

MODERN SLAVERY STATEMENT

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This statement is made on behalf of Smarts' UK operations and is a demonstration of our commitment to anti-slavery and human trafficking practices and an affirmation of the values we hold and adopt across our business.

Smarts is committed to ensuring that the way we conduct our business and deal with our suppliers reflects our commitment to working in an honest, open and ethical manner. We recognise our social, ethical and environmental responsibilities arising from our operations, as well as our responsibilities towards the welfare of our employees, customers, suppliers and the communities in which we operate. We aim to ensure that the way we run our business prevents and deters any form of modern slavery and human trafficking from occurring anywhere in our business and supply chain.

ORGANISATION STRUCTURE

Smarts, a member of the MSQ Partners Group of companies, primary business is the provision of marketing communication consultancy and services including advertising, public relations, design and digital marketing. Smarts has its head office in the UK and has an annual turnover of over £8million.

OUR SUPPLY CHAIN

As a service company operating in the UK, with limited production output, our supply chain is very simple. The majority of our workforce are permanent employees, and we have a limited number of external suppliers or contractors in our supply process.

Respecting human rights in the supply chain is ultimately our suppliers' responsibility. However, the limited nature of our supply chain makes it relatively easy to play an active role in supplier development and we have adopted various means to communicate our expectations to our suppliers.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. This policy reflects our commitment to acting ethically and with integrity in all our business 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. Each business area is responsible for ensuring all those affected by their supply chain are producing goods and services which adequately

meet recognised minimum requirements for worker welfare and conditions of employment. Staff are expected to report concerns and management are expected to act upon them.

As part of our 'Smarts Preferred Supplier Process' we ask all suppliers to confirm they have an active Anti-Slavery and Human Trafficking policy in place. If this is not in place and if any supplier is unable to meet all the requirements, they will be given the opportunity to comply and address the areas that need improving, within a set timeframe. An action plan will be given to the supplier's management team for them to address. If Smarts has reason to believe that the supplier is not making sufficient progress, then this could lead to the supplier being removed from the approved suppliers list. Overall company ethical trading issues are the responsibility of the CEO supported by the department heads that are responsible for implementing and monitoring ethical trading policies in the business.

We ensure compliance with all applicable employment legislation relating to employee recruitment and terms and conditions, including obtaining right to work evidence and guaranteeing that no staff working in the UK are paid less than the national living wage. We provide equal opportunities for employment, training and career development regardless of age, sex, race, religion, ethnic origin or other minority groups. Smarts' directors and employees review policies, processes and procedures in order to ensure that risks are properly assessed, with appropriate actions taken in order to protect the health and safety of employees. Formal reporting procedures are in place at all offices so that Smarts can monitor safety performance at a local level.

HOW WE MITIGATE RISK OF SLAVERY AND HUMAN TRAFFICKING

- A commitment to paying the UK Living Wage as a minimum.
- Labour and employment monitoring and the use of formal payroll systems.
- Training and raising awareness of the issue through Director briefings.
- Where possible we build long standing relationships with local suppliers and contractors and make clear our expectations of business behaviour including having in place suitable anti-slavery and human trafficking policies. This is formally addressed via our 'Smarts Preferred Supplier Process'.
- Assessing risk related to human trafficking and forced labour within our supply base.
- Visiting supplier premises to monitor compliance with standards and expectations.
- Systems to encourage the reporting of concerns and the protection of whistle blowers. Details about whistle blower protection and anonymity are outlined in all staff contracts.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

APPROVAL FOR THIS STATEMENT

This statement has been approved by our Board of Directors, who will review and update it as necessary on an annual basis.

COMMUNICATION

This statement is published on our website and is communicated with our suppliers and customers as requested.

Signed on behalf of Smarts by:

A handwritten signature in black ink, appearing to read 'P Arlow', is positioned below the text 'Signed on behalf of Smarts by:'. The signature is written in a cursive, flowing style.

PIPPA ARLOW
GLOBAL CEO

Date: 1st September 2021