

# MODERN SLAVERY STATEMENT

## 1. WHAT IS MODERN SLAVERY

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery can take many forms, including forced labour, slavery, servitude and human trafficking.

This crime can manifest itself in many ways, but what each of its forms will have in common is the exploitation of a person for another person or another person's (or organisation's) benefit.

The Modern Slavery Act 2015 ("MSA") consolidates anti-slavery and human trafficking offences into one piece of legislation.

### **Under the MSA it is an offence to:**

- (a) Hold another person in slavery or servitude or require another person to perform forced or compulsory labour;
- (b) Arrange or facilitate the travel of any person across borders with a view to that person being exploited (i.e. conduct or be involved in human trafficking); or
- (c) Commit an offence with the intention to commit human trafficking

This statement is made pursuant to Section 54 (1) of the MSA and has been adopted by Festival 2022 Ltd as our statement on modern slavery and human trafficking for the financial year ending 31 March 2022. The Board approved this statement at its meeting on 3 March 2021.

## 2. OUR SUPPLY CHAIN AND THE ASSESSMENT OF RISK

Given the nature of the Festival 2022 Ltd.'s business, the risk of modern slavery in our supply chain is considered low. However, we are not complacent about this risk and will take active steps to ensure that our suppliers, consultants and contractors, throughout our supply chain, are not engaging in any form of modern slavery and human trafficking.

We accept that no part of our business is immune to the risks of modern slavery and human trafficking and we will not support or do business knowingly with a company involved in any form of modern slavery or human trafficking.

All persons working for the Festival 2022 Ltd must comply with our Anti-Slavery and Human Trafficking Policy. This policy sets out the steps we take to reduce the risk of modern slavery and human trafficking in all parts of the Festival 2022 Ltd.'s business and supply chains. We take compliance with this policy very seriously and any Festival 2022 Ltd employee or Director who breaches this policy will face disciplinary action. Our Procurement Policy details the actions we take to combat modern slavery and human trafficking in our supply chain and to embed the mitigating controls in our daily operations.

Before commencing a procurement process, we use a series of key characteristics to identify the risk of modern slavery to the relevant contract so we can seek to ensure that the subsequent procurement and contract management activity is proportionate.

As a contracting authority defined by and regulated by the Public Contracts Regulations 2015, all our tenders include the Standard Selection Questionnaire (SQ) which includes a mandatory exclusion question regarding compliance with the Modern Slavery Act 2015. We may require proposed suppliers to provide us with evidence of compliance with anti-slavery and human trafficking laws, such as details of workforce conditions in their factories or evidence of the processes they have in place to identify modern slavery risks in their supply chains. We may also require proposed suppliers to complete a specified Modern Slavery Assessment Tool.

In our supply contracts and standard terms of business we have included express terms requiring our counterparties to comply with the MSA and our Anti-Slavery and Human Trafficking Policy, to implement procedures for its own personnel and suppliers to ensure there is no slavery or human trafficking in its supply chains, and to notify us if it becomes aware of any slavery or human trafficking in a relevant supply chain. We have also included provisions in our supply contracts which allow us to inspect and conduct an audit of a supplier's and its sub-contractors' premises to monitor compliance with the supplier's obligations to comply with anti-slavery and human trafficking laws.

In addition, we require all current suppliers to make positive written affirmations that (i) they do not; and (ii) their direct supply chain does not endorse enable or facilitate human trafficking or slavery within their business, and we have built this requirement into our supplier process.

Failure by a supplier to comply with the processes described above will lead to an investigation and may result in the supplier's contract being terminated.

Festival 2022 Ltd has not highlighted and/or experienced any modern slavery issues within its supply chain to date.

### **3. OUR POLICIES & PROCESSES**

Our policies reflect our commitment to pay employees fairly and properly for their work, act with integrity and ethically in our business relationships and use best endeavours to enforce effective systems and controls across our supply chains.

Our employees are subject to, and benefit from, a wide range of policies including, anti-slavery and human trafficking, workplace behaviour, disciplinary action, grievance and complaints, equal opportunities diversity and inclusion, and numerous other compliance policies. We also have a staff code of practice. All of our policies are subject to an equality impact assessment.

We operate a whistleblowing policy that enables anyone to raise any concerns and to have those concerns investigated. We also operate an exit interview process which provides staff with another forum to raise any concerns they may have about working practices.

We confirm the identities of all new employees and undertake employment checks to ensure they have a right to work in the United Kingdom.

As part of our ongoing commitment to understanding the risk of modern slavery and human trafficking, our Procurement staff will be receiving training in this area.

The policies and frameworks that we have in place limit the risk of modern slavery and human trafficking in the workplace and encourage all staff to work and act ethically.

### **4. CONTINUOUS IMPROVEMENT**

As part of our ongoing commitment to eliminating modern slavery and human trafficking, we understand and recognise that our own circumstances and those of our suppliers are constantly evolving. We will continue to review our processes and assessments in relation to modern slavery and human trafficking to ensure they are fit for purposes, as part of our established risk framework; both as an employer and a purchaser of goods and services.

### **5. ANNUAL REVIEW**

Festival 2022 Ltd will conduct an annual review of this Statement and the actions it takes to combat all forms of modern slavery and human trafficking in its supply chain. This statement was signed by the Festival's Chair, Dame Vikki Heywood CBE, on 5 March 2021.