



SPHERE GROUP

GLOBAL PARTNERSHIPS.
LOCAL DEVELOPMENTS.

MODERN SLAVERY ACT POLICY

1 September 2025

1. POLICY STATEMENT

It is the policy of Sphere and every subsidiary within the group (together **"Sphere"**) to conduct business in an honest and ethical manner.

Sphere will uphold all laws relevant to the Modern Slavery Act in all the jurisdictions in which it conducts business, including, in the UK, the Modern Slavery Act 2015 (**"the Act"**), in respect of our conduct both at home and abroad.

Sphere takes a zero-tolerance approach to modern slavery and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates. Sphere will not knowingly conduct business with clients, consultants, contractors, suppliers or other agents or representatives that do not support appropriate anti-slavery objectives.

2. SCOPE

This policy applies to any person who performs services for Sphere including but not limited to company directors, senior managers and all other employees (whether permanent, fixed-term or temporary) working at all levels and grades, consultants, contractors, agency staff, volunteers, interns, agents, sponsors and joint venturers.

This policy exists to set out the responsibilities of Sphere and its employees in regard to observing and upholding our zero-tolerance position on modern slavery. The policy acts as a source of information and guidance for those working for Sphere and helps them recognise and deal with modern slavery issues, as well as understanding their responsibilities.

In this policy, **"Third Party"** means any individual or organisation that we come into contact with during the course of work and the running of Sphere's business, and includes actual and potential clients, funders, joint venture partners, intermediaries, referrers of work, suppliers, consultants, contractors, distributors, business contacts, agents, advisers, government and public bodies (including their advisers, representatives and officials), politicians and political parties.

3. TRAINING AND AWARENESS

We have a group wide policy for our staff confirming that Sphere has a zero tolerance approach to any form of modern slavery and human trafficking. This is reviewed annually and published on our website, so is available at all times. All new members of staff are made aware of this policy.

We continue to check that directly employed staff are eligible to work in the UK, using the appropriate and approved government checklist of documentation. Further training is available, for all our staff, which includes awareness of the Modern Slavery Act. We will also raise awareness through our internal communication channels of the basic principles of the Modern Slavery Act 2015, how employers can identify and prevent slavery and human trafficking and the external help that is available.

4. DUE DILIGENCE AND RAISING CONCERNS

We will not tolerate or condone any form of exploitation and will act promptly where any breach of the Act has been identified. We will take appropriate steps against Third Parties who do not meet the required standard for example by asking them to take action to improve or terminating the business relationship if the required improvement is not forthcoming.

Employees can notify Sphere's Managing Director to report any breach of our legal obligations, including those contained in the Act or contact the confidential and anonymous Modern Slavery helpline (<https://www.modernslaveryhelpline.org>).

5. SUPPLY CHAIN

Whilst we have thorough due diligence processes in place for managing both new and existing Third Party relationships, we continue to regularly review these to ensure that the intention and requirements of the Act are addressed. Working with our Third Party partners we ask that they provide us with the assurance that, modern slavery is understood and not present in their company and wider supply chain. We want to make sure that safe and fair working conditions are provided and we require that those in our Third Party have policies, procedures, practices and contracts within their organisations and with their own suppliers to equally reflect this.

Sphere regularly reviews the Third Parties with whom it enters into relationship, focusing closely on those we consider to be at the greatest risk, including suppliers; who operate by employing casual or temporary labour. They need to demonstrate to us, full compliance with this policy.

We have reviewed the standard order documents that we use to engage with our Third Party to assess and manage any risk, as far as is reasonably practicable. To support our approach further all of our subcontract orders and purchase orders have an appropriate paragraph included as standard, regarding the Act with requirements to, if and as required to do so by the Act, publish Transparency Statements and provide to us any information, records or assistance within the power or possession of the Third Party in relation to any reasonably suspected offence under the Act.

If any Third Party is aware of any activity which might lead to, or suggest, a breach of this policy, they should raise their concerns with Sphere's Managing Director.

6. MONITORING AND REVIEW

This policy is regularly reviewed by Sphere's Managing Director to ensure its effectiveness, suitability and adequacy and it may be amended at any time.

End



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