

Ethical Business Statement

Anti-Bribery and Corruption Policy & Modern Slavery and Human Trafficking Statement
 Eventful Management GmbH
 Mühlhauser Feld 3, 85664 Hohenlinden, Germany
 Approved: January 2026 • Next review: January 2027

Field	Detail
Statement covers	Anti-Bribery and Corruption; Modern Slavery and Human Trafficking
Issued by	Eventful Management GmbH (Directors: Edwin Courts, John Cullen)
Applicable legislation	Gesetz zur Bekämpfung der Korruption (Germany); UK Bribery Act 2010; UK Modern Slavery Act 2015; EU Anti-Money Laundering Directives
Applies to	All directors, employees, freelancers and sub-contractors of Eventful Management GmbH
Date of issue	January 2026
Next review	January 2027

Eventful Management GmbH conducts its business with integrity, transparency and respect for the law. We have a zero-tolerance policy towards bribery, corruption and all forms of modern slavery and human trafficking. This statement sets out our commitments and the practical steps we take to uphold them.

Signed on behalf of Eventful Management GmbH:



Edwin Courts
Director



John Cullen
Director

Date: January 2026

Document Revision History

Date	Status
January 2026	Original document created and approved — current issue

Part 1 — Anti-Bribery and Corruption Policy

1.1 What this Policy Covers

This part of the statement sets out Eventful Management GmbH's policy on bribery and corruption. It applies to all directors, employees, freelancers and sub-contractors acting on behalf of the company, in all countries in which we operate.

Eventful Management GmbH has a zero-tolerance policy towards bribery and corruption in all its forms. We will not offer, pay, accept or authorise any bribe or corrupt payment, whether in cash or in any other form, to or from any person or organisation, for any purpose.

1.2 Relevant Legislation

Our anti-bribery policy is shaped by the following legislation:

- Gesetz zur Bekämpfung der Korruption — the primary German anti-corruption statute, covering bribery of public officials and in commercial settings
- Strafgesetzbuch (StGB) §§331–335 — German criminal code provisions on bribery of public officials
- StGB §§299–300 — German criminal code provisions on bribery in commercial transactions
- UK Bribery Act 2010 — applies where we have UK clients or conduct business with UK-connected parties; creates strict liability for failure to prevent bribery by associated persons
- EU Anti-Money Laundering Directives — applicable to financial transactions across member states

1.3 What Constitutes Bribery

Bribery is the offering, giving, receiving or soliciting of anything of value in order to improperly influence a decision or action. For the purposes of this policy, bribery includes:

- Offering or paying money, gifts, hospitality, entertainment or any other benefit to a person in exchange for a business advantage
- Accepting such an offer or payment from a client, supplier, sub-contractor or any other party
- Authorising or facilitating a bribe by a third party acting on behalf of the company, including agents, intermediaries and joint venture partners
- Making or receiving “facilitation payments” — unofficial payments to public officials to speed up or secure routine actions — which are prohibited under this policy regardless of local custom or practice

1.4 Gifts and Hospitality

We recognise that the offering and receiving of reasonable gifts and hospitality is a normal part of business relationship-building. The following principles apply:

- Gifts and hospitality offered to or received from clients, suppliers or other business contacts must be reasonable in value, infrequent, openly given and received, and must not be intended to improperly influence a business decision
- Gifts of significant monetary value must not be offered or accepted without the prior approval of a director; as a general guide, gifts valued at more than €50 require approval
- Cash gifts must never be offered or accepted under any circumstances
- Gifts and hospitality must never be offered to or accepted from public officials (Amtsträger) or their families without specific director approval and documentation
- Any gift or hospitality that creates or could be perceived to create an obligation or conflict of interest must be refused and reported to a director

1.5 Our Commitments

In pursuit of this policy, Eventful Management GmbH commits to:

- Never offering, paying, accepting or facilitating a bribe or corrupt payment in any form, in any jurisdiction
- Conducting due diligence on agents, intermediaries and key business partners to assess bribery and corruption risk before and during engagement
- Including anti-bribery requirements in contracts with sub-contractors, suppliers and agents where appropriate
- Maintaining accurate books and records that fairly reflect all transactions; no off-the-books accounts or unrecorded payments will be made or accepted
- Providing guidance to all employees and sub-contractors on recognising and avoiding bribery risk
- Taking prompt and proportionate action in response to any actual or suspected breach of this policy

Part 2 — Modern Slavery and Human Trafficking Statement

2.1 About this Statement

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015, which requires certain organisations to publish an annual statement on the steps they are taking to ensure that slavery and human trafficking are not present in their business or supply chain. Although Eventful Management GmbH is a German-registered company, we supply services to UK-based clients and operate in the UK market, and we voluntarily commit to compliance with the spirit and requirements of the Act.

This statement covers the financial year ending December 2025 and was approved by the directors in January 2026.

Eventful Management GmbH has zero tolerance for modern slavery, forced labour, child labour and human trafficking in any part of our business or supply chain. We are committed to acting ethically and with integrity in all our business relationships.

