

# MODERN SLAVERY STATEMENT

VERSION	DATE	COMMENTARY
1.0	12.01.2024	Original Policy

This statement is made pursuant to Section 54 (Transparency in supply chains) of the Modern Slavery Act 2015 and covers the financial year from 1st August 2023 – 30th July 2024. This statement has been signed and endorsed by Lurna Woods, CEO of Tigerbond Group Ltd (TGL), and sets out the steps that TGL has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Tigerbond Group Ltd. has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

## OUR BUSINESS

Tigerbond is an integrated, full service marketing communications business with teams across the UK working across our office portfolio and from home.

Our footprint extends from Belfast, Glasgow, Leeds and Manchester to our HQ in London.

Our services include the delivery of:

- PR and reputation management
- Digital marketing
- Social media
- Web design and build
- Design and branding

We are expert advisors with impeccable credentials and a client list that includes some of the biggest names in British business and industry.

## OUR PROMISE

We're passionate about our people's happiness and growth, caring for the planet and supporting our communities.

That's why Tigerbond is a force for good, through the people we employ, the work we create, the suppliers we partner and the causes we support.

We are committed to creating a more diverse, equitable and inclusive workplace and demonstrate our progress not with words, but through continual, substantive change and accountable action.

That's our Tigerbond promise.

## **OUR POLICIES**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our company. Our commitment to acting ethically and with integrity in all our company relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. All internal documentation is held on our management system which is available to all employees.

### **These include for example:**

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our company or supply chain, without fear of reprisals.
3. Our Tigerbond values make it very clear to employees the actions and behaviour expected of them when representing Tigerbond. We strive to maintain the highest standards of employee conduct and ethical behaviour during the employment of an employee.

## **OUR SUPPLIERS**

We have zero tolerance to slavery and human trafficking. To ensure our supply chain and contractors comply with our values and ethics, we have in place a rigorous selection process which help ensure our suppliers and their supply chains are slavery free.

We encourage anyone, including colleagues, subcontractors, suppliers, customers and clients to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking.

We conduct a Supplier Questionnaire, that requires that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business;
2. They hold their own suppliers to account over modern slavery;
3. They pay their employees at least the national minimum wage / national living wage (as appropriate);

4. We may terminate the contract at any time should any instances of modern slavery come to light.

**TRAINING**

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

**MONITORING EFFECTIVENESS**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our company or supply chain by:

- Having zero reports received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Regular internal training sessions with all employees.
- Regular reminders to employees via company meetings and newsletters.

# MODERN SLAVERY POLICY

## ABOUT THIS POLICY

The following policy should be read in conjunction with our Modern Slavery Statement (above).

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas.

We expect high standards from all of our subcontractors, suppliers and other business partners and have made this a contractual term in our agreements with significant suppliers wherever possible.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## RESPONSIBILITIES

The Senior Leadership Team of the organisation has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

Our People Department has primary and day-to-day responsibility for implementing this policy, but those in roles involved in procurement should assist with reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.

## COMPLIANCE

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or People Department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are

encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our organisation or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the People Department, or report it in accordance with our Whistleblowing Policy as soon as possible.

Tigerbond encourages openness and will support anyone who raises genuine concerns in good faith in accordance with the organisation's whistleblowing 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 knowledge, or suspicion, that modern slavery is taking place in any part of our organisation or in any of our supply chains.

### **COMMUNICATION AND AWARENESS**

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We have an Ethical Sourcing Policy (ESP) which our suppliers must agree to adhere to before we will work with them. The ESP covers topics such as Bribery & Corruption, Labour Rights, Freedom of Association, Working Conditions, Child Labour, Living Wage, Working Hours, Regular Employment, Inhuman Treatment, Entitlement to Work, Sub-contracting, Environmental Compliance, Conflicts/Sanctions, Personal Data and Product Safety.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we provide training to all staff and have resources available at all times within our training Den.

### **BREACHES**

Any employee who breaches this policy could be subject to disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **POLICY REVIEW**

This policy was published by Elspeth Brown, Operations Director on January 2024, and will be reviewed annually.