

# Slavery and Human Trafficking Statement Financial Year Ending 31 December 2017

# 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 2017 include Chime Group Holdings Limited, Chime Group Limited, VCCP Group LLP and CSM Sport and Entertainment LLP.

We do not tolerate any form of modern slavery or human trafficking in any part of our business and are committed to carrying on our business in a manner which respect the rights of individuals in the communities in which we operate. We have taken, and are continuing to take, steps to ensure that our businesses identify risk areas in their supply chains and to implement policies and procedures to eliminate those risks.

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## About us

- Chime is a sport, entertainment and communications group with approximately 2,500 employees working in some 60 offices in 18 countries worldwide.
- The Board of Directors of Chime are responsible for the overall strategic direction of the Group including ensuring that systems of identification and management of risk, including the risk of slavery and human trafficking in our business or supply chain, are robust and appropriate.
- Our group is structured 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. Each division has its own senior management team responsible for the direction and focus of the agencies in that division and for implementing policies adopted at a Group level.
- Within each division we operate as a number of agencies reflecting different sector specialisms or areas of focus. Each agency has its own management and reporting structures in addition to those identified above.

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## Our approach

- Our Responsible Business Code and Staff Code of Conduct are aligned with and support the United Nations' Guiding Principles on Business and Human Rights. The Codes impose moral obligations on our employees and those with whom we work 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 division 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 targeted training and we will be extending this training to other teams across the Group in the future.
- Across each of our five divisions 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.
- Notwithstanding the diverse nature of the services offered by our Group and the significant number of individuals involved in delivering those services, the Group has assessed our business as low risk for modern slavery and human trafficking issues. All of our businesses have comprehensive employment policies and practices including flexible working, diversity and equal opportunities and grievance policies which minimise the risk of modern slavery.

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- Whilst our businesses engage with a broad range of suppliers worldwide we do not consider our supply chain to be high risk for reasons set out below.

## **Assessment**

- In 2016/17 the Group undertook a review of its supply base with a view to identifying high risk suppliers or areas for focus. As part of the initial assessment, each supplier was mapped and categorised by agency, category, spend & geography).
- Suppliers were placed into one of 23 spend categories, and the value and location of service provided / goods delivered was identified.
- This provided a data set to identify areas of spend across geographies, with risk territories identified by means of the Modern Slavery Index.
- Suppliers 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.
- Overall, the risk assessment demonstrated that the majority of the Group's primary tier suppliers are in low-risk countries in accordance with the Modern Slavery Index.

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## Next Steps

- Our assessment identified that, whilst we can be confident there is little risk in our primary tier suppliers there was insufficient understanding of the position further down the supply chain. Although this was not judged to be a significant risk, it was determined that this should form the focus for further work and that advice and guidance should be received in order to ensure that appropriate and proportionate controls and engagement are in place.
- We continue to focus on ensuring that our processes have embedded within them a robust, systematic, risk based approach to assessing the risk of modern slavery within our supply chain. In addition to the points above, we continue to review our policies on a regular basis and are currently focussed on ensuring that we effectively communicate our policies and training across the whole of our business. Steps include launching a new intranet.
- We maintain a third party managed whistleblowing helpline throughout the business to which all employees have access, including those in non-UK offices, if they feel they cannot raise their concerns internally. In our periodic reminders to staff we will include the reporting of concerns in relation to supply chain management (including modern slavery).