

**CHIME**<sup>™</sup>

SLAVERY AND HUMAN  
TRAFFICKING STATEMENT

YEAR ENDED 31<sup>ST</sup> DECEMBER 2018

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to the Modern Slavery Act 2015 [the “Act”] and has been ratified by the Boards 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 ended 31 December 2018 are 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.

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

## ABOUT US

The Board of Directors of Chime Group Holdings Limited 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. The Group provides services within two core areas; communications and sports and entertainment:

## COMMUNICATIONS

### VCCP

VCCP is an advertising and marketing services group which operates in advertising, marketing services, direct marketing, digital communication, data consultancy, multimedia content and experiential, marketing consulting, retail and shopper marketing and media planning and buying. VCCP also now includes Watermelon, our market leading customer experience and insight specialists, formerly known as Chime Insight and Engagement.

### The Chime Specialist Group

The Chime Specialist Group ('CSG') is a marketing and consultancy group with five different specialist agencies in financial and professional services, technology and sustainability consultancy. The agencies are uniquely equipped to be trusted advisors to their clients, helping to navigate, harness and drive change through their full-service capabilities, internationally.

## SPORTS AND ENTERTAINMENT

### CSM Sport & Entertainment ('CSM')

CSM is a group of internationally recognised agencies, working together to put clients and people at the heart of the world's greatest experiences in sport and entertainment. Working with brands, rights holders, governing bodies, governments, host cities and athletes across the globe, CSM specialises in strategic consultancy, rights sales, sponsorship activation, hospitality, branding and wayfinding, athlete management and communications across major sporting events.

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## OUR APPROACH

- Our Chime Group Responsible Business Code sets out the high level behaviours we require each of our agencies, our staff and our trading partners to uphold. In it we state that:

*“We will continue to strive to make a positive contribution to society and the environment by: maintaining high standards of marketing ethics; respecting human rights; respecting the environment; supporting community organisations; supporting employee development; and managing significant sustainability risks in our supply chain.”*

Our Responsible Business Code, Staff Code of Conduct and other policies aim to support and uphold the United Nations’ Guiding Principles on Business and Human Rights. 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 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 continues to consider our business is 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.
- 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.

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

## ASSESSMENT

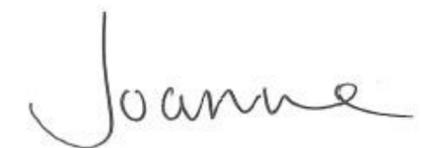
- We have assessed our supply base with a view to identifying high risk suppliers or areas for focus. This assessment included mapping by agency, category, spend & geography.
- Suppliers used by the Group were identified as typically falling within the following categories: professional services, media 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.

## PROCESS

- We conduct due diligence on all our suppliers above a minimum threshold. The due diligence process includes conducting searches using a leading compliance tool which enables us to access data from a wide variety of data points on companies around the world.
- Once a supplier has been accepted we continue to monitor for any change that may be notified through the compliance tool.
- During the course of 2018 we have implemented a new ERP system in one of our divisions which enables us to scrutinise spend in a more consistent manner. This means we can have greater confidence in our data and the information we hold on our suppliers and supply chain.
- We have also launched a more interactive and accessible intranet which enables us to share information and to communicate more effectively with our staff wherever they may be.

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

- Whilst we are confident there is limited risk in our primary tier suppliers we acknowledge there is still work to be done to understand risks further down the supply chain.
- Using our new and refreshed systems we will be taking steps to focus on a number of areas where we deem risks may be higher [principally where we operate in geographies where our knowledge of, and relationship with, our suppliers is less deeply embedded].
- We continue to focus on ensuring that our processes are robust, systematic, and assess the risk of modern slavery within our supply chain. Training and ensuring the application of consistent high standards remain a priority.
- In addition to the above, 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 those relating to slavery and human trafficking].



Joanne Parker  
Chief Operating Officer  
31<sup>st</sup> March 2019

THANK YOU

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