



Modern Slavery and Human Trafficking Statement

This statement constitutes our company's Modern Slavery and Human Trafficking Statement, setting out the steps we have taken to combat modern slavery within our supply chain and confirming our commitment to taking continued effective action to support the eradication of modern slavery and human trafficking in global supply chains.

The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") by The Commercial Photographers Network Ltd (CPN)

The Act requires businesses such as ours to publish an annual statement setting out the steps that have been taken to prevent modern slavery in the business' operations and supply chains.

Our Business

Our business is a co-operative of commercial photographers founded on the core principles of providing high quality photography and video services.

Our Supply Chains

We acknowledge our responsibilities in respect of modern slavery and human trafficking and are committed to complying with the provisions of the Modern Slavery Act 2015. Our company recognises that this requires an ongoing review of internal practices in relation to our team, as well as our supply chains.

The CPN does not knowingly enter into business with other organisations, in the United Kingdom or abroad, which knowingly support or are found to involve themselves in slavery, servitude, forced or compulsory labour, or abuse of power over vulnerable individuals. We have a zero tolerance stance to modern slavery and human trafficking within our own business, as well as the businesses of our third party partners and suppliers. We are committed to ensuring a working environment where people's fundamental rights and freedom are respected and embraced.

Our supply chains include business partners in the provision of photography and video services; and also providers of other services necessary to run our business effectively, such as IT, payroll, professional services and facilities.



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Our Policies

The CPN is committed to high standards of governance and maintains an internal Modern Slavery policy, as well as other policies which set out our company's broader ethical standards. These policies include:

- Corporate Social Responsibility
- Equal Opportunities
- Code of Conduct
- Anti-Bribery
- Whistleblowing

The CPN's whistleblowing policy and confidential helpline provides a safe channel for employees to communicate any concerns they may have regarding any aspect of their working life or work practices, which extends to modern slavery and human trafficking. Any reports will be referred promptly to Human Resources, be fully investigated with appropriate corrective action taken.

Our team's dignity, fair treatment, health, safety and wellbeing are of the utmost importance and are demonstrated through our core values of treating customers fairly, supporting each other and being open, honest and fair in what we say and do. We ensure that we do not employ people who are underage or who do not have the right to work in the UK. Robust Right to Work checks are completed with all potential new employees, prior to commencement of their employment.

Risk-Assessment and Due Diligence

Due to the nature of our business (which does not include the manufacture or retailing of physical goods) and its core supply chains, we assess that there is a very low risk of modern slavery and human trafficking in our business and supply chains.

When selecting new suppliers or partners, we adopt a risk-based approach in assessing the potential impact on our robust stance against modern slavery, noting that the risk will be higher where suppliers have relevant operations in emerging economies. While the risk is assessed as very low for our business, we are working to embed modern slavery and human trafficking considerations within our due diligence and contracting process, including reviewing published modern slavery statements and requesting further materials or confirmations where appropriate.

Modern Slavery and Human Trafficking training

The CPN is dedicated to ensuring that all employees are educated, understand and take seriously their personal responsibility for the CPN's zero tolerance stance in respect of modern slavery and human trafficking. We plan to enhance our training on modern slavery and are in the process of reviewing options for an e-learning module.

We understand that modern slavery and human trafficking risks will not remain static and will continue to complete a regular review with a view to mitigating any new risks that may be identified.



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Key Performance Indicators

In order for the CPN to assess the effectiveness of measures taken, we will assess the following key performance indicators:

- Completion of online employee training, once implemented
- Ensuring that any concerns about modern slavery or human trafficking can continue to be raised through a confidential whistleblowing helpline
- Logging and internally reporting on any modern slavery and human trafficking breaches, investigations undertaken and remedial actions taken
- Periodic review of the relevant policies and procedures that we have in place

Further Steps

Moving forward, we will conclude our assessment of online training options and make appropriate updates to the CPN's training materials with a view to ensuring our team understand the risks of modern slavery and appreciate their role in combatting it.

We will also seek to further embed consideration of the Act within our supplier tender and contractual process, requesting further due diligence materials or confirmations where the risk is assessed to be higher.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the CPN's modern slavery and human trafficking statement.

Richard Campbell

Chairman

1st March 2023