



BECKERY ROAD, GLASTONBURY, SOMERSET, BA6 9NX

Modern Day Slavery Policy.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Themes incorporated Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Themes Incorporated Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business.

We are a suppliers and hirers of themed Props Furniture, Dancefloors, Bars, Sound, Lighting, Staging, Trussing, and Video equipment to the Entertainment Industry and private individuals. Our products are used throughout the UK with items being sourced in the UK, Europe and the Far East.

Our high risk areas.

Our UK based suppliers are well established companies in many cases listed companies which must comply with the Modern Slavery Act 2015. We have written to our suppliers asking them to confirm compliance.

Our high risk area will be the supply from the Far East, to help ensure our suppliers are compliant we have asked for written confirmation from the suppliers of compliance, in addition we have visited the factories to ensure they have compliant working conditions.

Suppliers from Europe are a lower risk in our opinion and we have written to them asking them to confirm compliance.

Our policies.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

2.

Identifying victims:

Listed below are examples of the signs of modern day slavery or human trafficking

Is the victim in possession of a passport, identification or travel documents? Are these documents in possession of someone else?

Does the victim act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?

Was the victim recruited for one purpose and forced to engage in some other job? Was their transport paid for by facilitators, whom they must pay back through providing services?

Does the victim receive little or no payment for their work? Is someone else in control of their earnings?

Was the victim forced to perform sexual acts?

Does the victim have freedom of movement?

Has the victim or family been threatened with harm if the victim attempts to escape?

Is the victim under the impression they are bonded by debt, or in a situation of dependence?

Has the victim been harmed or deprived of food, water, sleep, medical care or other life necessities?

Can the victim freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

Our suppliers

Themes Incorporated Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. UK based suppliers pay their employees at least the national minimum wage / national living wage (as appropriate)
4. For international suppliers they pay their employees any prevailing minimum wage applicable within their country of operations

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

3.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees,
- No reports from the public,
- No reports from law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 28th October 2018

Reviewed yearly.

Name: D.R.Churches

Position: Managing Director