT's businesses, INVNT will:

- ensure that all its employees are legally employed;
- ensure all employees are paid the minimum wage and have the right to work;
- ensure working conditions are safe and hygiene;
- ensure working hours are not excessive;
- share knowledge and improve understanding among our workforce; and
- publish this Statement on INVNT's website for public access.

#### V. OUR COMMITMENT

##### A. Policies and Procedures

This Statement supports INVNT's anti-harassment, sexual harassment, protected class harassment, investigation, retaliation, corrective action, code of ethics, equal employment opportunity, immigration and employment, workplace violence prevention, diversity, safety and security, conflicts of interest, confidentiality, social media, employee conduct and discipline, grievances, and procurement policies. Additionally, this Statement ensures INVNT conducts eligibility work checks for all employees to safeguard against Modern Slavery or individuals forced to work against their will.

INVNT's policies and procedures are contained in INVNT's handbook ("the Handbook"). INVNT's Handbook makes clear that we are committed to ensuring there is no form of unethical conduct in any part of our business. The Handbook contains INVNT's policies and procedures, cultural expectations, structure, employment benefits, employment working hours, and holidays. Our employees are responsible for complying with our policies and procedures in the Handbook. Violation of the policies and procedures is subject to discipline, up to and including termination.

In addition, INVNT conducts training sessions for the employees to understand and comply with the company's anti-harassment and discrimination policies. The training sessions provides an overview of policies, as well as, providing [forums](#) and a helpline at (1-877-236-7703).

##### B. Ethics and Compliance

The Handbook instructs employees to immediately report any concerns about any issue or suspicion of wrongdoing to Laura Forgea, the Director of Human Resources at [lforgea@invnt.com](mailto:lforgea@invnt.com), Kristina McCoobery, the Chief Operating Officer at [kmccoobery@invnt.com](mailto:kmccoobery@invnt.com), or Michael Roy, General Counsel at [mroy@invnt.com](mailto:mroy@invnt.com). The Handbook contains a complaint form for employees to report any issues, concerns, or suspicions of unethical conduct.

No reprisal or retaliatory action will be taken against any employee for raising concerns. INVNT will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

We encourage our employees, suppliers, subcontractors, and other third-party business partners to ask questions about our Handbook.

This Statement, including translations, can be found via INVNT's intranet, or on our website.

## **VI. OUR PERFORMANCE INDICATORS**

We will know the effectiveness of the steps that we are taking to ensure that Modern Slavery is not taking place within our business or supply chain, if no reports are received from employees, the public, or law enforcement agencies, to indicate that Modern Slavery practices have been identified.

## **VII. APPROVAL**

This Statement was approved by the Board of Directors on February 15, 2022.

For and on behalf of:

  
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Kristina McCoobery

Chief Operating Officer

February 15, 2022