



# Modern Slavery and Human Trafficking Statement

## Introduction

This statement sets out Bray Leino's actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business and those of its supply chain. This statement relates to actions and activities undertaken during the year 1st January 2019 to 31st December 2019 and to activities that are underway for 2020. The organisation is absolutely committed to preventing modern slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from modern slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of Pathfindr Limited. We offer a uniquely broad set of creative expertise across design, advertising, social, data, PR, digital, direct response, and events. Countries of operation and supply. The following activities are at considerable risk of slavery or human trafficking: None highlighted this calendar year.

## Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

Policies: The CEO is accountable for reviewing and designing all policies in relation to the workforce.

Investigations/due diligence: During the year 2022 there were no known breaches of suspected instances of slavery and human trafficking.

Training: The CEO is accountable for ensuring that Modern Slavery Awareness Training in the organisation is delivered accordingly. Team members received awareness training in 2022 aimed at identifying and risk-assessing human trafficking and modern slavery.

## Relevant policies

The organisation operates the following policies that link its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Recruitment Policy: Pathfindr ensures that all new employees provide proof of their identification and right to work in the UK. This involves physical checks of employees' passports or birth certificates.

Provision for Agency Workers Policy: Pathfindr uses The Mission Group's internal resourcing team who when needed uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## Due diligence

The organisation aims to undertake due diligence when considering taking on new suppliers and to regularly review its existing suppliers. During the next calendar year Pathfindr will:

Consider membership with Supplier Ethical Data Exchange (SEDEX) to support its commitment to eradicating modern slavery

### Carry out risk assessments for all suppliers

Ensure that any supplier found to be at considerable risk undertakes a full audit

### Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in consideration of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

Requiring all staff working in the business to have completed training on modern slavery by December 2020.

### Training

The organisation requires all employees working in the business to complete training on modern slavery.

The organisation's modern slavery training will aim to cover:

Our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available; How to identify the signs of slavery and human trafficking;

What initial steps should be taken if slavery or human trafficking is suspected;

How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

What external help is available, for example through the Modern Slavery Helpline;

What messages, business incentives, or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### Awareness-raising programme

As well as training staff, the organisation will aim to raise awareness of modern slavery issues via use of posters and leaflets across the organisation's premises. This is planned to take place by the end of 2023.

These explain to staff:

The basic principles of the Modern Slavery Act 2015;

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What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

What external help is available, for example through the Modern Slavery Helpline.

### Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Ben Sturgess – Founder

Date: June 2023