



Great State

# Modern slavery & human trafficking statement

## Version control

Version number	Changes	Author	Date
V1.0	Created	VJ	01/04/20

April 2020 v1

## 1 Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

The statement sets down E3 Media Limited trading as Great State commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## 2 Organisational structure and supply chains

This statement covers the business activities of Great State which are as follows:

Great State is an independent digital consultancy based in Bristol and London employing 70+ people.

The Company currently operates in the following countries:

We operate in the United Kingdom as a digital consultancy for a wide range of businesses.

The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

- All potential workers undergo a selection process which rigorously checks the Right to Work in UK.
- All payments made are equivalent to or more than the National Minimum Wage (NMW).

## 3 Initiatives

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

- Policies: HR further creates and manages the implementation of most policies across the business.
- CEO and Managing Directors share accountability for assessing the risks.
- Investigations/due diligence: HR & Managers manage the process in line with the relevant policy.
- Training: All managers are briefed in this policy and it is fully adhered to in our recruitment process.

## 4 Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to attend a briefing on the policy and adhere to its guidance which covers.

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation or how to use the whistleblowing policy.
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

## 5 Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- Whistleblowing policy - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- Code of Conduct - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- Corporate Social Responsibility (CSR) Policy - The Company's CSR policy summarises how we work responsibly with suppliers and local communities.

## 6 Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Senior Management team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by Neil Collard, Managing Director

Signature: *Neil Collard*

Date: 03/04/20