

## **MODERN SLAVERY STATEMENT**

### **Beliefs & Values**

- (a) The Grove Media Limited has a zero tolerance approach to modern slavery and human trafficking. We are committed to acting ethically in all our business practices, acting with due diligence to implement and enforce effective systems and controls within our business to ensure modern slavery and human trafficking does not take place anywhere within our business or our supply chains. We are committed to ensuring there is complete transparency in our business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern slavery Act, 2015. We expect the same high ethical standards to be upheld by all our business partners and demand that their supply chains aim to respect the pledge to eradicate modern slavery.
- (b) This policy applies to all persons working for us, on our behalf in any capacity, including employees at all levels, directors, agency workers, media partners & their suppliers.

### **Business Structure & Supply Chains**

The Grove Media Limited is one of the leading independent media agencies in the UK, wholly owned by the working directors, and has offices in London, Wilmslow and Worcester. The company specialises in the planning and buying of TV, Cinema, Press, Out of Home, Radio, Direct (Door-to-Door distribution) and Digital advertising.

All of our business partners are based in the UK, however in certain sectors we are aware that some may source materials and/or workers from the EU and around the world. Our supply chain includes providers of print and therefore paper manufacturers, staff working in theatres which may be low paid overseas workers, couriers and agency staff for example.

We recognise these possibilities as our main areas of risk. In accordance with our zero tolerance policy we will clearly communicate our expectations to business partners by issuing a compliance form requiring that our statement is read, confirmation of due diligence and the commitment to adhere to our ethical values and the promise to uphold the policies of The Modern Slavery Act. This will be signed and dated by a member of management.

### **Employee awareness, training and compliance**

As a business we take full responsibility for making sure all employees on every level are made aware of our demand for ethical practices in relation to The Modern Slavery Act. Staff training on this policy forms part of our company induction process and is detailed in our employee code of conduct. All employees are required to read and sign our code of conduct which highlights our commitment to uphold the highest standards of workplace ethics, behaviour and human rights. All managers are responsible for ensuring all those that report to them understand and comply with this policy and are given adequate and regular training where necessary. We encourage employees to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains and to report it to management. We encourage openness from our staff and any comments and concerns will be taken in good faith without the fear of detrimental treatment as a result as per our Whistle Blowing Policy.

### **Effectiveness**

The Grove Media Limited will carry out periodic audits of our business practices. We will converse with new and existing business partners to identify risk areas which may arise and discuss where improvements can be made if failures are identified. Refusal to comply will result in the termination of business relationships and any employee who breaches our policy will face disciplinary action, which could result in dismissal for gross misconduct.

Our Finance Director Sean Guthrie is responsible for making sure all policies and procedures are reviewed annually.

### **Approval**

This statement was approved by the Board of Directors on 30th September 2019.