

Modern Slavery Statement



Modern slavery is a very real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery.

Every company is at risk of being involved in this crime through its own operations and its supply chain.

Although C21 Creative Communications Ltd does not have clients or suppliers in developing countries we nonetheless operate a zero-tolerance approach to modern slavery and we are fully committed to preventing slavery and human trafficking if we come across it in our day to day business operations.

C21 is a Creative, Digital Communications agency working with a number of clients in a variety of industries both large and small, local and global, including Housing, Healthcare, Public Sector, Tissue Paper Hygiene Products, Sports Event Management and Charities to name a few.

We use a number of suppliers based in the UK that we have established strong relationships of trust and integrity with over the years. Our supplier selection criteria includes due diligence of the supplier's reputation, respect for the law, compliance with environmental standards and the health and safety of all their employees.

We have not been made aware of any allegations of human trafficking or slavery activities against any of our clients or suppliers, but if we were, then we would act immediately and report it to the authorities.

Risk assessment

We conduct a risk assessment of our customer base and supply chain on a regular basis by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the client/ suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of work and human rights groups

This assessment will determine our response and the risk controls that we implement.

C21 operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- Ethical Policy - We encourage employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when conducting business with both clients and suppliers

Due diligence

C21 conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals.

This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts

We require all suppliers to verify that:

They comply with a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in their day to day operation and supply chain.

A handwritten signature in black ink, appearing to read 'Christina Clarke'.

Christina Clarke

Managing Director