

Modern Slavery & Human Trafficking Statement



Group PLC

Innovation Quality Service
since 1928

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a 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. We understand that every company is at risk of being involved in this crime through its own operations and its supply chain.

At SMP Group plc, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand potential modern slavery risks related to our business, and to implement steps where feasible to prevent slavery and human trafficking during the year to 31st December 2022.

Our business and supply chains

SMP Group plc are one of the largest and most respected producers of printed point of sale materials and the largest producer of printed out of home advertising in the UK. We have over 90 years' experience and operate with a highly skilled and motivated team of 200 colleagues from our manufacturing site in London, and from client focussed locations throughout the UK. We service clients throughout the UK and Europe.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and onboarding procedure includes due diligence of the supplier's compliance with health, safety and environmental standards, and references. We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.



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Risk Assessment

In the past year, we revised our risk assessment of our key supply chain partners by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups

This assessment has determined our response and the risk controls that we implement.

With the well publicised supply chain and issue of 2021, that still persist into 2022, we have brought a wider group of suppliers into this review.

Policies

SMP Group plc are members of SEDEX, subject ourselves and key suppliers to ethical audits carried out by an independent auditor, and as a business subscribe to the ETI Base Code. This informs our approach to policy development. We operate 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
- Code of Conduct - our code encourages 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 managing our supply chain
- Purchasing Code - we are updating our Purchasing practices and supplier contracts to make explicit reference to slavery and human trafficking, and are recruiting additional resource into this area of our business.



Supplier Due Diligence

SMP Group plc seeks to conduct proportionate due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals, based on a perception of risk. This includes where considered appropriate:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, and where considered appropriate their labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to confirm that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment



Awareness

SMP Group plc has raised awareness of modern slavery issues by putting up posters across our facilities explaining the risks, tell tale signs and where to get help. These are multilingual and are replicated in discreet locations where the risk profile with agency labour is higher. From time to time we circulate an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, SMP Group plc has committed to various on site and e-learning courses to all employees, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps SMP Group plc will take if a supplier fails to implement anti-slavery policies or controls



Measuring how we're performing

SMP Group plc has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include but are not limited to:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?

Any concerns or issues raised by external auditors?

This statement covers 1 October 2019 to 31st December 2022 and has been approved by the board of SMP Group plc at the board meeting on 8th March 2022.

B Slade

Managing Director

8th March 2022



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