

	Document Title:	Human Rights and Anti-Slavery Policy Statement		
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HUMAN RIGHTS and ANTI-SLAVERY STATEMENT

Introduction From the Chief Executive Officer

Slavery and human trafficking are a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our colleagues are expected to report concerns and management are expected to act upon them.

Scope

This policy applies to all at the Delta Group. We also expect our suppliers to acknowledge, abide and adhere to this policy.

Principles

We will seek to avoid impeding or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner. In addition to this we also seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships; as well as provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts.

We shall continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

Organisation's Structure

The Delta Group are Europe's leading visual communication business, experts in advising on, creating, producing, activating and analysing a broad range of point-of-purchase and related visual communications across the entire in-store and out-of-store marketing value chain. The Group delivers seamless end-to-end marketing solutions from managed studios through to print and installation. The Delta Group works in close collaboration with clients and always has a focus on commercial objectives. Our offering is encapsulated in the business' strategic methodology:

- Insight
- Create
- Produce
- Execute
- Optimise

Our Business

- The Delta Group consists of a number of Companies based within both the UK and Ireland. These include:
 - Moving Print Distribution (MPD Ireland)
 - Delta Display Ltd
 - Delta Creative (formerly Lick Creative Ltd and Zone)
 - Digital Viscom

- Odessa Print Group
- Superior Creative Services

Our Supply Chains

Our supply chain includes the sourcing of raw materials, principally related to the provision of Point of Purchase visual communications.

Our Policies on Slavery & Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-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.

Due Diligence Process for Slavery & Human Trafficking

As part of our initiative to identify and mitigate risk we:

- Where viable, we manufacture in house to ensure optimum control of the work environment;
- Where possible we build long-standing relationships with local suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the chain, ultimately to the field or utility generator.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

Effectiveness In Combating Slavery & Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Tier one vendor partners provide the initial self-audit of each site which is then inspected by The Delta Group annually for verification.
- Use of labour monitoring and payroll systems; and
- Upon appointment as a vendor with The Delta Group, the vendor undertakes a period of on-boarding to establish frequent communication, regular updates and sharing of expectations including policies. Regular communication continues throughout the lifespan of the relationship with The Delta Group.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Child Labour

The Delta Group will not tolerate the use of child or forced labour within its operations or facilities. We will not tolerate the exploitation of children, their engagement in unacceptable or hazardous work, and the physical punishment, abuse or involuntary servitude of any worker.

We expect our suppliers and contractors to uphold the same standards. Any breaches of these principles which become known to the Delta Group could lead to the discontinuing of the business relationship.

Any internship, work placement or seasonal employment of young people will be coordinated with their school or educational facility ensuring that they are closely supervised and that their morals, safety, health and compulsory education are not compromised in any way.

Child Labour Remediation

In the event that a child worker is found within the Delta Group or within its supply chain our remediation would always consider the best interests of the child and would include the following steps:

- Explaining to the child why they should not be working, or why they cannot work in the job role.
- Talking through with the child what would happen to their role, their employment status, their income etc.
- Supported through this process ensuring that they understand the reason that they should not be working.
- Offering support via the Employee Assistant Programme including counselling services, legal advice etc.
- Ensuring the child has the appropriate protections as required by local law, to ensure their rights are upheld.
- If there is evidence of criminal activity or trafficking the appropriate authorities would be informed, the child should be placed into the care of the local authorities for their safety.
- If a young worker is found to be working in hazardous conditions, or involved in night work, explain to them why they cannot work in that role, and an alternative position should be found which meets the criteria for the employment of young workers.
- Whilst any investigation is ongoing, ensure that the child is not at a financial loss; ensure that compensation is being paid for any lost earnings and other costs such as accommodation, food and utilities.
- If appropriate discuss the process for a return to the job role when they are no longer a child.
- If possible, offer the job to an adult member of the family so that the family income is retained.
- Ensuring that a focus is placed on supporting the child, the company and the supplier if appropriate
- Follow Up with suppliers if appropriate - for example - recruitment & training to address gaps in the hiring process which have allowed the child to start work on-site. How to verify the right to work and ID documentation to confirm an applicant's age.

- Ensuring that the supplier carries out a Root Cause Analysis to understand how the child was able to start working on-site. This should aim to understand the child's recruitment pathway and the gaps in the hiring process that enabled them to access employment.

