

Modern Slavery and Human Trafficking Statement

Introduction

This statement is Marketing VF Limited's ("MVF" / "we" / "our") fifth statement in accordance with the Modern Slavery Act (MSA) 2015. It reflects our improvement actions taken in 2020; to understand the material risks related to our business and to put in place steps that are aimed at minimising the risk of slavery or human trafficking in its own business and its supply chains.

MVF recognises that it has a responsibility to take a robust approach to slavery and human trafficking. MVF is committed to corporate social responsibility, and to understanding and safeguarding its business and supply chain from modern slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of MVF:

- MVF is an award-winning company that provides a scalable source of new customers to businesses all over the world. MVF's technology and world-class cross-channel marketing teams help connect active customers with businesses looking to scale. We procure different services and products from a number of suppliers. We have around 600 employees, with the majority based in the United Kingdom, United States and the Netherlands.
- The vast majority of our procurement spend is on services in the following areas: Online marketing/advertising, IT/cloud-based solutions, and office premises and facilities. Many of the service providers we work with are large multinational businesses (e.g. Google, Facebook).
- Most of the products we purchase are IT equipment (e.g. laptops, telephones). Again, in the main, we purchase such items from large multinational businesses (e.g. Dell).

Countries of operation:

- MVF's main activities are UK based, with satellite offices in Austin, US and Netherlands.

MVF has adopted a risk-based approach when assessing suppliers enabling us to select categories of suppliers based on key risk factors such as forced labour, data protection and customer privacy issues.

In our assessment we consider:

- The geographical location
- The human rights and worker rights within the location
- The nature of the services provided
- The quality of the services / products
- External checks on high risk countries and suppliers

High risk activities:

Given the nature of our business, our limited supply chain (including the geographical location of the supply chain) and our internal processes (outlined below); we believe that the risk of modern slavery or human trafficking in our business or supply chain is low.

Relevant policies

MVF has in place the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Anti-Modern Slavery policy
- Whistleblowing policy
- Business conduct principles and guidance
- Employee code of conduct - this is part of our Employment Contract
- Supplier code of conduct
- Environmental, social and governance policy
- Grievance policy

Our approach to recruitment reflect our zero tolerance to modern slavery, with the expectation that our recruitment partners will reflect this commitment.

Due diligence

MVF takes a zero tolerance approach to modern slavery and human trafficking and expects our suppliers to do the same. We expect all suppliers to meet the disclosure requirements under the MSA and to undertake the necessary due diligence to ensure that there is no modern slavery or human trafficking in their operations and supply chains.

MVF undertakes due diligence when considering taking on new suppliers, and reviews its existing suppliers periodically. During the year we have updated our supplier due diligence to include questions asking our suppliers about their own operations and compliance with the Modern Slavery Act 2015.

Training

MVF aims to provide a workplace that is inclusive, rewarding and creates opportunities for all of our people.

In order to ensure our employees understand and comply with the policies that govern working at MVF, all employees complete a mandatory module called “do the right thing” during their Induction which includes MVF’s Business Conduct Principles.

Employees who become aware of or suspect any conduct that they believe violates any applicable law, rule, regulation, company policy or any of our Business Conduct Principles, are required to report improper conduct as quickly as possible.

We undertake tailored Anti-Modern Slavery training with specific employees (for example, Finance, Office Management, Recruitment, Legal, etc.) engaged in managing our supply chain to ensure that they are equipped with the necessary knowledge and awareness to correctly assess the risk within our supply base. We use an external elearning provider and training will be refreshed on an annual basis.

Board approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by MVF’s Board of Directors, and constitutes MVF’s modern slavery and human trafficking statement for the financial year ending April 2021.

Michael Teixeira
CEO
Marketing VF Limited
Date: 1st December 2021

