

## **Modern Slavery Statement for Financial Year 2019/20 - 2020/21**

This statement is made according to s.54 of the Modern Slavery Act 2015 and sets out the steps that Instinctif Partners has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Instinctif Partners 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.

We conducted an internal risk assessment, where it has been ascertained that as a professional services firm the risk of trafficking or slavery in our direct workforce is very low.

### The nature of Instinctif Partners' business

Instinctif Partners is an international consultancy – a partnership – a specialist in reputation, influence and communication. We work with our clients across multiple and complex audiences combining deep insights, expert storytelling and creative delivery to change behaviours, emotions and perceptions.

We employ 326 people across Europe, Africa, and the Middle East, acting for over 565 clients across the globe, from large quoted multi-national corporations to SMEs just starting on their journey.

As a global business communications consultancy, we offer deep expertise across five core practice areas: capital markets, specialising in corporate transactions, M&A communications, IPO support and strategic advice; corporate, encompassing activity including corporate communications, reputation management, crisis management, thought leadership, and digital communications; public policy, comprising of services such as influencer relations, government relations, trade association management, and policy intelligence; insight and research, engaged in the context of brand strategy, marketing strategy and customer experience; and content and creative, delivering creative, award-winning communications solutions in annual reports, film production, website design and content production.

And likewise, we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business.

### Our policies

Instinctif Partners operates several internal policies to ensure that we are conducting business ethically and transparently. These include:

1. **Anti-Slavery Policy.** This policy sets out the company'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 checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. **Agency Workers Policy.** We only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency.
4. **Whistleblowing Policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are treated, or practices within our business or supply chain, without fear of reprisals.
5. **Employee Code of Conduct** (as per the PRCA Guidelines). We make it clear to employees what actions and behaviour are expected of them when representing the Company. Instinctif Partners strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

### Due Diligence in our Business and Our Supply Chain

We have conducted an internal risk assessment and ascertained that as a professional services firm, the risk of trafficking or slavery in our direct workforce is very low.

Instinctif Partners has a global supply chain, and our operating companies buy goods and services from many different suppliers around the world.

Instinctif Partners requires each operating company to maintain a preferred supplier list locally. We conduct due diligence on all suppliers before allowing them to become a preferred supplier.

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

1. They have taken steps to eradicate modern slavery within their business
2. They hold their suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage/national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

It is the responsibility of the operating companies to select, monitor and manage any suppliers that they use.

### Training

We regularly conduct training for Managers and nominated members of staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. Furthermore, in the coming year, training on our Anti-slavery policy will form part of the company welcome day for all new employees upon onboarding.

### Our performance indicators

Instinctif Partners has reviewed its key performance indicators (KPIs). As a result, the company is:

- Working towards having nominated and relevant employees complete training on modern slavery.
- Developing a system for supply chain verification, whereby the company evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains, whereby the company evaluates all existing suppliers.

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

Approval for this statement

This statement was approved by the Board of Directors on January 2020.