Anti-Modern Slavery Policy

Background

At h2o Creative we are constantly looking at our business through the lens of its wider role in society. So, as we juggle the management of our people, operations, commercials, clients and the creation of award-winning work, our eyes are always open to much bigger and broader issues. Which is why we genuinely believe that sustainability, the environment, waste management, human rights and the true cost of a throw-away society are topics that just cannot be ignored.

As part of this, we aim to have high ethical standards and, as such, commit to follow Section 54 of the Modern Slavery Act 2015 on Slavery and Human Trafficking (despite being below the size of business required threshold).

What is slavery?

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires many organisations and individuals to play a part. At first glance, individuals may think this subject is irrelevant to us, but it is not. At a very basic level, preventing exploitation and human trafficking, and protecting our workforce and reputation, makes good business sense.

The MSA 2015 recognises the important role businesses can, and should, play in tackling slavery and encourages them to do more. Companies need to pay particularly close attention to their supply chain, especially those areas which have historically proven to be at risk of the activities above mentioned in 'What is Slavery?'

- Outsourced activities such as cleaning, waste management, etc
- Short-term hire of low-skilled labour
- Sourcing of raw materials from certain locations in the world

Responsibilities

The Company, our managers and our colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity. Everyone must observe this Policy and be aware that 'turning a blind eye' is unacceptable and simply not an option.

The Company

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation
- Be clear about our recruitment policy
- Examine our supply chains and be clear with key suppliers our expectations regarding the Act
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us
- Ensure we have in place an open and transparent grievance process for all staff
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- Make a clear statement that we take our responsibilities to our employees and our clients seriously

Managers

Managers will:

- Listen and be approachable to colleagues
- Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- Remain alert to indicators of slavery
- Raise the awareness and ensure all employees are provided a copy of this Policy and are aware of their responsibilities
- Use their experience and professional judgement to gauge situations

Colleagues

We all have responsibilities under this Policy. Whatever your role or level of seniority, you must:

- Keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting Slavery below)
- Follow our reporting procedure if a colleague tells you something you think might indicate they are, or someone else is, being exploited or ill-treated
- Tell us if you think there is more, we can do to prevent people from being exploited

The Risks

The areas of risk we face, related to slavery and human trafficking, are limited. We have a direct relationship with our suppliers. However, that does not mean that we can be complacent and not vigilant. We manage these risk areas through our procedures set out in this Policy, including being very clear about it in our Supplier Guiding Principles.

Our Procedures

Anti-Slavery Statement

We make a clear statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

Supply Chains

We tell the companies we do business with that we are not prepared to accept any form of exploitation, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

We apply reasonable due diligence to risk-assessing our supply chain and use the following mechanisms to do this:

- Supplier mapping, initially performed on spend level and then industry sector, to identify key vulnerabilities
- Risk assessment of spend areas in relation to the supply chain and their propensity of historically proven risk
- Training and knowledge sharing for key purchasing people
- Ensuring all suppliers deemed 'at risk' are fully supportive to the aims of this Policy, (including asking for copies of their Anti-Modern Slavery Statement and Policies)
- Harmonising those processes which are already mutually inclusive of the aims of this Policy into the due diligence
- If any issues are identified then this is escalated to the senior stakeholders in the business, with all methods of remediation to be available (up to and including exiting the relationship with the supplier)

Recruitment

If, through our recruitment process, we suspect someone is being exploited, a Director will be informed and will follow our reporting procedures (see Reporting Slavery below).

Using recruitment agencies:

- The Company follows firm policy and only uses agreed specified reputable recruitment agencies
- We expect all recruitment agencies with whom we engage:
- To fully comply with the Modern Slavery Act 2015
- Are free from ethical ambiguities
- Are transparent, accountable and auditable
- If the Company has reason to believe that any recruitment agency has failed to meet these standards, a Director should be informed and any contracts with them would be terminated
- We keep agents on the list under annual reviews

General recruitment:

- We always ensure all staff have a written contract of employment
- We always ensure staff are legally able to work in the UK
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents
- The person is acting as though they are being instructed or coached by someone else
- They allow others to speak for them when spoken to directly
- They are dropped off and collected from work
- The person is withdrawn, or they appear frightened
- The person does not seem to be able to contact friends or family freely
- The person has limited social interaction or contact with people outside their immediate environment

This list is not exhaustive. Remember, a person may display a few of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it to one of the Directors who will follow our reporting procedures.

Reporting Slavery

Talking to someone about your concerns may stop someone else from being exploited or abused. If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with a Director who will decide a course of action which may include contacting the Police or the Gangmasters Licensing Association (GLA). Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with a Director before taking any further action.

Training

We ensure that all employees are made aware of this Policy, and their obligation to comply with this Policy.

Monitoring our Procedures

We will review our Anti-Modern Slavery Policy regularly, at least annually. We will provide information and/or training on any changes we make.

This Policy has been communicated throughout our company. It will be reviewed on a regular basis to evaluate continued relevance, monitor compliance, and drive continuous improvement.

Last reviewed: 14/01/25