



Modern Slavery Statement

Year Ended 31st December 2023

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and has been ratified by the Boards of VCCP Group LLP, and its parent companies, Chime Group Limited and Chime Group Holdings Limited.

Companies in the Group that are required to issue this statement for the financial year ended 31 December 2023 are Chime Group Holdings Limited, Chime Group Limited and VCCP Group LLP (together “we”, “our”). This is the largest single entity within our Group (VCCP Group LLP), the largest holding company (Chime Group Limited) and the largest group for which group financial statements are prepared (Chime Group Holdings Limited). The Group is wholly owned by Providence Equity Partners through its investment funds, Providence Equity Partners VII L.P., and Providence Equity Partners VII-A L.P. Providence Equity Partners is a global alternative investment firm established in 1989, focused on education, media, communications and information investments. The firm’s private equity platform specialises in sector-focused buyout transactions and growth capital investments. Providence Equity Partners made its investment in the Group through PM VII S.a.r.l., a company registered in Luxembourg.

The Group acts responsibly, and we conduct our business with honesty, in good faith, and in compliance with the law. We set ourselves high standards in our business practices and expect businesses we work with to meet the same level of business ethics. We do not tolerate any form of modern slavery or human trafficking in any part of our business and are committed to carrying on our business in a manner which respects the rights of individuals in the communities in which we operate. We have taken, and are continuing to take, steps to ensure that our businesses identify risk areas in their supply chains and to implement policies and procedures to eliminate those risks.

The Board of Directors of Chime Group Holdings Limited “the Board”, assisted by the Audit Committee, are responsible for the overall strategic direction of the Group including ensuring that systems for the identification and management of risk, including the risk of slavery and human trafficking in our business and supply chain, are robust and appropriate. Our internal audit and risk and compliance teams verify compliance with our operational standards and report directly to the Board.

ABOUT US

Following the sale in the third quarter of 2023 of CSM, the Entertainment and Sports Marketing agency, Chime is now entirely focused on VCCP which is a

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leading, global, integrated advertising and marketing services group. Its services span Communications (advertising, direct marketing, digital communication, PR, social), Experience (design, build and management of digital and physical brand experience) and Distribution (media planning, buying and implementation across owned, earned and paid channels), with brand strategy and data at the centre. VCCP Business is the B2B offering of the Group, with specialist and deep expertise in technology, financial services and health.

OUR APPROACH

VCCP Group operates in many markets and countries throughout the world, in all instances committing through creativity, relationships and work to use communications to create social cohesion, encourage kind and responsible actions for ourselves and our planet and share our skills to deliver social good.

It is the policy of the VCCP Group:

- To procure goods and services from reputable suppliers who have established processes which reflect our Responsible Business Code and are consistent with this policy.
- To establish and maintain processes to ensure our supplier are selected on the basis of their adherence to this policy.
- To establish and maintain processes to monitor the compliance of our existing supply chain to this policy.
- To drive continuous improvement both in our own procurement practices and to encourage the development of practices by our suppliers and wider value chain partners consistent with the Responsible Business Code and this Responsible Sourcing Policy.

Our Responsible Business Code, Know Your Clients and Suppliers Policy, Staff Code of Conduct and other policies aim to support and uphold the United Nations' Guiding Principles on Business and Human Rights.

Our Know Your Clients and Suppliers Policy reflects our commitment to acting ethically and with integrity in our business relationships. It sets out appropriate steps we require each of our agencies to take to ensure we understand who we do business with, and to ensure that there are no reputational or ethical issues working with a supplier.

Our Responsible Sourcing Policy sets out the high-level principles we have adopted to ensure goods and services are procured in a responsible manner consistent with our own stated business ethics and those set out in widely recognised international standards.



The Group has revised and adopted an Ethics Policy which set out - at a high level - those business activities, geographies, and industries where we will not engage with clients using a RAG system to ensure we systematically identify and manage risks as they arise. A reporting and monitoring process aims to identify risks before formal engagement.

ASSESSMENT

The VCCP Group comprises a number of different agencies working from locations around the world. The business has considered the risk of modern slavery within the workplace and considers that the business sector, high skilled nature of the services the business provides, together with extensive people policies and management oversight and support, mean that the risk of modern slavery and labour rights infringement in the workplace is low. Detailed below are some of the people policies and initiatives that support our business operations and workforce.

Reflecting the multiple locations across the world, and the variety of services the division provides, the division has a varied supply chain. The supply chain falls into two broad categories: those supplies used directly in the provision of the division's services to clients; and the supplies procured by agencies to support the running of the business. In the former category, media and production spend are the main components. The latter category includes property services, office supplies, IT infrastructure and support, people support services, and travel and accommodation. Details of the steps the VCCP Group has taken to minimise the risk of slavery, human rights abuses and to understand the group's supply chain are described below.

PROCESS

Employees

We recognise our people are what makes us successful. As the Challenger Agency for Challenger Brands, we challenge our employees to be their best while working, and to enjoy themselves while doing it. Creating and sustaining the environment in which our employees are able to do that is essential and identified below are some of the core focus areas.

DE&I: Diversity, Equity and Inclusion, or Different, Exciting and Interesting is the VCCP Group's strategy spearheaded by the group's DE&I Collective who keep us accountable to our goals. Over the course of 2023, the DE&I Collective carefully considered where and how to evolve our DE&I goals, work and influence to ensure it is fit for purpose for now and (as far as possible), the future.

