

# Anti-Slavery & Human Trafficking Policy

Modern slavery (including forced labour & human-trafficking) is a criminal offence under the Modern Slavery Act 2015 (the “Act”) and can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

Across our global operations, we have a zero-tolerance approach to modern slavery. We are committed to the highest standards of ethics and business conduct in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere within our own businesses or those of our suppliers.

## Our Approach

- We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We communicate our zero-tolerance approach to our suppliers and expect them to hold their own suppliers to the same high standards.
- All our team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. We aim 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. We are committed to ensuring no-one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:
  - Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
  - Engage with our suppliers both to convey to them our ‘Modern Slavery’ Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
  - Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

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## Our Leaders

Our leaders take responsibility for the prevention of modern slavery, by ensuring this policy statement and its' implementation comply with our legal and ethical obligations. Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

We are committed to continuing to address and minimise the risk of modern slavery within our business and supply chain we will not knowingly support or do business with any organisation that is involved in such practices.



Victoria Woodings

CEO

January 2024

# Anti-Slavery & Human Trafficking Policy

Principle are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Principle has an 'Anti-Slavery & Human Trafficking Policy' which details our commitment and the steps we take to prevent modern slavery.

## About Us

We're a global brand and implementation consultancy. The only company that combines brand strategy, experiences, design and implementation to deliver real change. We help brands realise their potential and purpose by helping them to be more relevant and compelling, stand out in their sectors and beyond, engage and build advocacy with customers, employees & stakeholders and gain an edge through strategic, well-managed implementation.

## Our Global Reach

### Americas

New York  
Knoxville  
Mexico City  
Rio De Janeiro

### Middle East & Africa

Dubai  
Cape Town

### Asia Pacific

Singapore  
Brisbane  
Mumbai  
Seoul  
Shanghai  
Tokyo

### UK & Europe

London  
Huddersfield  
Milan  
Madrid  
Munich  
Paris  
Copenhagen  
Vienna  
Warsaw  
Istanbul



70+

In-Country Field Teams

## Risk Review

Our Group Risk Register is reviewed regularly and the following risks have been identified that relate to modern slavery.

Risk	Rating	Mitigation Actions	Rating after mitigation
Using suppliers that have not been vetted	High	The vetting of all suppliers is managed through our in-house developed supplier management database, the 360 portal. Suppliers that are required to produce annual statements are asked to upload to our portal as part of the vetting process. All suppliers are required to sign up, annually, to our commitments which are detailed below. We are moving our supplier verification process to Safe Contractor and will be introducing sustainability assessments for some of our key suppliers.	Low
<p><b>Commitments</b></p> <p>“We will abide by applicable employment standards, labour, non-discrimination and human rights legislation. We will be able to demonstrate that child labour is not used, discrimination and harassment are prohibited, employees are free to raise concerns and appropriate background screenings are carried out”.</p> <p>We have read Principle’s Anti-Slavery and Human Trafficking Policy and commit to supporting your zero tolerance approach to modern slavery. We will report any breaches or potential breaches to Principle.</p>			
Leverage in buying power which pushed the purchasing price so low, which could result in labour being paid below the minimum wage	Low	This is managed through our Supply Chain strategy which details our approach to working with manufacturing suppliers and how they will be managed (e.g. engagement, forums, audits).	Low
Reduced lead time that our vetted supply chain cannot meet, resulting in increased labour potentially being paid below the minimum wage	Low	Working with suppliers to understand the capacity which is reviewed on a regular basis (e.g. engagement, forums, audits). We also work with our clients to ensure that the correct lead times are in place during the set-up of a programme.	Low

## Policies & Procedures

We operate several policies across our business which are relevant to addressing modern slavery risk, including:

- Responsible Business Policy statement
- Equal Opportunities Policy
- Whistleblowing Procedure
- Training Procedure
- Recruitment Policy
- Complaints Procedure

### Training

We conduct training across the business so that our colleagues understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### Legislation

As part of our quality arrangements we hold a legislation register which details how we comply with legislation that is relevant to our business.

### Performance

Our targets to monitor the effectiveness of our arrangements are:-

- No validated reports of modern slavery received from clients, law enforcement agencies, our employees and our supply chain

We are pleased to report that to date we have received no reports.

This statement has been reviewed in January 2024 and is compliant with the Modern Slavery Act 2015.