

# **Modern Slavery and Human Trafficking Policy**

Last reviewed June 2025

Cowshed delivers campaigns that work, for clients we love and causes we believe in; we embrace the Modern Slavery Act 2015 and are committed to a world without slavery and human trafficking.

This is our zero-tolerance policy.

## Our structure and organisation

We are a limited company registered in 2014. We are based in Cardiff and employ more than 30 permanent and contracted staff members.

We also work with independent contractors, consultants and others to deliver our organisational and operational needs.

In our own operations, we:

- are a Living Wage employer
- have a clear code of conduct and handbook for our staff and our contractors which include our commitments to Human Rights, Labour, Environment and Anti-Corruption
- are an active member of the UN Global Compact and its ten principles on Human Rights, Labour, Environment and Anti-Corruption
- are working with Diverse Cymru as part of our commitment to diversity and inclusion
- are an Autism Aware business
- have signed up to Zero Racism Wales in support of a zero-tolerance approach to racism in Wales

### Our current policies and controls

We are committed to making sure that there is no modern slavery or human trafficking in any part of our business or our supply chain. We continue to develop our policies and procedures to reflect our commitment to acting sustainably, ethically and with integrity in all our business undertakings.

We want everyone who works for us to feel confident that they can expose wrongdoing without any risk to themselves. The following policies are available to all staff through our staff handbook:

- Code of conduct
- Equal opportunities policy
- Whistleblowing policy
- Bullying and harassment policy
- Diversity and inclusion policy

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and all employees have equal opportunities and are safeguarded from any abuse or coercion.



Our Employee Assistance Programme provides staff with a secure way of seeking advice about any modern slavery or human trafficking issues affecting them or their families.

We require our clients and suppliers to sign our code of conduct and share their policies with us. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

#### Our future commitments

This Modern Slavery statement provides a benchmark for us to review against. We review our progress and statement annually at the end of each financial year.

We will continue to embed our commitments through:

- carrying out an annual risk assessment of our supply chain to identify risks of noncompliance to modern slavery legislation
- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices
- updating our staff handbook, strategies, contract terms and conditions to include our commitment to zero tolerance to modern slavery and human trafficking
- continuing to ensure that consideration of modern slavery risks and prevention is part of our policy review process
- signing up to the Welsh Government's 'Code of Practice for Ethical Employment in Supply Chains'

### Responsibility

Everyone at Cowshed is responsible for creating a non-discriminatory and respectful working environment.

Our directorate and senior management team is responsible for our anti-slavery initiatives, including policies, risk assessments, recruitment, investigation and training.

Vicki Spencer-Francis

CEO & Founder, Cowshed

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