

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 December 2023.

Volspire Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

## Organisational Structure

Volspire Ltd and has business operations in the United Kingdom.

We operate in the video production sector. The nature of our supply chains is as follows: We are a service provider for the process of creating and delivering video content to clients or end-users. Encompassing various stages from pre-production to post-production and distribution. We do not deal in the sale and purchase of goods as a main part of our business.

For more information about the Company, please visit our website: [www.volspire.co.uk](http://www.volspire.co.uk).

## Policies

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

These include the following:

- Recruitment and selection policy - 1. Transparent Recruitment Process:
  - Clearly outline the recruitment process to make it transparent for all candidates.
  - Provide detailed job descriptions, qualifications, and requirements to attract suitable candidates.
  - Use reputable job platforms, agencies, and networks to advertise positions.
- 2. Verification of Identity and Eligibility to Work:
  - Implement a stringent process for verifying the identity of candidates.
  - Confirm the eligibility of candidates to work in the UK through proper documentation checks.
- 3. Supplier Due Diligence:
  - Conduct due diligence on recruitment agencies and third-party suppliers.
  - Ensure that suppliers share the commitment to ethical recruitment practices.
- 4. Training and Awareness:
  - Train hiring managers and staff involved in the recruitment process on the risks of modern slavery.
  - Raise awareness about the signs of exploitation and the company's commitment to preventing it.
- 5. Ethical Sourcing of Labor:
  - Avoid engaging with recruitment agencies that are not transparent about their practices.

- Clearly communicate the company's commitment to ethical labor practices to recruitment partners.

#### 6. Equal Opportunities and Non-Discrimination:

- Emphasize a commitment to equal opportunities and non-discrimination in all aspects of recruitment.
- Avoid any biases that may contribute to exploitation or unfair treatment.

#### 7. Interview and Selection Process:

- Ensure that the interview and selection process is fair, unbiased, and based on merit.
- Use diverse interview panels to minimize the risk of discrimination.

#### 8. Monitoring and Reporting:

- Regularly monitor recruitment practices for compliance with the policy.
- Establish a mechanism for reporting any concerns or suspicions related to modern slavery.

#### 9. Contractual Obligations:

- Clearly outline employment terms and conditions in contracts.
- Include clauses that prohibit any form of modern slavery or exploitation.

#### 10. Continuous Improvement:

- Regularly review and update the recruitment policy to address emerging risks and challenges.
- Seek feedback from employees and candidates to identify areas for improvement.

By incorporating these elements into the recruitment and selection policy, the video production company can take proactive steps to prevent modern slavery and ensure a fair, ethical, and transparent hiring process.

- Supplier code of conduct - 1. Policy Commitment:

- Clearly state the company's commitment to preventing modern slavery and ensuring ethical practices within the supply chain.
- Explicitly outline the consequences for non-compliance with the code.

#### 2. Legal Compliance:

- Require suppliers to comply with all relevant local and international laws and regulations regarding labor and human rights.
- Emphasise adherence to the UK Modern Slavery Act and similar legislation in other jurisdictions.

#### 3. Transparency and Disclosure:

- Mandate that suppliers disclose information about their own policies, procedures, and practices related to preventing modern slavery.
- Encourage suppliers to be transparent about their own supply chain and subcontracting relationships.

#### 4. Risk Assessment:

- Require suppliers to conduct risk assessments within their own operations to identify and mitigate modern slavery risks.
- Implement mechanisms for ongoing monitoring and evaluation of these risks.

#### 5. Ethical Recruitment:

- Prohibit the use of forced labor, child labor, and any form of bonded labor within the supplier's workforce.
- Encourage suppliers to use ethical recruitment practices, ensuring fair wages and safe working conditions.

#### 6. Verification of Employment Eligibility:

- Require suppliers to verify the eligibility of their employees to work in the respective countries, ensuring compliance with immigration laws.

