

Modern slavery and human trafficking statement

Introduction

Create/Change is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors and partners.

This statement sets out the Company's actions to understand all potential modern slavery risks related to its business.

Organisation structure and background

- Create/Change was established in 2016 and is an Information Technology Consultancy
- The Company holds Cyber Essentials Plus
- The Company does not operate any subsidiary organisations
- The Company's headquarters are in London, United Kingdom

Key statements

- The Company acknowledges responsibility to the Modern Slavery Act 2015;
- The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking;
- The Company is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking;
- The Company will ensure transparency within the organisation and with suppliers of goods and services to the organisation;
- The Company Directors and Senior Management take responsibility for implementing this statement and its objectives.

Company Employees

- The company recognises the importance of making sure employees are fully aware and trained on our modern slavery policies. We don't currently have any employees, however, when we do, the company will work with a HR Consultant to ensure we meet all legal requirements and all employees will be provided with a written contract of employment and undertake training in relation to our ethical code and standards.
- Each employee has a personal responsibility to read the policies and procedures as well as to ensure that they fully understand our obligations and the consequences associated with any breach of those obligations.
- Adequate resources will be provided (including training as necessary) and investment to ensure that slavery and human trafficking is not taking place within the Company nor within its supply chain.
- The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- The Company's documentation makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

Suppliers and Procurement

- The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics.
- The use of service provider contractors in the Company largely relates to provision of digital consultancy services.

- The Company also uses IT contractors in parts of the business and does not enter into individual arrangements for these roles, instead engaging with reputable IT sourcing companies.
- Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.
- Serious violations will lead to the termination of the business relationship.

Recruitment/Agency workers

- The organisation will use only specified, reputable businesses to source labour and always verifies the practices of any new business it is using before accepting workers from that agency.

Due diligence

This policy statement takes into account and supports the policies, procedures and requirements documented by our company handbook.

Approval

This statement has been approved by the Company's Founding Partners who will review and update it annually.

Director's signature:

DocuSigned by:

5B462921A9484B5


Director's name:

Mark Dalgarno

Date:

10/05/2022

Director's signature:

DocuSigned by:

B1AB40C6754113A

Director's name:

Darius Pocha

Date:

12/05/2022