

TEAM LEWIS

PREVENTION OF MODERN SLAVERY STATEMENT

This statement has been published by LEWIS Communications (Holdings) Ltd (“TEAM LEWIS”) pursuant to section 54(1) of the United Kingdom’s Modern Slavery Act 2015 and outlines the actions we are taking to ensure neither Modern Slavery nor Human Trafficking is taking place within our business and supply chains.

1. TEAM LEWIS’ business activities

TEAM LEWIS is the holding company of a group of companies providing global marketing communications services. Further details regarding TEAM LEWIS and its services are available at www.teamlewis.com.

TEAM LEWIS is active in Western Europe, USA and APAC and employs around 700 qualified and skilled people. TEAM LEWIS does not believe it is at risk of modern slavery occurring within its business.

2. Modern Slavery and other policies

In order to enhance TEAM LEWIS’ commitment to combatting Modern Slavery and Human Trafficking, TEAM LEWIS is finalising its draft Modern Slavery policy which incorporates the reasons for the policy, the responsibilities of the different stakeholders involved and specifies a clear reporting mechanism in the event of any suspected wrongdoing. This policy will ultimately form part of TEAM LEWIS Code of Conduct.

In parallel to this, TEAM LEWIS operates a range of separate internal policies to ensure it conducts business in an ethical and transparent manner. These policies are reviewed on an annual basis and updated where necessary. All employees and directors are required to comply with internal company policies, including Anti Bribery and Anti-Corruption policies, as well as our Human Resources policies on recruitment, equal opportunities, bullying and harassment, health and safety and diversity. TEAM LEWIS continues to comply with applicable employment law relating to employee terms and conditions, including pay.

3. TEAM LEWIS’ supply chains and due diligence

Due to the nature of its services, TEAM LEWIS’ supply chain is not extensive and remains more or less the same over the years. Its supply chains include property landlords and associated property services, professional services (including cleaning and catering) and IT services.

TEAM LEWIS maintains a risk based approach with regards to the onboarding of Clients and Suppliers on the basis of the location they operate in and/or the goods and/or services they provide. To the extent warranted, TEAM LEWIS may conduct more in-depth assessments with regards to its Client and Suppliers if -in its reasonable opinion- such parties are deemed to be of high risk. Actions that have been undertaken so far, have included: checking public information on Party’s corporate governance and if not available, reaching out to the Supplier for further information. TEAM LEWIS has also developed a clear KYC checklist which is used when onboarding new Clients. TEAM LEWIS further ensures that any contractual mechanisms are enforced where needed (right to immediately terminate contract in the event of non-compliance with applicable anti-slavery laws).

4. Training

TEAM LEWIS ensures to identify and address the risks in both organisations and supply chain and educates its employees about the risks accordingly. TEAM LEWIS is currently exploring ways in which more recurring formal training sessions can be organized for its employees either in-house or through external providers.

5. Combatting Modern Slavery

No incidents of Modern Slavery have been notified or identified during the period covered by this statement.

6. Further actions

With the TEAM LEWIS Foundation, TEAM LEWIS continues to invest heavily in its employee led charity initiative through which financial and non-financial support is provided to charities with a social cause. Whilst TEAM LEWIS is continuously reviewing and refining its internal policies, it is also keeping a close eye on how national jurisdictions have implemented or are implementing the EU Directive on the protection of whistleblowers which in turn will influence the adoption of a more holistic company-wide policy to this end.

Approval

This statement was considered and approved by the Board of Directors of LEWIS on 22rd June 2022.

Signature		Name
Date	22 June 2022	Chris Lewis