#### 7. Fair Working Conditions:

- Set clear expectations for suppliers to provide safe and hygienic working conditions for their employees.
- Ensure that working hours and conditions adhere to legal standards and do not involve any form of exploitation.

#### 8. Freedom of Association:

- Support the right of workers to freely associate and join labor unions without fear of retaliation or discrimination.

#### 9. Training and Capacity Building:

- Encourage suppliers to provide training for their employees on their rights and responsibilities.
- Support suppliers in building the capacity to implement and monitor anti-modern slavery practices.

#### 10. Reporting Mechanisms:

- Establish a system for suppliers to report any concerns or incidents related to modern slavery without fear of reprisal.
- Implement a process for the company to investigate and address reported issues promptly.

#### 11. Supplier Audits and Assessments:

- Conduct regular audits and assessments of suppliers to ensure compliance with the Supplier Code of Conduct.
- Collaborate with third-party auditors for an independent evaluation of supplier practices.

#### 12. Continuous Improvement:

- Encourage suppliers to continually improve their policies and practices to prevent modern slavery.
- Engage in regular dialogue with suppliers to address challenges and share best practices.

By incorporating these elements into the Supplier Code of Conduct, the video production company can actively engage its suppliers in the prevention of modern slavery, fostering a responsible and ethical supply chain. Regular communication, monitoring, and collaboration are essential to ensuring the effectiveness of these measures over time.

- Whistleblowing policy - 1. Definition of Modern Slavery:

- Clearly define modern slavery within the context of the policy to ensure that employees understand what constitutes a violation.

#### 2. Protection of Whistleblowers:

- Emphasize the protection of whistleblowers from any form of retaliation, victimization, or harassment.
- Outline the confidential and anonymous reporting mechanisms available to employees.

#### 3. Awareness and Training:

- Provide training to employees on recognising signs of modern slavery and the importance of reporting such concerns.
- Raise awareness about the whistleblowing policy through regular communication channels.

#### 4. Clear Reporting Channels:

- Establish multiple reporting channels, such as a designated hotline, email address, or an online reporting platform.
- Ensure that these channels are easily accessible and well-publicized within the organisation.

#### 5. Timely Response and Investigation:

- Outline the company's commitment to promptly and thoroughly investigate all reports of modern slavery.
- Specify the process for handling and escalating reports to appropriate authorities if necessary.

#### 6. Anonymous Reporting:

- Facilitate anonymous reporting to encourage employees who may fear reprisals to come forward with information about modern slavery.
- Assure employees that their identities will be protected during the investigation.

#### 7. Non-Retaliation Commitment:

- Explicitly state the company's commitment to non-retaliation against whistleblowers, reinforcing a culture of openness and accountability.

#### 8. Communication of Policy:

- Regularly communicate the whistleblowing policy to all employees, making it easily accessible in the company handbook or on the intranet.
- Include the policy in the induction process for new employees.

#### 9. Legal Compliance:

- Ensure that the whistleblowing policy is in compliance with relevant UK laws, such as the Public Interest Disclosure Act (PIDA).

#### 10. Senior Management Accountability:

- Specify the role of senior management in overseeing the whistleblowing process and ensuring compliance with the policy.
- Demonstrate visible commitment to the importance of preventing modern slavery within the company.

#### 11. Record Keeping:

- Establish a system for keeping accurate records of all whistleblowing reports and their outcomes.
- Use these records for continuous improvement and as part of the company's commitment to transparency.

#### 12. Feedback Mechanism:

- Provide feedback to whistleblowers on the outcomes of investigations, maintaining transparency and trust within the organization.

#### 13. Collaboration with External Agencies:

- Outline the circumstances under which the company may collaborate with external agencies, such as law enforcement or NGOs, to address instances of modern slavery.

- Staff code of conduct - 1. Definition and Awareness:

- Clearly define modern slavery and human trafficking within the context of the Code of Conduct.
- Raise awareness among staff about the indicators and consequences of modern slavery.

