



Human Trafficking and Modern Slavery Conduct Required

Introduction

This statement sets out Creative Listening's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year [1 April 2023 to 31 March 2024 to be reviewed annually].

As part of the education and media industries, Creative Listening recognise that it has a responsibility to take a robust approach to slavery and human trafficking.

Creative Listening is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of:

- Scripting, audio and video production services

Countries of operation and supply

The organisation currently operates in the following countries:

- UK, US and Germany

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We consider the assessed risk to company activities to be very low. Currently all work is carried out in house and in the UK, with no subcontracting.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- As we produce all our work in house, we do not see any of our activities to be at a high risk of slavery or human trafficking.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** the company Directors are responsible for putting in place and reviewing policies and the process by which they were developed
- **Risk assessments:** the human rights and modern slavery risk analysis is currently considered to be very low
- **Investigations/due diligence:** the company Directors are responsible for any investigations and due diligence
- **Training:** No further training is currently deemed necessary within the company's business activities

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can speak directly to the company Directors.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;

Board approval

This statement has been approved by the organisation's [board of directors/members], who will review and update it annually.

James Vyner - Company Secretary/Director - signature:

A handwritten signature in black ink, appearing to read 'James Vyner', with a long horizontal flourish extending to the right.

Date: 01/04/23