

MODERN SLAVERY POLICY

INTRODUCTION

At Sleeping Giant Media, we recognise that slavery is not just a crime of the past but a pressing modern concern that requires continuous action. Our commitment extends beyond our internal operations to the evaluation and scrutiny of our partnerships, client base, and supply chains to prevent exploitation and human trafficking.

IDENTIFICATION

Sleeping Giant Media shall be defined as Sleeping Giant Media Limited, Pocket Giant Limited, Giant Campus Limited, and Percussion Group Limited collectively.

OBJECTIVE

The objective of this policy is to highlight areas most vulnerable to modern slavery, establish best practices for avoiding, reporting, and condemning activities that contravene the Modern Slavery Act (MSA) 2015, and ensure that Sleeping Giant Media remains vigilant in safeguarding against these practices.

POLICY

1. Definition of slavery

The Modern Slavery Act (MSA) 2015 outlines four activities:

1. Slavery - Exercising powers of ownership over a person.
2. Servitude - Imposing services through coercion.
3. Forced or compulsory labour - Forcing work under threat with no voluntary offer.
4. Human trafficking - Facilitating travel for exploitation purposes.

This policy addresses all these activities.

2. Responsibilities

Sleeping Giant Media, its managers, and all employees ("Giants") share the responsibility of ensuring that everyone is safeguarded, treated fairly, and with dignity. The policy outlines clear duties:

- **Sleeping Giant Media:**
 1. Maintain and communicate clear policies against exploitation and human trafficking.
 2. Implement rigorous recruitment policies.
 3. Evaluate supply chains, ensuring compliance with the Modern Slavery Act.
 4. Conduct appropriate checks on employees and suppliers.

5. Ensure grievance processes are transparent.
 6. Raise awareness about the company's efforts to protect employee welfare.
 7. Demonstrate a firm stance against slavery through an anti-slavery statement.
- **Managers:**
 1. Be approachable, listen to concerns and report incidents when necessary.
 2. Act appropriately on reports of potential exploitation.
 3. Remain vigilant to indicators of slavery.
 4. Ensure all employees are aware of their responsibilities under this policy.
 - **All Employees (Giants):**
 1. Be observant and report suspicions of slavery or forced labour.
 2. Follow reporting procedures if exploitation is suspected.
 3. Provide feedback on ways to improve the company's preventive measures.

3. Identifying slavery

Slavery in the modern era can be difficult to ascertain - there is no "typical" victim, and some may even not realise they are being exploited or that they are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

It may not be the case that anyone exhibiting the above behaviours is a victim of slavery or trafficking, though, and so it is best you approach the situation cautiously. If you feel something isn't right, or you have a suspicion, report it to the People Team who will follow our reporting procedures.

4. Risks and procedures

Sleeping Giant Media states to its suppliers that we are not prepared to accept any form of exploitation. We identify key risk areas related to slavery and human trafficking, particularly within our supply chains and recruitment.

The company employs the following measures to mitigate these risks:

- Conduct due diligence in the supply chain by requiring Anti-Slavery Policies from suppliers, communicating with on-site staff, and conducting supplier research.
- Use reputable recruitment agencies that comply with the Modern Slavery Act 2015.
- Ensure that all employees have valid contracts and are legally allowed to work in the UK.
- Provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

Sleeping Giant Media uses recruitment agencies on occasion. When there is a need, it only uses reputable companies, and expects them to adhere to the same standards as Sleeping Giant Media.

Sleeping Giant Media expects for all our recruitment agencies:

- To fully comply with the Modern Anti-Slavery Act 2015;
- To be free from ethical ambiguities;
- To be transparent, accountable and auditable.

If the Company has reason to believe that any recruitment agency has failed to meet these standards, the People Team should be informed and any contracts with them would be terminated.

We keep agents on the list under regular reviews.

If any suspected exploitation arises, the People Team will follow established reporting procedures.

5. Reporting slavery

If you see something, say something. Voicing your concerns can mean the difference in stopping or preventing someone from being exploited or abused. If you think that someone is in immediate danger, dial 999. Otherwise, you should discuss your concerns with the Head of People who will decide a course of action which may include contacting the Police or the Gangmasters and Labour Abuse Authority. Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the Head of People before taking any further action.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

Sleeping Giant Media takes its social responsibility seriously by rejecting all forms of exploitation and human trafficking. The company expects the same standards from all its suppliers and partners.

COMPLIANCE AND REVIEW

This policy is non-contractual, and therefore Sleeping Giant Media has the unilateral right to vary the policy. Failure to comply with this policy may result in disciplinary action up to and including termination of employment.

The Modern Slavery Policy and associated procedures will be reviewed annually to ensure compliance with current laws and regulations. This review will be conducted by the People Team. We will stay informed about changes in relevant legislation and regulations that may impact our policies and make necessary updates promptly to maintain compliance.

Employees will receive training on the importance of the policy to help understand their responsibilities.

The company will conduct regular audits to ensure compliance with this policy.

Date Reviewed: February 2025

Next Review Date: February 2026