OpenAgency

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Modern Slavery and Human Trafficking Policy

Policy owner: James Breeds, Business Director
Approved by: Lewis Macleod, Managing Director
Effective date: January 2026
Next review: January 2027

Our commitment

Open Agency does not tolerate slavery, servitude, forced or compulsory labour, or human trafficking in its business or supply chain.

We are committed to treating people fairly and working with suppliers and associates who respect human rights. We will take proportionate steps to identify risks, raise concerns and act where unacceptable practices are identified.

Our business and supply chain

Open Agency is an independent brand and creative agency based in London. We provide brand strategy, design, campaigns, digital services and communications for clients across several sectors.

Our supply chain includes freelance specialists, creative and production partners, printers, technology providers and suppliers of goods used in our work.

Although much of our work involves professional services, we recognise that risks may also arise through subcontracting, print production, merchandise, equipment and the sourcing of materials.

Who this policy covers

This policy applies to Open's directors and employees. We also expect freelancers, contractors and suppliers working on our behalf to observe its principles.

James Breeds is responsible for overseeing the policy. Anyone selecting or managing suppliers is responsible for considering relevant risks and raising concerns.

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Selecting and working with suppliers

We will make checks proportionate to the nature, location and value of the work and the risks involved. These may include:

- Establishing the supplier's identity, location and relevant experience.
- Asking who will undertake the work and whether it will be subcontracted.
- Reviewing relevant policies or statements where available.
- Asking about the origin of goods and materials where sourcing presents a potential risk.
- Seeking further information where pricing, working arrangements or other circumstances raise concerns.

Where appropriate, we will communicate our expectations through supplier briefs, purchase orders or agreements. We will make clear that forced labour, trafficking and exploitative practices are unacceptable.

We will not knowingly engage a supplier involved in modern slavery.

Employment and working practices

We will use clear employment and engagement terms, meet applicable pay requirements and ensure that people are free to leave their employment or engagement in accordance with those terms and the law.

We will not retain workers' identity documents or require payments or deposits as a condition of working for Open.

We expect suppliers to apply equivalent standards to the people undertaking work on our behalf.

Raising a concern

Anyone who suspects modern slavery or exploitation connected with Open's work should report the concern promptly. Proof is not required before raising a concern honestly.

Reports can be made verbally or in writing to:

Primary contact: James Breeds, Business Director
Email: james@openagency.com

Alternative contact: Lewis Macleod, Managing Director
Email: lewis@openagency.com

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The alternative contact can be used where a concern involves James or another reporting route is preferred.

No one will be disadvantaged for raising a concern honestly, even if it is not subsequently substantiated.

Responding to concerns

We will take reports seriously, handle information sensitively and assess the appropriate response. The safety of anyone who may be affected will be a priority.

Depending on the circumstances, we may seek specialist advice, request further supplier information, suspend work or refer concerns to the appropriate authorities. We will avoid actions that could place a potentially affected person at greater risk.

Where a supplier fails to address a substantiated concern, we will consider ending the relationship, taking account of the consequences for affected workers. We will keep an appropriate record of the concern, decisions and action taken.

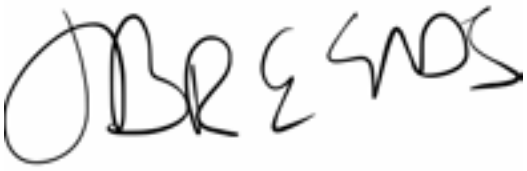
Awareness and review

We will share this policy with staff and make relevant expectations clear to those commissioning or managing external work. Where additional knowledge is needed, we will arrange appropriate guidance or training.

We will review the policy annually and following any significant concern or change in our business or supply chain. The review will consider supplier checks, concerns raised, actions taken and improvements needed.

The policy owner will record the review and agreed actions.

Approval and signature
This policy has been approved by the Board of Directors of Open Agency



James Breeds
Business Director
01 Jan 2026

Publication
This statement is published on our website.