2.2 Relevant Legislation and Definitions

Modern slavery is a serious crime and a grave violation of fundamental human rights. It takes a number of forms, all of which are prohibited under this statement:

- Slavery: the exercise of powers of ownership over a person
- Servitude: the obligation to provide services imposed by coercion
- Forced or compulsory labour: work or services extracted under threat of a penalty, where the person has not offered themselves voluntarily
- Human trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, force, coercion, deception or abuse of power, for the purpose of exploitation
- Child labour: the employment of children below the minimum legal working age, or in conditions that are harmful to their health, safety or development

2.3 Our Business and Supply Chain

Eventful Management GmbH is a specialist event production and scenic construction company based in Bavaria, Germany, with operations across Europe. Our workforce consists of a small number of permanent employees supplemented by freelance technicians, craftspeople and sub-contractors engaged on a project basis. Our supply chain includes:

- Materials suppliers — timber, sheet materials, metals, paints and finishing products, primarily sourced from German and European suppliers
- Technical equipment suppliers and hirers — lighting, audio-visual and staging equipment
- Logistics and transport providers
- Venue and catering contractors engaged on behalf of clients
- Freelance technicians and specialist trades engaged for specific events and projects

We consider our overall exposure to modern slavery risk to be relatively low, given that our operations are conducted primarily in Germany and the EU with established suppliers. However, we recognise that no supply chain is entirely risk-free, and we take active steps to identify and address any risks that arise.

2.4 Due Diligence and Risk Assessment

We take the following steps to identify and manage the risk of modern slavery in our business and supply chain:

- Supplier evaluation: we assess the employment practices and ethical standards of key suppliers and sub-contractors before engagement, with preference given to those with demonstrable ethical business practices
- Contractual requirements: our standard terms with sub-contractors and suppliers include requirements to comply with applicable employment law and to prohibit forced labour, child labour and human trafficking
- Geographic risk awareness: we are alert to higher-risk sourcing geographies and apply additional scrutiny to supply chains involving goods from countries with elevated modern slavery risk
- Employee engagement: all employees and regular sub-contractors are made aware of this statement and the right to raise concerns without fear of retaliation
- Workforce conditions: we verify that all freelancers and sub-contractors we engage directly are legally permitted to work, are paid at or above the applicable minimum wage, and are working voluntarily

2.5 Our Commitments

- We will not knowingly engage any supplier, sub-contractor or partner who uses forced labour, child labour or human trafficking in any part of their operations
- We will review this statement annually and update our due diligence practices in response to identified risks or emerging guidance
- We will investigate any concern raised about modern slavery in our business or supply chain promptly and in good faith
- We will co-operate fully with any lawful investigation by a competent authority into modern slavery concerns connected with our business

Part 3 — Reporting, Training and Review

3.1 Reporting Concerns

Any director, employee, freelancer or sub-contractor who suspects or becomes aware of a breach of this statement, or who is offered or asked for a bribe or encounters any practice that may constitute modern slavery, must report it immediately.

Reports should be made to a director in the first instance:

Contact	Details
Edwin Courts, Director	munich@eventful-management.eu • +49 (0)89 90 13 98 68
John Cullen, Director	munich@eventful-management.eu • +49 (0)89 90 13 98 68

All reports will be treated seriously, investigated promptly and handled confidentially. No person who raises a concern in good faith will suffer any detriment or retaliation as a result. Where a concern involves suspected criminal conduct, the company will report it to the appropriate law enforcement authority.

Suspected instances of modern slavery involving immediate risk to a person's safety should be reported to the emergency services (Germany: 110 police / 112 emergency; UK: 999) and to the relevant national authority (Germany: Bundeskriminalamt; UK: National Crime Agency / Modern Slavery Helpline 0800 0121 700) without delay.

3.2 Consequences of Breach

Any director, employee, freelancer or sub-contractor found to have breached this statement will face disciplinary action up to and including termination of employment or engagement. Where the breach involves criminal conduct, the company will report the matter to the competent authorities and will co-operate fully with any resulting investigation or prosecution.

Any supplier or sub-contractor found to be in breach of the anti-bribery or modern slavery requirements of this statement may have their contract terminated without notice.

3.3 Training and Awareness

Awareness of the risks of bribery and modern slavery is communicated to all relevant employees and sub-contractors as part of their induction and through periodic updates. Directors are responsible for ensuring that:

- All permanent employees are made aware of this statement and understand their obligations under it
- Freelancers and sub-contractors who may be exposed to bribery or modern slavery risk in the course of their work are briefed appropriately
- Any employee with significant procurement, commercial or supply chain responsibility receives specific guidance on recognising and managing bribery and modern slavery risk

3.4 Review

This statement is reviewed and approved by the directors at least annually, and immediately following any significant change to the company's operations, supply chain or applicable legislation. The current issue is effective from January 2026 and covers the financial year ending December 2025.

Approved on behalf of Eventful Management GmbH:



Edwin Courts
Director



John Cullen
Director

Date: January 2026