



Next Fifteen Communications Group plc  
75 Bermondsey Street, London SE1 3XF

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**NEXT FIFTEEN COMMUNICATIONS GROUP PLC**  
**(‘Next 15’ or the ‘Company’ or the ‘Group’)**

**SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR 2017**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (‘Act’) and the slavery and human trafficking statement for the financial year ended 31 January 2017 for Next 15, inclusive of relevant subsidiaries of Next 15 to which the Act applies.

The Board of directors of the Company has, at a properly convened meeting, viewed and approved this statement, and delegated authority to sign it on their behalf to the Chief Financial Officer of the Group.

**INTRODUCTION**

Next 15 recognises the importance of combating slavery and human trafficking and we do not tolerate modern slavery or human trafficking in our organisation or in our supply chain. This statement sets out the steps that the Company is committed to taking across the Group to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place.

For the purposes of this statement, slavery and human trafficking is based on the definitions set out in the Act.

**OUR BUSINESS**

Next 15, together with its subsidiaries, is a digital communications group comprised of 17 marketing businesses, spanning digital content, marketing, PR, consumer, technology, marketing software, market research, public affairs and policy communications. Headquartered in London, the Group has over 1,600 employees and operations in 14 countries but operates primarily in the US and UK. The Group reported revenue for the year ended 31 January 2017 of £171 million.

**OUR SUPPLY CHAINS**

Given the nature of our business, we do not have an extensive supply chain network. Our supply chains include (but are not limited to): marketing consultants, information technology providers (software and hardware), professional services providers, recruitment agencies, cleaning and catering services, and office maintenance services.

**OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **RISK ASSESSMENT AND MANAGEMENT**

As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chains, we have taken steps to identify, assess and prioritise potential risk areas across our Group and its supply chains, such assessment being based on geography, the product or service supplied and the nature of the business transaction. This assessment will be incorporated into our existing risk assessment process which is undertaken at regular intervals.

We have determined that we are in a low-risk industry and, following our risk assessment, the majority of our suppliers were also identified as being low risk. For any higher-risk areas identified, we have sought to mitigate the risk of modern slavery occurring by performing a more detailed review of potentially high-risk suppliers by:

- gathering further information of the potentially high risk services;
- obtaining relevant contractual terms;
- and holding discussions with the relevant Group company to see the steps taken by them in vetting the supplier, for example whether they have visited the supplier offices or have any other reasons for concern.

We will continue to build upon the risk assessment and mitigation process set out above in FY18.

## **RESPONSIBILITY FOR COMPLIANCE**

The responsibility for all necessary activities to ensure Next 15's compliance with the values and standards set out in this statement will be co-ordinated across the Group's legal, human resources, finance, procurement, company secretarial and internal audit functions.

## **TRAINING AND AWARENESS**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will be:

- providing appropriate training to relevant staff, including thorough induction programmes and as part of ongoing compliance processes; and
- communicating our zero-tolerance approach to modern slavery to suppliers, contractors and business partners at the outset of our business relationship with them, and where appropriate thereafter.

Group employees have access to a confidential whistleblowing process for raising concerns. We continue to increase awareness among employees of issues related to slavery and human trafficking including ensuring the mechanisms available to our workforce are sufficiently known about, trusted and accessible. Our existing process aims to ensure individuals affected would not be victimised further and provide access to counselling and support.



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#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

To assess our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chain, we will develop key performance indicators (KPIs) and will, where possible, measure our performance against them year on year.

#### **FURTHER STEPS**

We will periodically review the effectiveness of the steps we are taking to ensure that there is no slavery or human trafficking in our supply chains. Our aim is to monitor and, where necessary, to improve our policies, procedures and systems.

A handwritten signature in black ink, appearing to read "P. Harris", positioned above a dotted line.

Signed

Peter Harris

Group Chief Financial Officer

Next Fifteen Communications Group plc

17 July 2017