



## **Fishawack Limited Modern Slavery Statement**

March 2019

### **Introduction**

Modern slavery is the illegal exploitation of people for personal or commercial gain. It can take many forms such as forced and compulsory labour, servitude, slavery and trafficking. The UK Modern Slavery Act 2015 was introduced to tackle slavery and human trafficking through the consolidation of previous legislation and the introduction of new measures. It introduces new requirements for organisations' business and supply chains. Fishawack Limited is committed to acting ethically and with integrity in all our business dealings and relationships, and to this end are committing to our Anti Modern Slavery Policy. Every supplier and employee working with Fishawack Limited has the right to live and work with dignity and respect, in decent and safe conditions, and to earn fair rates of pay. We have a responsibility to ensure good social and ethical practices within our own operations and within our supply chain.

### **Policy Statement**

The Fishawack Group does not tolerate any use of slavery within its business and we expect our officers, employees and those providing services to, for, or on behalf of the Group to conduct themselves in accordance with our policy.

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this commitment, we have implemented effective systems and controls to reduce the risk of modern slavery taking place anywhere in our own business or in any of our supply chains.

Our Modern Slavery policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **Organisational Structure and Supply Chains**

Fishawack Limited operates through Fishawack Medical Communications and Fishawack Creative under a number of registered business entities in the UK and other jurisdictions. Given the nature of our business in these countries and that most of our people are direct employees, we believe that the risk of trafficking or modern slavery is very low in our sector. Training on Modern Slavery, our policies and associated procedures is mandatory for all employees of the Group.

Our divisions source both direct goods and indirect services from a number of external suppliers. The Group ensures that understanding the potential risk of modern slavery in our supply chain is a critical part of our policy. As part of this, our businesses are expected to follow standardised procedures in the selection of suppliers. All suppliers are expected to be able to evidence compliance with the Modern Slavery Act as outlined in our Third-Party Code of Conduct. We continue to review our suppliers with regard to compliance in this area.

### **Responsibility for the Policy**

The Compliance and Human Resources teams have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. All employees are responsible for ensuring that all dealings with suppliers comply with our policy.

Throughout our business we undertake our own recruitment practices and ensure all terms of employment are voluntary. Where there is a need to source labour from external companies, we only work with reputable

employment agencies to do so and we carry out appropriate background checks for all employees. Where necessary, and if required, we may request demonstration of compliance with this policy. We always verify the practices of any new agency that we work with and always request evidence of compliance with this policy through acceptance of our Third-Party Code of Conduct.

### **Compliance with the Policy**

The Group is committed to conducting its business with honesty and integrity and it expects all staff to maintain high standards at all times. Our whistleblowing policy facilitates the reporting of any suspected wrongdoing or dangers in relation to the Group's activities. Our policy aims to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, and we will support any whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

### **Due Diligence Process**

The compliance team will review the progress on the Modern Slavery Policy and required training on an annual basis. Key Performance Indicators on this topic are incorporated into our Environmental, Social and Governance monitoring and are reported on an annual basis. Our Modern Slavery Statement is available on the website for all business entities within the Group.

This statement was approved by the board of Fishawack Limited on 31 March 2019 and signed by Rachel Davies, General Manager, Medical Communications.

A handwritten signature in cursive script that reads "Rachel Davies".

This statement will be reviewed each year in conjunction with our financial year which runs from 1 April to 31 March.