

MODERN SLAVERY POLICY

(2024 - 2025)



Turtle Media and Marketing Ltd ("the Company") is committed to acting ethically and with integrity in all business dealings and relationships. The Company strictly opposes all forms of modern slavery, including forced labour, human trafficking, and child labour. This policy is intended to ensure that all members of Turtle Media and Marketing Ltd understand the Company's zero-tolerance stance towards modern slavery and are equipped to identify and address risks related to it.

Turtle Media and Marketing Ltd expects all employees, contractors, and suppliers to comply with this policy, which is underpinned by the Modern Slavery Act 2015 and other relevant legislation.

2. Scope of the Policy

This Modern Slavery Policy applies to:

- **Employees and Contractors:** Including all full-time, part-time, and temporary staff, as well as contractors and subcontractors working on behalf of Turtle Media and Marketing Ltd.
- **Suppliers and Partners:** Any third-party entities providing goods, services, or support to Turtle Media and Marketing Ltd, including suppliers, service providers, consultants, and vendors.

This policy covers all aspects of the Company's operations and supply chains to ensure that modern slavery practices are neither present in its direct operations nor within the Company's suppliers' networks.

3. Definition of Key Terms

- **Modern Slavery:** Encompasses slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve the exploitation of people for personal or commercial gain.
- **Forced Labour:** Situations where individuals are coerced to work against their will through threats, violence, or deception.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of people by improper means, including force, fraud, or coercion, with the intent of exploiting them.
- **Child Labour:** Work undertaken by children that deprives them of their childhood, education, or that is harmful to their physical and mental development.

4. Company Commitment

Turtle Media and Marketing Ltd is committed to:

1. **Zero Tolerance:** The Company maintains a zero-tolerance policy toward modern slavery and expects the same commitment from all employees, suppliers, and business partners.
2. **Supply Chain Due Diligence:** Conducting regular and thorough due diligence on suppliers, partners, and contractors to assess their compliance with anti-slavery measures.
3. **Training and Awareness:** Providing training to employees to raise awareness of modern slavery and equip them with the knowledge to identify and report potential risks.
4. **Risk Management and Mitigation:** Regularly assessing areas of the business and supply chains to identify any risk of modern slavery and implementing preventative measures.
5. **Transparency and Reporting:** Ensuring transparent reporting and actively encouraging employees, suppliers, and contractors to report any concerns regarding modern slavery.

5. Identifying and Assessing Risks

The Company recognises that certain business activities and supply chains may be more susceptible to modern slavery risks. Therefore, Turtle Media and Marketing Ltd is committed to identifying potential risk factors by:

- **Mapping Supply Chains:** Understanding the origins of all materials and services to ensure compliance with ethical standards throughout the supply chain.
- **Supplier Evaluation:** Assessing the modern slavery policies and practices of current and prospective suppliers, prioritising high-risk sectors and geographies.
- **Risk Assessment:** Regularly reviewing and assessing risks associated with all suppliers, contractors, and high-risk areas within the Company's operations.

6. Supplier Code of Conduct

Turtle Media and Marketing Ltd has established a Supplier Code of Conduct that outlines expectations for all suppliers and partners in relation to modern slavery. This code mandates that:

- **Compliance with Laws:** Suppliers must comply with the Modern Slavery Act 2015 and other relevant laws and regulations.
- **Fair Treatment and Remuneration:** Suppliers must ensure that all workers are paid fairly, work voluntarily, and have freely chosen employment.
- **No Exploitation:** Suppliers must guarantee that their own supply chains do not involve forced labour, bonded labour, or child labour.
- **Transparency:** Suppliers must allow for inspections, audits, and the disclosure of relevant records to verify compliance with anti-slavery policies.
- **Reporting Mechanisms:** Suppliers must implement mechanisms that allow their employees to report modern slavery concerns without fear of retaliation.

7. Training and Awareness

To foster a culture of awareness and ensure that employees can identify and report instances of modern slavery, Turtle Media and Marketing Ltd provides training and information, including:

- **Induction Training:** All new employees receive training on the Company's modern slavery policy and reporting channels.
- **Ongoing Training:** Regular training sessions are provided to help employees stay up-to-date with the Company's modern slavery policies and procedures, with a particular focus on employees who work closely with suppliers or in high-risk areas.
- **Resource Access:** Information on identifying and reporting signs of modern slavery is accessible to all employees, including posters, digital resources, and guidance documents.

8. Reporting Modern Slavery Concerns

Turtle Media and Marketing Ltd encourages all employees, suppliers, and stakeholders to report any concerns related to modern slavery. Reporting mechanisms include:

1. **Internal Reporting:** Employees can report concerns to their line manager or to the Human Resources (HR) department, who will escalate the matter if necessary.
2. **Anonymous Reporting:** Anonymity will be respected whenever possible, and individuals can report concerns confidentially without fear of retribution.
3. **Third-Party Reporting:** Suppliers and third-party contractors are encouraged to contact the Company's designated contact for modern slavery concerns if they observe any unethical practices within Turtle Media and Marketing Ltd's supply chain.

9. Investigation and Response

When a report or suspicion of modern slavery is raised, the Company is committed to taking swift and decisive action:

1. **Investigative Process:** The HR department or a designated investigation team will review the concern, gather evidence, and interview relevant parties. External specialists may be consulted if required.
2. **Corrective Actions:** If modern slavery practices are identified within the Company's supply chain, Turtle Media and Marketing Ltd will work with the supplier to remediate the situation. Persistent non-compliance will result in termination of the business relationship.
3. **Documentation and Reporting:** All concerns, investigations, and responses will be documented and securely stored to facilitate auditing and compliance with legal obligations.

10. Accountability and Governance

Accountability for the implementation and oversight of this policy lies with the Company's senior management team, who are responsible for ensuring compliance across all areas of business. Senior management is tasked with:

- **Reviewing Compliance:** Conducting regular reviews of the effectiveness of this policy and making improvements as needed.
- **Annual Statements:** Publishing an annual statement on the Company's website detailing the steps taken to prevent modern slavery in the past year, in compliance with the Modern Slavery Act 2015.
- **Policy Enforcement:** Ensuring all employees and suppliers are aware of, understand, and comply with this policy.

11. Monitoring and Reviewing

Turtle Media and Marketing Ltd regularly monitors and reviews this policy to ensure that it reflects current best practices and legislative requirements. This includes:

- **Annual Review:** Conducting an annual review to identify any areas for improvement and update the policy based on emerging risks and regulatory changes.
- **Supplier Audits:** Performing regular audits of high-risk suppliers and requesting compliance evidence to confirm adherence to anti-slavery standards.
- **Continuous Improvement:** Leveraging feedback from employees, suppliers, and industry insights to continually improve the Company's anti-slavery measures and mitigate risks.

For any enquiries regarding our policy, please feel free to reach out using the contact information provided below.

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Signed by:

Francis Pybis – Director



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