

# Slavery and Human Trafficking Statement Financial Year Ending 31 December 2016

# Slavery and Human Trafficking Statement

This statement has been ratified by the Board of Chime Group Holdings Limited, Chime Group Limited, VCCP Group LLP and CSM Sport and Entertainment LLP.

Companies in the Group that are required to issue this statement for the financial year ending 31 December 2016 include Chime Group Holdings Limited, Chime Group Limited, VCCP Group LLP and CSM Sport and Entertainment LLP.

# Slavery and Human Trafficking Statement

## Our Group's Organisational Structure

- Chime is a sport, entertainment and communications group with more than 2,000 employees worldwide. To facilitate our operations and to reflect the agencies specialisms, we have structured our agencies into five divisions: CSM in sport and entertainment; the VCCP Partnership in marketing communications; OPEN Health in healthcare communications, public relations and market access; CIE in market research; and the Chime Specialist Group in communications in specialist markets such as financial and professional services, technology, sustainability and media planning.
- Our work ranges from collection and analysis of data through to the creation of ideas and concepts, people and product promotion, and event delivery and coordination. We also manufacture and handle raw materials within our CSM division.
- Each agency works with clients either as a sole entity or as part of a wider divisional contract or project. In this way we can offer clients specific individual services or a wider integrated service. We also engage and work with third party suppliers to help deliver client briefs.
- To assess potential slavery and human trafficking in our business and our supply chains, we have reviewed our internal processes and Codes of Conducts as well as our primary suppliers through an initial risk assessment.

# Slavery and Human Trafficking Statement

## **Our Codes, Policies & Awareness**

- We do not tolerate any form of modern slavery or human trafficking in any part of our business.
- Our current Values, Code of Conduct and Our Responsible Business Code are aligned with and support the United Nations' Guiding Principles on Business and Human Rights. The Codes impose moral obligations on our employees to help us uphold the International Bill of Human Rights as well as the core conventions of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. All operating companies are required to adhere to these Codes and the implementation is determined at operating company level and is each agency's responsibility.
- To raise awareness about the risks of modern slavery within our business and supply chain, we have provided employees with practical advice about signs and areas to watch out for and steps that should be followed if they have any concerns. We also have introduced targeted training and we will be extending this training to other teams across the Group in the future.

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## Risk Assessment

- Given the decentralised nature of the divisions, the diversity of services provided by each agency within each division, and the significant number of individuals involved in engaging suppliers, our main goal for the initial year of reporting was to identify potential high risk areas so we could test our current controls in priority areas.
- As part of our initial assessment, we mapped and categorised our primary suppliers to enable the identification of high risk areas (by agency, category, spend & geography).
- All suppliers were placed into one of 23 spend categories, and key details such as the value of that spend and location of service captured. This provided a data set to identify areas of spend across geographies, with risk territories identified by means of the Modern Slavery Index.
- Service firms used by the Group were identified as typically falling within the following categories: professional services, media buying, logistics delivery, venue hospitality, security services, transport and travel, cleaners and maintenance. Goods that we purchase include items such as raw materials, merchandise, utilities and general office equipment.

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## Monitoring

- Overall, the risk assessment has demonstrated that the majority of the Group's primary tier suppliers are in low-risk countries in accordance with the Modern Slavery Index. There are areas however that require further information and analysis. This will now be a key focus for the Working Group who will be using the results of the initial assessment to make recommendations for future changes to the way the Group engages with its suppliers.
- The assessment has also identified that the potential for higher risk suppliers and geographies is likely to exist further down the supply chain. Advice and guidance relating to these areas and appropriate, proportionate controls and engagement may need to be considered.
- We have a third party managed whistleblowing helpline in place throughout the business to which all employees, including those in non-UK offices, have access if they feel they cannot raise their concerns internally. Our helpline provides a secure way for employees to report any concerns or suspected cases of misconduct, including suspicions of forced labour or trafficking activities. The helpline number is communicated to employees through the induction process and the Group intranet.

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## Future Commitments

- With the increased awareness within the Group, we will work with our clients to engage on topics such as slavery and human trafficking in our supply chains.
- In the following year, we will enhance the terms of reference and objectives for the Working Group to include an assessment of current controls and behaviours particularly in high risk supplier areas or geographies.
- Lessons have been learnt from the initial exercise and in the following years we hope to make improvements to the way we monitor and assess risks within our supply chain. This is important given the evolving nature of our business and industry.