Health and Safety

All staff at the Delta Group have been safely trained to always work in an environment that is both safe and in line with our Health and Safety Policy.

Recruitment

We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will.

Working hours

We ensure that working hours are tolerable, comply with the law/regulations and in line working time directives and industry standards

Agency workers

At the Delta Group we only use 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.

Freedom of Association

Every employee at the Delta Group is free to belong to and to participate in the activities of any association, society, organisation, club or group without censure or disciplinary action by the Delta Group/Employer, subject only to the limitation that such membership and activity shall not interfere with the performance of the employees' responsibilities, duties, or work obligations.

Communication openings

We encourage staff to communicate with us and have a few platforms to make this happen to ensure we have open and direct lines of communication with management throughout the business.

- Employee elected representatives can raise any concerns with our Senior Management Team, via community meeting forums that takes place every quarter.
- We also have a 'Your View' survey that is released every year, this is anonymous, confidential, and managed by an external Company. The aim is that the '**Your View**' survey lets us know how staff feel about working for the Delta Group and drives actions and initiatives that make here a better place to work. It's important to get as many responses as we can from our employees across the Group so we have a few ways that staff can submit this.
- In addition to this we hold health and safety committee meetings to engage with employees on any concerns they have relating to any H&S matters.

Open door policy

We operate an open line of communication practice here at The Delta Group where everyone can easily raise issues to feel heard and supported. This workplace standard allows for communication and trust throughout the company.

Equality of treatment

The Delta Group does not condone any form of inequality, non-inclusion, harassment, or bullying and is committed to encouraging equality, diversity and inclusion amongst our workforce and eliminating any unlawful discrimination, our aim is for our workforce to be truly representative of all parts of society and for each employee to feel respected and able to give their best.

The purpose of our policy is to inform staff of the type of behaviour that is wholly unacceptable and to explain what options there are if anyone is to suffer from inequality, non-inclusion, harassment or bullying at work, this includes whether it's during training, recruitment and/or working conditions etc. The process and options are outlined in our equality, diversity and inclusion policy.

In addition to this the Delta Group also has a zero-tolerance approach to modern slavery in our organisation and our supply chains and disallows physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

Disciplinary and grievance procedures are clearly detailed and communicated to all employees in our employee handbook. All disciplinary measures are logged and handled accordingly.

Internal processes to prevent the use of child labour within the Company

- Educating employees on child labour and human trafficking.
- Ensuring that hiring managers avoid hiring minors under the legal age of working.
- Ensuring that Managers understand the policy and legislation on minimum wage and working hours.
- As part of the recruitment process checking and retaining as part of the right to work process, - documents verifying an employee's age and ID.
- Conducting checks on employees' salaries, right to work and working hours during HR / Company audits to ensure that these are in line with the relevant minimum wage and working time legislation.

Grievance and process to make things right

Where a human rights violation is recognised, we'll work with all parties concerned to make things right; we'll investigate all avenues and ensure justice is supported for the victim. We'll also explore the root cause so that we can take appropriate steps to prevent such a violation reoccurring.

Staff can report any unethical behaviour anonymously should they feel can't be resolved locally or for which the normal internal process is not suitable. Anyone raising a genuine concern which is in the public interest will be protected from victimisation. Third parties (including suppliers) can also follow our processes to report.

Code of Conduct

We at the Delta Group make it clear of the actions and behaviours expected of them when working and representing the Organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour

Discipline

Any member of staff failing to adhere to our Anti-slavery policy, or being involved in the threat of physical, sexual or any other abuse or other forms of intimidation will be subject to our disciplinary sanctions, which will be managed in line with our disciplinary process and policy.

Conclusion

Slavery and Human Trafficking are serious crimes; therefore, the Delta Group are pleased to submit this policy and our statement outlining our commitment.

Implementation and Approval

This policy is made pursuant to section {54;1} of the modern slavery act 2015 and has been approved by the CEO/Exec Board who in conjunction with our HR department and Compliance team will review and update annually regarding its relevance and effectiveness and will make improvements as required.

Our Human Rights Policy and our Anti-Slavery Statement are both accessible to our staff, our multiple sites via the HR System, and to other interested parties via our website, or on request.

Signed:

A handwritten signature in black ink, appearing to read 'Jason Hammond', written in a cursive style.

Jason Hammond | Chief Executive Officer
20th March 2022