#### 2. Legal Compliance:

- Emphasize compliance with relevant UK legislation, including the Modern Slavery Act.
- Outline the legal consequences for individuals involved in or supporting modern slavery.

#### 3. Ethical Recruitment Practices:

- Require employees to adhere to ethical recruitment practices when involved in hiring processes.
- Encourage staff to be vigilant for signs of exploitation during recruitment and report any concerns.

#### 4. Supplier Engagement:

- Communicate the company's commitment to working with suppliers who adhere to anti-modern slavery practices.
- Encourage employees to consider the ethical practices of suppliers and report any concerns.

#### 5. Reporting Mechanisms:

- Outline the process for reporting suspicions or concerns related to modern slavery, emphasizing confidentiality and protection against retaliation.
- Encourage a culture where employees feel a responsibility to report any potential violations.

#### 6. Training and Awareness Programs:

- Provide regular training programs to educate staff about modern slavery, its impact, and their role in preventing it.
- Integrate awareness initiatives into employee onboarding processes.

#### 7. Fair Employment Practices:

- Reinforce the importance of fair and just employment practices within the organization.
- Prohibit any form of forced or bonded labour, child labour, or discriminatory practices.

#### 8. Due Diligence in Operations:

- Communicate the expectation that employees exercise due diligence to identify and address any potential modern slavery risks within their scope of work.
- Encourage proactive reporting of concerns related to colleagues or external parties.

#### 9. Monitoring and Compliance:

- Establish mechanisms for monitoring and assessing compliance with the Staff Code of Conduct.
- Conduct periodic reviews and audits to ensure ongoing adherence.

#### 10. Professional Development:

- Integrate anti-modern slavery considerations into professional development programs.
- Encourage employees to stay informed about evolving best practices in combating modern slavery.

#### 11. Whistleblowing Protection:

- Emphasize the protection afforded to employees who report modern slavery concerns.
- Clearly state the company's commitment to non-retaliation and the availability of confidential reporting channels.

#### 12. Collaboration with Authorities:

- Outline the circumstances under which the company may collaborate with law enforcement or other authorities to address modern slavery.

#### 13. Continuous Improvement:

- Communicate the company's commitment to continuous improvement in anti-modern slavery measures.
- Encourage feedback from employees to identify areas for enhancement.

- Procurement policy - Training for Procurement Staff:

Provide training for procurement staff on recognising signs of modern slavery, understanding risk factors, and implementing the company's procurement policy effectively.

#### Transparency and Reporting:

Promote transparency in procurement processes, encouraging suppliers to disclose information about their labour practices.

Establish a reporting mechanism for suppliers to disclose any instances of modern slavery within their operations.

#### Collaboration with Suppliers:

Foster collaboration with suppliers to address modern slavery risks collectively.

Encourage suppliers to report any concerns they may have within their own supply chains.

- Safeguarding policy - Reporting Procedures:

Clearly outline reporting procedures for staff who suspect or witness instances of modern slavery.

Emphasize the duty to report concerns promptly and ensure that whistleblowers are protected from retaliation.

#### Collaboration with External Agencies:

Establish procedures for collaborating with external agencies, such as law enforcement or social services, to address suspected cases of modern slavery.

Communicate the company's commitment to cooperating with relevant authorities.

#### Risk Assessments:

Conduct regular risk assessments to identify areas within the company's operations where modern slavery risks may be present.

Implement measures to mitigate these risks and protect vulnerable individuals.

#### Inclusive Policies:

Ensure that policies related to recruitment, employee welfare, and supplier engagement are inclusive and consider the prevention of modern slavery.

Collaborate with suppliers and partners who share a commitment to safeguarding vulnerable groups.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

## Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK and in low-risk industries, such as video production and other creative industries..

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

## Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 12 months.

The statement was approved by the board of directors.

A handwritten signature in black ink, appearing to read "R Berry", written over a horizontal line.

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Ryan Berry, Director  
Volspire Ltd

08/01/2024

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Date