

**WASSERMAN (CSM) HOLDINGS LIMITED**  
**SLAVERY AND HUMAN TRAFFICKING STATEMENT**  
**FOR FINANCIAL YEAR ENDED 31<sup>ST</sup> DECEMBER 2023**

**Introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”).

Companies in the Wasserman (CSM) Holdings Limited group (the “Group”) that are required to issue this statement for the financial year ended 31 December 2023 are Wasserman EMEA LLP (formerly CSM Sport and Entertainment LLP) (together “we”, “our”).

It continues to be a priority for the Group to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We set ourselves high standards in our business practices and expect businesses we work with to meet the same level of business ethics. We do not tolerate any form of modern slavery or human trafficking in any part of our business and are committed to carrying on our business in a manner which respects the rights of individuals in the communities in which we operate. We have taken and are continuing to take steps to ensure that our businesses identify risk areas in their supply chains and to implement policies and procedures to eliminate those risks.

The Directors of Wasserman (CSM) Holdings Limited (the “Board”) are responsible for overall strategic direction, including ensuring that systems of identification and management of risk, including the risk of slavery and human trafficking in our business or supply chain, are robust and appropriate.

Our People, Legal and Finance teams verify compliance with our operational standards and report directly to the Board.

**Our Organisation’s Business and Structure**

The Group operates at the epicentre of sports, music, entertainment and culture, serving talent, brands and properties on a global scale. Until 30 September 2023 we were part of Chime Group Holdings Limited at which point the Group was acquired by Wasserman Media Group, LLC (the “Parent”), registered in Delaware, USA. We have over 1200+ employees worldwide and operate in the following countries:

- United Kingdom
- United States of America
- France
- Spain
- Germany
- United Arab Emirates
- Qatar
- Kingdom of Saudi Arabia
- Hong Kong

- Singapore
- Australia

Wasserman operates at the epicentre of sports, music, entertainment and culture, serving talent, brands and properties on a global scale. Headquartered in Los Angeles, Wasserman's presence spans 27 countries and more than 66 cities, including New York, London, Abu Dhabi, Amsterdam, Hong Kong, Madrid, Mexico City, Toronto, Paris and Sydney. For more information, please visit [www.teamwass.com](http://www.teamwass.com).

Whilst our businesses engage with a broad range of suppliers globally, we do not consider that our supply chain is high risk for the reasons set out in the following assessment.

### **Our Supply Chains**

We have assessed our supply base with a view to identifying high risk suppliers or areas for focus. This assessment included mapping by agency, category, spend and geography.

Suppliers used by the Group were identified as typically falling within the following categories: professional services, logistics, delivery, venue hospitality, event production services, transport and travel, cleaners and maintenance. Goods that we purchase include items such as raw material for print, merchandise, utilities and general office equipment.

Overall, whilst the risk assessment demonstrated that most of the Group's primary tier suppliers are in low-risk territories, we recognise the challenges of delivering services for clients outside of our domiciled countries.

As such, we undertake due diligence prior to working with new suppliers and regularly review existing suppliers.

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

Responsibility for our anti-slavery initiatives is managed across our core support teams:

- **Policies:** People, Legal, Finance.
- **Risk assessments:** People, Legal, Finance.
- **Investigations/due diligence:** People, Legal.
- **Training & Development:** People, Legal, Finance.

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

The following policies describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. All policies can be accessed across the Group:

- **Responsible Business Code** Sets out the core principles by which we operate including compliance with all laws and regulations, high ethical standards, respecting human

rights, consideration of reputational and sustainability risk and the absence of any form of discrimination.

- **Staff Code of Conduct** Details the behaviour and ethical standards expected of all employees (including contractors, consultants, agency workers and business partners) globally.
- **Responsible Sourcing Policy** Outlines the eight principles that are expected of our suppliers founded upon the UN Guiding Principles on Business and Human Rights, the UN Global Compact.
- **Know your Client Policy** Summarises the minimum requirements expected of colleagues when undertaking due diligence on prospective clients.
- **Whistleblowing Policy** Sets out our commitment to working in an open and honest way where all our people feel able to raise any concerns in a supportive environment and our frameworks for them to do so, extending to include an independent whistleblowing service where people can confidentially report their concerns.
- **Anti-Bribery Policy** Outlines our zero tolerance approach to bribery in any form together with responsibilities and training.

### **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk, we use a centralised onboarding process which is managed by our Shared Service Centre whereby all new suppliers are required to satisfy due diligence, including their confirmations that:

- They pay the “living wage” or local equivalent;
- Employees have the right to work;
- They address Health and Safety Risks and monitor compliance with applicable laws;
- They have measures in place to ensure no discrimination as a result of protected characteristics in their country;
- They protect confidential data and personal data belonging to others;
- That employees/workers and their contractors comply with international human rights and labour standards;
- That they monitor and mitigate the risk of modern slavery; and
- That they address Bribery and Corruption risks.

In addition, suppliers must provide confirmation of banking details together with insurances appropriate to the nature of services or goods being supplied.

All new suppliers are also subject to an assessment through a leading compliance tool which allows us to access data from a wide range of sources globally.

Through investment in technology (in particular in financial management systems and compliance software) we have been able to monitor our supply chain more effectively.

This has enabled our businesses to procure suppliers more efficiently and enabled the Group to reduce the number of suppliers it buys from. This will enable us to better understand both our primary tier supply chain and also the source of supplies further down our chain and to provide assurance, to our clients and stakeholders.

## **Our Effectiveness in Combating Slavery and Human Trafficking**

Based on the information above, we consider that our policies and procedures substantially mitigate the risk of modern slavery and human trafficking in our supply chain.

We recognise the need to prioritise transparency throughout our supply chains and we implement due diligence measures across all of our suppliers, including using technology (in particular in financial management systems and compliance software) to monitor our supply chain more effectively.

We also adhere to responsible recruitment practices following our established policies to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our business.

### **Next Steps**

Whilst we believe that there is limited risk in our primary tier suppliers, we recognise that there is still work to be done to better understand exposures further down the supply chain.

We are also conscious that whilst an IT driven centralised onboarding process provides consistency there are greater risks in some geographies.

We remain focussed on enhancing our understanding of those with whom we contract and ensuring that no form of forced labour or slavery is present in our supply chain.

The main focus for the year ahead is the integration of the Group into the wider Wasserman structure, reviewing processes and consolidating best practices for the future.

This statement has been approved by Wasserman (CSM) Holdings Limited Directors on 24<sup>th</sup> June 2024.



**Matthew Vandrau**  
Director

Dated 24<sup>th</sup> June 2024