

## Anti-Slavery & Human Trafficking Policy Statement

### 1. Introduction

11 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Cultural Capital slavery and human trafficking statement for the financial year ending 31 July 2017

12 Cultural Capital is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the Company is taking (and intends to take) to avoid the risk of modern slavery occurring within our services.

### 2. Due Diligence processes

21 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of Company services, Cultural Capital will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

22 Cultural Capital has in place systems to:

- Identify and assess the potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

23 Cultural Capital identifies the following as the principal areas of potential risk:

- Supply Chains for goods and services - particularly IT equipment and uniforms; outsourced cleaning and security services
- Recruitment agencies for temporary staff

### 3. Supplychains

## Anti-Slavery & Human Trafficking Policy Statement

- 3.1 In its supply chains, Cultural Capital has identified the following business areas as carrying material risks of modern slavery occurring:
- IT equipment
  - Clothing and uniforms
  - Outsourced cleaning
  - Outsourced security services
- 3.2 When tendering any types of goods or services, Cultural Capital requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015 during any tendering and selection process, including through contracting with suppliers from approved procurement frameworks.
- 3.3 When procuring any types of goods or services identified as carrying material risks of modern slavery occurring (4.1) the Company requires any supplier to evidence that that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.
- 4.3 Any supplier or potential supplier, identified in 4.2 or 4.3, wishing to supply to or partner with Cultural Capital that does not comply with the Modern Slavery Act 2015, or Cultural Capital own policies and procedures, will be removed from Cultural Capital list of suppliers and will not be considered for future supply to the Company unless they can demonstrate that these compliance requirements are met.
- 4.4 In terms of future steps, Cultural Capital will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products
- 4. Training**
- 4.1 To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff responsible for recruitment, procurement and contract management. We also require our business partners to provide training to their staff and suppliers and providers.
- 5. Recruitment practices**

## Anti-Slavery & Human Trafficking Policy Statement

- 5.1 Temporary staff and staff recruited indirectly by Cultural Capital are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, Cultural Capital conducts checks on such agencies before they are approved.
- 5.2 Through its recruitment processes, Cultural Capital ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

## 6. Company policies

- 6.1 Cultural Capital already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of Company business. Cultural Capital operates the following policies:

**Grievance and Whistleblowing policies** - these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

**Employee Code of Conduct** - this code sets out the actions and behaviour expected of them whilst employed by Cultural Capital. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain

**Anti-bribery and corruption policy** - Cultural Capital committed to the highest standards of ethical conduct and integrity in its business activities. Cultural Capital will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf

**Procurement policy** - this policy reflects Cultural Capital commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.

**Recruitment policy**- this policy ensures that Cultural Capital follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

## 7. Performance indicators

- 7.1 Where Cultural Capital has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPIs) to measure progress against reducing such risks. The Company will consider setting and reviewing KPIs in the following contexts:

## Anti-Slavery & Human Trafficking Policy Statement

- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
- assessment of third party suppliers of relevant goods and services and their supply chains

72 This statement will be made available to all staff members, stakeholders and the general public. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

73 Having assessed the training needs for all staff operating in the company, Cultural Capital will look at devising and implementing training and awareness- raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

### **Document Review Plans**

This document is subject to a scheduled annual review. Updates shall be made in accordance with business requirements and changes please see date and version.