

**SPARK44**

SLAVERY AND HUMAN  
TRAFFICKING STATEMENT  
FOR SPARK44.

FOR THE FINANCIAL YEAR ENDED  
31 MARCH 2020

Date

September 2020

Version

1.0

Spark44’s Slavery and Human Trafficking statement is made pursuant to Section 54 of the Modern Slavery Act 2015 ‘Transparency in Supply Chains’.

This statement sets out the steps Spark44 takes and will take in the future to address the risk of slavery and human trafficking taking place within our own operation and supply chains.

References in the statement to “slavery”, “human trafficking”, “child labour”, “forced labour” etc. mean any conduct which is an offence under Part 1 of the Modern Slavery Act 2015 including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

## **OUR ORGANISATION**

Spark44 is a global joint venture with Jaguar Land Rover. Our primary business is demand creation.

## **ORGANISATIONAL STRUCTURE**

During the year ended 31 March 2020, the average number of staff working for Spark44 was approximately:

	YEAR ENDED 2020			YEAR ENDED 2019		
LOCATION	UK	OVERSEAS	TOTAL	UK	OVERSEAS	TOTAL
EMPLOYEE NUMBERS	422	501	923	525	535	1060

Spark44 has a network of 19 offices globally, providing marketing services to Jaguar Land Rover.



### **RESPONDING TO THE MODERN SL AVERY ACT**

We do not tolerate forced labour either within our business itself or within our supply chain.

Under the sponsorship of the Chief Operating Officer and Global Human Resources Director, Spark44 continues to regularly review existing policies and practices in its response to slavery and human trafficking risks.

We expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values. We have reviewed our business and our supply chain. To date, we have received no reports of concerns regarding slavery or human trafficking or other human rights abuses within our business or any of our supply chains. Neither we, nor, to the best of our knowledge, our supply chain make use of forced labour.

Our current response and management of such risks is as follows:

### **RECRUITMENT PRACTICES**

Spark44 undertakes right to work checks on all employees prior to them commencing their roles in the Company. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work.

## **POLICIES**

All Spark44 employees and contractors are required to sign up to the JLR Code of Conduct and the JLR Human Rights Policy, they confirm that they have read and understood the policies upon joining the business, as well as when any updates are made.

## **CODE OF CONDUCT**

The Code, in place since January 2017 states that:

- We shall respect the human rights and dignity of all our stakeholders
- We do not employ anyone under the age of 15 in or workplace
- We do not use forced labour in any form. We do not confiscate personal documents of personnel or force them to make payment to us or to anyone else in order to secure employment with us or to work with us.

## **HUMAN RIGHTS POLICY**

JLR's new Human Rights Policy was reviewed in June 2020, without any changes being made. It articulates in a single policy pre-existing JLR requirements to the protection of human rights. The Policy applies to all Spark44 staff and contractors.

## **TRADE UNIONS AND OTHER BODIES AND REPRESENTING WORKERS**

Through the Code, Human Rights Policy and employment practices, Spark44 recognises and respects each employee's right to freedom of association, including the right to join trade unions.

## **RISKS OF SLAVERY AND HUMAN TRAFFICKING IN SPARK44' S OWN OPERATIONS**

We deem the risk of slavery or human trafficking occurring within Spark44's employee or contract staff population under our supervision to be low. This is based upon our recruitment processes, the roles being performed, the awareness of policies and the absence to date of reports of concerns regarding slavery and human trafficking.

## **RISKS OF SL AVERY AND HUMAN TRAFFICKING IN SPARK44' S SUPPLY CHAINS**

We expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values as us in respect of modern slavery.

We have taken the following steps to assess and manage any risk that our supply chain may use forced labour:

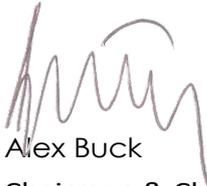
- We expect our suppliers to comply with the Supplier Code of Conduct and to place similar expectations on their respective suppliers.
- When entering into arrangements with suppliers, suppliers undergo a supplier approval process in which we assess them from a qualitative and economic perspective. As part of that assessment, we are alert for any indicators of forced labour.
- We may impose contractual obligations on suppliers under which they:
  - Undertake to comply with our Supplier Code of Conduct;
  - Warrant that their business, and, to the best of their knowledge, their own supply chain does not use forced labour;
  - Agree to provide us on request with responses to self-assessment questionnaire regarding the use of forced labour and steps they have taken to ensure it is not used by them or their supply chain;
  - Agree to permit us and third parties acting for us to inspect their facilities, records and practices, to have access to their personnel and to audit their business for the purposes of ensuring that they comply with these obligations and that there is no use of forced labour;
  - Impose equivalent obligations on their own suppliers.
- When entering into arrangements with suppliers, suppliers undergo a supplier approval process in which we assess them from a qualitative and economic perspective. As part of that assessment, we are alert for any indicators of forced labour.
- Where relevant, we have reviewed statements published by our suppliers on use of forced labour to ensure that they in turn are taking what appears to us to be appropriate steps.

## **ACCESS TO REMEDY FOR VICTIMS**

If Spark44 employees identify any potential signs of slavery, human trafficking or other human rights abuses, they are encouraged to report this to Spark44, to either the Global HR Director, or Chief Financial Officer. Employees can also report any concerns, in confidence, via the independent, externally hosted reporting line.

In the event that such issues were reported to us, we would undertake an urgent investigation into the concerns raised under the supervision of the Executive Team members. If the investigation confirmed the concerns, we would put in place robust action plans to address and manage the risks and protect the victims.

Approved by the Board of Directors on 2020-09-25:



Alex Buck

Chairman & Chief Executive Officer