



Modern Slavery Statement 2015 (Act)

Introduction

Spirit Media Scotland Ltd (**Spiritmedia**) is a full service creative media agency

providing marketing, media and associated services from its office in Edinburgh.

Spiritmedia is committed to growing in a sustainable and ethically responsible way. Spiritmedia is committed to conducting business with integrity and to the highest ethical standards, respecting human rights and protecting the interests of Spiritmedia, employees and society in general.

As such, Spiritmedia has zero tolerance of modern slavery and human trafficking and is committed to doing all it can to ensure no form of slavery or human trafficking exists within its supply chain. Spiritmedia expects the same from everyone it does business with and will not knowingly engage with any person or organisation suspected of being involved in modern slavery or human trafficking in any form.

Supply chain

Suppliers include but are not limited to:

- media partners;
- IT services and equipment providers;
- facilities management and office suppliers

Policies and procedures

Spiritmedia is committed to work within applicable laws and as the Act is an integral part of the UK legal framework its requirements are reflected in its policies.

The Spiritmedia policies that incorporate the values and objectives of the Act are as follows:

Spiritmedia is committed to conducting business with honesty and integrity and upholding high standards to protect the interests of its employees, clients, stakeholders and communities in which they work. All employees are required to behave consistently with the Code of Conduct.

- **Equality Policy** – This states Spiritmedia's commitment to uphold fair employment practices and observe the laws that pertain to, among others, the prohibition of forced, compulsory and child labour and the laws relating to the elimination of any improper treatment or discrimination of employees.

STEPS TAKEN BY SPIRITMEDIA TO COMPLY WITH THE ACT:

Waterview House, 37 The Shore
Edinburgh EH6 6QU

Tel: 0131 473 3456
www.spiritmediaworks.co.uk

Registered in Scotland No: SC226495
VAT No: 789863542





Supplier due diligence

Prospective suppliers are required to confirm their compliance in relation to the requirements of the Act during initial negotiations. This is to ensure that Spiritmedia only engages with those suppliers who share and are fully aligned with its values and principles.

Training

Spiritmedia's Managing Partners have communicated to all staff about the need to be vigilant about Spiritmedia's obligations under the Act when procuring goods and services.

Responsibility for compliance with our policies

Spiritmedia's Managing Partners have the overall responsibility for Spiritmedia's compliance with the Act.

Measuring effectiveness in combatting modern slavery and human trafficking

The effectiveness of the steps taken will be measured by the following key performance indicators (KPIs):

- number of instances of reports being received from employees, the public or law enforcement agencies that modern slavery and human trafficking practices have been identified within the Spiritmedia business.

Next steps

As part of Spiritmedia's ongoing efforts to ensure there is no modern slavery or human trafficking in its supply chain, it intends to continue to review and monitor and, where necessary, enhance its systems, policies and procedures, as well as improve its training and communications about the Act across the business.

Declaration

This statement is made in accordance with section 54(1) of the Act. This statement has been approved by the Spiritmedia Board of Directors and constitutes Spiritmedia's modern slavery and human trafficking statement up to the date of publication of this Statement.

Philip Jones

Managing Partner

For and on behalf of the Board of Directors

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