

Open Partners 

# POLICY

# *Anti Modern Slavery & Human Trafficking Statement*

**Updated on:** 17th June 2026

**Frequency of Review:** Every 12 Months

**Policy Owner:** Chief Finance Officer

**Policy Manager:** Accounts Payable Associate Partner

**Reviewed By:** GL / JB

## **Introduction**

This statement is made pursuant to section 54(1) of the **Modern Slavery Act 2015** and sets out the steps Open Partners has taken to ensure that modern slavery and human trafficking are not taking place in our business or supply chains.

At Open Partners, we are committed to conducting our business ethically and with integrity. We recognise our responsibility to take a robust approach to preventing modern slavery and human trafficking in all our operations and supply chains.

## **Our Business**

Open Partners is a marketing and communications agency based in the UK. We provide strategic, digital, branding, media and creative services to clients across a range of sectors. While we do not operate in high-risk industries, we recognise that risks of modern slavery can exist in any supply chain.

## **Our Supply Chains**

Our supply chains include:

- Freelance and contract creative professionals
- Production companies and studios
- Marketing and print suppliers
- IT and software providers
- Office facilities and support services

We work with suppliers primarily based in the UK and other low-risk jurisdictions but remain vigilant about the potential for labour exploitation and unethical practices, acknowledging that modern slavery risks can extend across multiple tiers of subcontractors and material providers.

## **Our Employment & Recruitment Practices**

We operate a robust human resources framework to prevent labor exploitation within our own corporate footprint:

- **Right to Work Checks:** We conduct stringent identity and legal eligibility-to-work checks for all permanent, contract, and freelance personnel prior to onboarding.
- **Vetted Agencies:** We only source freelance talent and contract professionals through reputable recruitment agencies that explicitly commit to compliance with the Modern Slavery Act 2015.
- **Fair Pay:** We ensure all staff and direct contractors are compensated in strict compliance with UK National Minimum Wage and Living Wage regulations. We are a certified National Living Wage employer.

## Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains. Our relevant internal policies, which can be found in the Staff Handbook, include:

- **Procurement Policy**
- **Diversity, equity and inclusion policy**
- **Whistleblowing Policy** – enabling staff and suppliers to report concerns anonymously
- **Code of Conduct** – outlining expected standards of behaviour for staff and suppliers

## Due Diligence and Risk Assessment

We conduct due diligence on new suppliers and partners, including:

- Requiring suppliers to confirm compliance with the Modern Slavery Act
- Assessing risks based on the nature of the goods/services and geographic location
- Reviewing publicly available information and accreditation (e.g., Sedex, ISO)

## Training and Awareness

We provide training to relevant staff to raise awareness of modern slavery and how to identify and report concerns. Employees involved in procurement or supplier management receive additional guidance on assessing risks in the supply chain.

## Measuring Our Performance (KPIs)

To evaluate the effectiveness of our anti-slavery measures, we monitor the following indicators annually:

- **Training Metrics:** Aiming for a 100% training completion rate for all personnel working directly in HR, procurement, and talent acquisition.
- **Grievance Tracking:** Monitoring issues flagged via our grievance process and whistleblowing channel.

## Ongoing Commitment and Monitoring

We are committed to continually improving our practices and will:

- Review our suppliers and risk assessments annually
- Strengthen contractual obligations with suppliers around anti-slavery compliance
- Encourage greater transparency throughout our supply chain

## Board Approval

This statement was approved by the Board of Directors of Open Partners. It will be reviewed and updated annually.

## Signed:



Jonathan Brown, Chief Finance Officer  
Open Partners  
17th June 2026