

Starcom Worldwide Limited
(the “Company”)
Modern Slavery Statement

Introduction

This statement sets out the Company’s actions aimed at taking measures to prevent slavery or human trafficking in its business and supply chain. The Company is committed to improving its practices to combat slavery and human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (**the “Act”**) and constitutes the Company’s slavery and human trafficking statement in relation to its actions and activities during the financial year 1 January 2019 to 31 December 2019.

Organisational structure and business

The Company acts as a media planning and buying agency. The Company’s ultimate parent company is Publicis Groupe S.A a French incorporated listed entity (**the “Groupe”**).

Our Supply Chains

The Company’s supply chains include production companies, software developers, I.T. and other office equipment, professional services, office cleaning and other office facilities services. We are based in the UK as are the majority of our suppliers and our supply chain is low risk and non-complex in structure.

Our policies on slavery and human trafficking

Our position on slavery and human trafficking is clear as we have current long established policies, processes and practices in place to prevent this within our business operations and supply chains. We continuously look at ways to enhance these processes and we currently undertake the following measures:

It is now our policy to require our suppliers to adhere with our supplier code of conduct (**the “Code”**) which amongst other governance and compliance obligations made reference to in the Act, sets out the minimum behaviours, standards and practices we expect to see from our suppliers and amongst other obligations prohibits forced labour, discrimination and child labour, ensures supplier working conditions are safe and that workers are treated with respect and dignity with the aim of preventing slavery and human trafficking taking place anywhere in our supply chains or business operations. The Code is published on our external website and all new suppliers are required to read and acknowledge this as part of the on-boarding process.

Our Purchase Order Terms and Conditions and Global Supplier Agreements contract terms require our suppliers and vendors to comply with all applicable law and have recently been updated to include compliance with the Act and Code.

We practice responsible procurement. Contracts signed with major suppliers central or regional are encouraged to mobilize in favour of human rights through our internal ‘CSR Procurement Charter’ and ‘CSR Procurement Questionnaire’ which are sent to all suppliers during the tendering process. Suppliers are also sent CSR Procurement guidelines and their actions, commitment to CSR is tracked through our internal platform known as EcoVadis, and only suppliers who have conducted the self-assessment may progress to the next step, which is the selection process. Our major suppliers are encouraged to join the EcoVadis platform which amongst other things carries out an audit to assess suppliers corporate social responsibility standards including health and safety, environment, ethics etc. so that we can measure and monitor the suppliers progress and achievements with our compliance policies.

We comply with all relevant UK employment laws and have internal policies in place to prevent slavery and human trafficking included in the employee handbook, which is circulated to all employees and covers recruitment, health & safety, harassment, anti-bribery, equal opportunities and diversity. Our employees have access to a confidential whistleblowing process for raising concerns and we continue to increase awareness amongst employees through training on issues relating to slavery and human trafficking so that they may report any concerns as they arise. Since the Act came in to force, we have drafted a Anti - Slavery & Human Trafficking policy which has been included in the employee handbook, which all employees have access to and is communicated to all new joiners during the induction process.

The Groupe has been a signatory of the Global Compact 10 Principles of the United Nations since 2003, which includes protecting universal human rights and the elimination of all forms of forced and compulsory labour and child labour. The Groupe is committed to ensuring these principles are observed and this is highlighted in the its code of conduct, a defined set of internal policies, procedures and processes framework (*known as JANUS*) which sets out the compliance and governance processes applicable to all its global subsidiaries including the Company that help to prevent slavery and human trafficking and promote human rights. Janus is available to all employees.

Risk Assessment and Due Diligence

With the introduction of the Act, we assessed our supply chain for potential areas of increased risk of slavery and human trafficking. As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chains, we conducted a review of our major suppliers and identified those in high-risk areas.

We ask our existing and new suppliers to complete a self-assessment questionnaire detailing any action, procedures, policies and practices carried out by their organisation to prevent slavery and human trafficking. Suppliers must agree to adhere to the Code, a copy which is

attached to the questionnaire and they are also required to annually certify a declaration form confirming understanding and compliance with the Code and the Act.

High-risk suppliers will get a more detailed review of their questionnaires to identify areas of concern that may conflict with our Code or the Act, better understand the risk, provide feedback and agree steps to put in place to improve their processes. High-risk suppliers that will receive special attention include companies that operate using temporary low skilled workers, operate outside the UK or EEA and/or manufacture or trade in raw materials outside the UK or EEA.

We will continually assess our compliance with the Act through the mechanisms of an annual audit carried out by our legal, procurement and internal audit teams.

Further Steps

We will periodically review the effectiveness of our processes and systems and any changes will be reflected in future annual statements.

This statement has been approved by the board of directors of the Company.

Signed 

For and on behalf of Starcom Worldwide Limited

Director: Gerry Doyle

Date: 30 June 2020