

Modern Slavery Statement

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the7stars Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. This statement relates to actions and activities during the financial year 1st April 2017 – 31st March 2018.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The7stars Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Organisational structure and supply chains

This statement covers the activities of the 7 stars Ltd. The 7 Stars is an independent media agency, operating solely in the UK that plans and buys campaigns across all media channels for a number of challenging, inspirational and extraordinary advertisers. The core beliefs of the agency are as follows:

- great service starts with the best people
- the best rates come without compromise
- great planning looks forward, not back
- the best campaigns start with smart insights

To be successful, the business believes all these elements must be managed with honesty, transparency and integrity.

Our supply chains include the sourcing of other creative/content agencies/media owners to partner with in the creation and delivery of campaigns and our outsourced service providers including HR and IT. Our suppliers are predominantly based in the UK.

Risk assessment

We have conducted a risk assessment to understand the risk in relation to slavery or human trafficking and believe there are no areas of concern.

Responsibility

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

Policies: Finance Director and outsourced HR department

Investigations/due diligence: Finance Director and outsourced HR department

Training: Finance Director and outsourced HR department

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know and are encouraged to raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. 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. Detail of the whistleblowing policy is included in the Employee Handbook.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act 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.
5. Supplier terms and conditions. We are committed to ensuring that our 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. We work closely with our suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Due diligence

The 7 Stars Ltd undertakes due diligence when considering taking on new suppliers. We have a supplier policy and preferred list suppliers which is regularly reviewed. The organisation's due diligence and reviews include:

- An online search to ensure that the organisation has never been convicted of offenses relating to modern slavery.
- Our modern slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- That they have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- (For UK suppliers) They pay their employees at least the national minimum wage / national living wage

- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations

We take these conditions seriously and may invoke sanctions or terminate the contract for any suppliers who seriously evoke these conditions.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs).

The organization will know the effectiveness of the steps they are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Training

Within the HR induction all new starters are made aware of how to identify the signs of modern slavery, how to assess the risk and the necessary steps to take if they suspect that it is taking place within our supply chain.