

## **Modern Slavery Act Policy**

Modern Slavery is a term used to encapsulate both offences in Modern Slavery Act: slavery, servitude, forced or compulsory labour and human trafficking.

Definitions:

**Slavery:** in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

**Servitude:** is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

**Forced or compulsory labour** is defined in international law by coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is extracted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

**Human Trafficking** requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.

### **Modern Slavery Act 2015**

The introduction of the Modern Slavery Act 2015 requires Space & Time Ltd to be transparent about what they are doing in respect of the welfare and wellbeing of its employees and those working on its behalf.

### **Space & Time Media Ltd's (S&T) Policy Statement**

The following statement describes steps S&T will take to ensure that slavery and human trafficking is not taking place and that servitude or compulsory labour is not practised within the business.

S&T hold a zero tolerance to modern slavery in any aspect of our business.

Below are just some of our ways of achieving this:

We are an independent media agency with over 135 staff and an annual turnover of over £72 million. We provide a growth marketing service and given the nature of what we do, we believe there is a low risk of slavery or human trafficking having connection with our business activities. We are committed to legal compliance which is continually monitored and managed through internal and external reviews. We encourage staff input and operate with an open approachable style of management. To ensure there is no room for complacency we have taken the steps detailed below:

**Fair Pay:** Space & Time is an accredited Living Wage Employer. The Living Wage Foundation was set up in 2011 to recognise and celebrate responsible employers who pay the real living

wage. The living wage is an hourly rate that is independently worked out each year based on the cost of living and what people need to get by and is above the minimum wage set by the Government which takes into account what is affordable for businesses.

This means that we are committed to paying all those employed by Space & Time and any third party contracted staff the real living wage.

Whistleblowing: S&T encourage all its workers to report any concerns relating to its direct activities. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

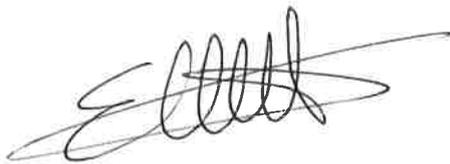
Employee Awareness and Compliance: S&T's company handbook sets out all of our policies and procedures. Being aware of the contents of our company handbook is one of our mandatory policies and all staff are issued with this upon joining S&T and asked to sign and return a copy as acknowledgement that they have read the handbook. An updated version is circulated to all staff annually.

Recruitment: Most of S&T's workforce is employed directly on a permanent or fixed term basis. We have an inhouse Recruitment Manager and our recruitment takes place through a combination of direct advertising on our company website, LinkedIn, CV Library and using reputable agencies and relying on referrals from employees within our organisation.

We only use specified, reputable employment agencies and have our own terms and conditions of business which we ask each agency to comply with. We verify the practices of any new recruitment agency as part of our terms of business with them before accepting any workers from that agency.

All employees who join S&T are subject to identity checks in the form of a valid passport or Right to Work documentation.

Our Commitment: This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending 30 June 2023. It will be reviewed and approved by the Board of Directors and updated annually.



Signed: .....

Job Title: ..... DIRECTOR

Date: ..... 11/10/23