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Our DE&I Collective created a newly formalised set of objectives in 2023 to:

- address the fundamentals - from assessments and training to recruitment and supplier policy, to creating a DE&I Commitment that all VCCP Group employees should live by.
- focus on belonging for all - celebrate underrepresented communities and cultures. Promote allyship and intersectionality.
- shape the output - provide guidance and consultant on every type of output from across VCCP Group.

Cultural education and training are at the heart of the group's DE&I strategy. Over the last year, training and initiatives were designed to support specific departments on their DE&I journey, increasing engagement and creating better, more inclusive work. For example, the group rolled out our new Inclusive Language Training in our creative and planning departments. We also made Inclusive Recruitment training and Inclusive Leadership training mandatory for all hiring managers.

Accessibility: As a digital industry, it is our duty to ensure that people of all abilities and backgrounds can use the digital experiences that we create. In 2023, the VCCP Group established its Accessibility Collective - a cross-discipline and cross-border team that advocates, upskills and delivers accessibility for all our clients. The Collective hosts five objectives:

- Culture: Build a culture for accessibility and inclusive design.
- Training: Upskill everyone to deliver accessibility as part of best practice.
- VCCP Group: Ensure VCCP Group & Bernadette web platforms are accessible.
- Clients: Provide our existing clients with a web accessibility offering across UX, UI, Copy, Content, Management and Development.
- New Business: To have digital accessibility as a mandatory inclusion in new business pitches

Since its launch, we have baked accessibility standards into our own and our client's web platforms.

Gender: In 2023 the following activities were undertaken to reduce the gender pay gap and gender split in our agencies:

- The launch of a set of family and care policies, such as a menopause policy & fertility treatment support.
- The provision of a maternity coach for all parents returning from parental leave, support which commences before going off on leave and which is available right through to return and beyond.



- The launch at an entry level training programme called ‘Bear Essentials’ designed to provide comprehensive training, mentorship and foster a sense of community among all our entry level talent.
- The continuation of the VCCP Group’s Future Leaders programme with a second cohort of which 77% were female and who all graduated successfully from the programme.
- The provision of unconscious bias training for managers, and inclusive recruitment training for all hiring managers.

Health & Wellbeing: VCCP Group’s Thrive platform provides a central location for access to all of VCCP’s personal and career development resources. A major focus for the platform is the provision of resources enabling staff to determine the choice and pace at which they undertake training or access resources to designed to assist across a wide range of subjects. Resources cover areas such as mental and physical health, personal finance, career development, and access to the Group’s comprehensive benefits package. The people and talent team at VCCP host a wide range of activities including online Thrive Presents sessions, in-person seminars and workshops on industry relevant topics and a diverse social and events programme. Through the Thrive Platform the team provide links to a wide range of internal and external support and development resources from links to NABS (the National Advertising Benevolent Society) to VCCP’s own internal mental health first aiders. Whilst regional variations exist, the group aims to ensure that equivalent resources are extended to all staff wherever they are based.

Suppliers

The Group uses an onboarding process whereby all new suppliers are required to complete an onboarding questionnaire which includes a requirement to confirm that suppliers:

- pay the “living wage” or local equivalent;
- employees have the right to work;
- have measures in place to ensure no discrimination as a result of protected characteristics;
- employees’/workers’ and their contractors comply with international human rights and labour standards;
- monitor and mitigate the risk of modern slavery; and
- address Bribery and Corruption risks.

The supplier onboarding process has been expanded in the major part of the Group to obtain relevant information from suppliers about working practices and key ESG matters, and this will gradually be expanded to all agencies.



In addition to the above, the Group has in place a compliance process used for all significant or higher risk supplier onboarding. This provides a baseline of information about a supplier to enable agencies to identify any known risks. The process uses a market-leading tool to undertake these due diligence checks, and a process is in place to highlight high risks to management for a decision to be made on whether to accept a supplier.

The Group has risk assessed its supply chain to identify areas of significant spend, geographic spread in the supply chain's Tier 1, and areas considered high risk. Using this information, the Group engages directly with key Tier 1 suppliers to understand and align business processes. This engagement seeks to ensure that at a minimum, suppliers comply with the Group's Responsible Sourcing Policy. Where suppliers are identified as being at a higher risk of modern slavery through the products or services they supply, the business will engage more directly to understand procurement practices and upstream supply chain.

WHAT'S NEXT?

In 2024, the VCCP Group will be implementing a new Enterprise Resource Planning (ERP) system which will enable better control and understanding of the Group's Tier 1 supply chain. Ensuring good quality and consistent information on all suppliers is key to the management of modern slavery and human rights risks and remains a priority. Beyond this, the group continues to work with selected suppliers to understand risks in their value chain and to assist them in understanding their own risks and to improve disclosures.

The VCCP Group will be committing to the United Nations Global Compact, a voluntary undertaking which helps businesses to adopt sustainable and socially responsible business policies within a framework founded upon 10 principles. Whilst the group is confident that its approach is aligned with the principles, this commitment will help the business in building its governance functions around a recognised framework and will help drive transparency.

Joanne Parker
Chief Operating Officer
June 2024