



**NEXT FIFTEEN COMMUNICATIONS GROUP PLC  
( 'Next 15' or the 'Company' or the 'Group' )**

**SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 31  
JANUARY 2021, APPROVED BY THE BOARD OF DIRECTORS ON 8 APRIL 2021**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ('Act') and is the slavery and human trafficking statement for the financial year ended 31 January 2021 for Next 15, inclusive of relevant subsidiaries of Next 15 to which the Act applies.

The Board of directors of the Company has, at a properly convened meeting, viewed and approved this statement, and delegated authority to sign it on their behalf to the Chief Financial Officer of the Group.

**INTRODUCTION**

Next 15 recognises the importance of combating slavery and human trafficking. We do not tolerate modern slavery or human trafficking in our organisation or in our supply chain. This statement sets out the steps that the Next 15 is committed to taking across the Group to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place.

For the purposes of this statement, slavery and human trafficking are based on the definitions set out in the Act.

**OUR BUSINESS**

Next 15, together with its subsidiaries, is a data and technology-led marketing group comprised of 21 marketing businesses, spanning digital content, PR, consumer, technology, marketing software, market research, public affairs and policy communications. Headquartered in London, and listed on AIM, the Group has over 2,000 employees and operations in 15 countries operating primarily in the US and UK. The Group reported global turnover for the year ended 31 January 2021 of £323.7million.

**OUR SUPPLY CHAINS**

Given the nature of our businesses, we do not have an extensive supply chain network. Our supply chains include (but are not limited to): marketing consultants, information technology providers (software and hardware) and software developers, professional services, insurance and benefits providers, recruitment agencies, cleaning and catering services, office facilities and maintenance service providers, and advertising production, market research and other marketing services providers.

**OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Board undertakes to review this policy annually.

**RISK ASSESSMENT AND DUE DILIGENCE PROCESSES**

As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chains, we have undertaken an initial risk assessment at Group level to identify, assess and prioritise potential risk areas across our Group and its supply chains, such assessment being based on geography, the product or service supplied and the nature of the business transaction. This

assessment is to be incorporated into our existing risk assessment process which is undertaken at regular intervals.

We continue to view our industry and the majority of our suppliers as low-risk. Where any higher-risk areas are identified, we will seek to mitigate the risk of modern slavery occurring by building a more detailed review of potentially high-risk suppliers into our internal audit process by:

- gathering further information of the potentially high-risk services;
- obtaining relevant contractual terms; and
- holding discussions with the relevant Group company to see the steps taken by them in vetting the supplier, for example whether they have visited the supplier offices or have any other reasons for concern.

Due diligence on operating subsidiaries' suppliers is the responsibility of the relevant operating subsidiary, within the framework and policy set at Group level. Operating subsidiaries are required to report at least once each year on their top five suppliers as well as any other suppliers they have identified as being potentially high risk.

In 2021 we plan to build on our existing due diligence process and develop an enhanced 3<sup>rd</sup> party risk management framework to onboard new suppliers. This will include the completion of a questionnaire to confirm that key suppliers comply with all applicable laws and regulations and that there is no modern slavery or human trafficking in their business.

For the more complex ethical issues arising from the risk assessments and due diligence activities conducted by the Company, the Board constituted an Ethics Committee to be convened on an ad-hoc basis to discuss these matters in detail. The Ethics Committee will be paying particular attention to the ethical standards of the businesses we work with, their supply chains, and how they align with our own expectations.

We will continue to build upon the risk assessment, due diligence and mitigation process set out above in FY21 and will be undertaking a more detailed review of its effectiveness through our internal audit function in FY22, which will include developing key performance indicators to, where possible, measure our effectiveness year-on-year.

### **RESPONSIBILITY FOR COMPLIANCE**

The responsibility for all necessary activities to ensure Next 15's compliance with the values and standards set out in this statement will be co-ordinated across the Group's legal, human resources, finance, procurement, company secretarial and internal audit functions, in conjunction with relevant personnel at our operating subsidiaries.

### **RECRUITMENT**

We are an equal opportunities employer and pay a fair living wage in all jurisdictions that we operate in. All contracts of employment are drafted in accordance with the highest standards of local law and are compliant with human rights standards. During 2020, the Company invested in HR specific software which has improved the monitoring and reporting capabilities of the Group, therefore increasing oversight. We are confident that there is no risk of slavery or human trafficking in the employment or engagement of employees across the Group, but we remain vigilant.

### **TRAINING AND AWARENESS**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are committed to:

- providing appropriate training to relevant staff, including through induction programmes, the introduction of a new intra-Group e-learning platform and communication of the Group's Modern Slavery Policy; and

- communicating our zero-tolerance approach to modern slavery to relevant suppliers, contractors, and business partners at the outset of our business relationship with them, and where appropriate thereafter.

Group employees have access to a confidential whistleblowing process for raising concerns. However, we recognise that the current process, whilst appropriate at the time of inception, now requires review and improvement given the increasing size of the business. We have committed to exploring the implementation of an externally hosted employee 'speak up' platform in 2021. We are also renewing our internal training in 2021 to ensure that we have appropriate levels of awareness among employees of issues related to slavery and human trafficking including ensuring the mechanisms available to our workforce are sufficiently known about, trusted and accessible. Our processes will always protect individuals who come forward from being victimised further and provide access to counselling and support.

### **FURTHER STEPS**

We will review the effectiveness of the steps we are taking to ensure that there is no slavery or human trafficking in our supply chains and that any new mechanisms employed are adequate and fit for purpose. Following the improvements that we have committed to this year, we aim to monitor and, where necessary, improve our policies, procedures and systems on a continual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 January 2021.

*Peter Harris*

[Peter Harris \(Apr 21, 2021 13:03 GMT+1\)](#).....

Peter Harris

Chief Financial Officer

Next Fifteen Communications Group plc