

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to all companies within and associated to **Premier Model Management Limited** (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year 1st April 2021.

B) ORGANISATIONAL STRUCTURE

The Group structure comprises of one centralised office (as Premier Model Management Limited – **C1**), one active operating company (as Premier Mission Group Limited – **C2**), one inactive dormant company (as Premier Model Agency Limited – **C3**) and one inactive facilitation company (as Premier Casting Incorporated – **C4**). Below is a brief description of how the companies operate:

1. **C1**; Centralised office where all employees work, of address 40 Parker Street, Covent Garden, WC2B 5PQ
2. **C2**; Operating company with approximately 5 employees, of address Parker Street, Covent Garden, WC2B 5PQ
3. **C3**; Dormant company – non operational
4. **C4**; Active, non-operating company raised to facilitate international payments for work carried out on behalf of **C1** in the United States of America

The Group's main business engagement is to act as an Agent on behalf of established fashion models to find them work in the industry, as well as up-and-coming new faces and a development division for models we believe in from a younger age group. Models are booked with clients on jobs all around the world and the Group takes a commission percentage of any work billed for. There is a seasonal "Fashion Week" that, for women, runs from mid-September (17th-23rd September in 2019) and, for men, runs The internal structure of the centralised office (**C1**) is as follows:

1. Women's Division (Mainboard, Premier, New-Faces, Image)
2. Men's Division (Mainboard, New Faces, Image)
3. Artists Division (Artists, Digital, Creative)
4. Imaging Department (Content Creation, Social Media)
5. Finance Department (Book-keeping, Credit-Control)

Senior Management across the Group organisation is controlled by a Board of Directors who have a shareholding stake in each company, which then filters down to the heads of each ancillary Department including Operations and Finance.

The Group mainly operates within the United Kingdom, with its' office headquarters based in Covent Garden, London. Occasionally, we may send our scouts out to different regions within the UK to attend Festivals and other events to find new talent for the Agency. Staff are sometimes required to travel internationally for Scouting, PR or client relationship purposes in the following countries:

1. America
2. France
3. Italy
4. Spain
5. Latvia
6. Russia
7. Lithuania
8. Poland
9. Morocco
10. Brazil
11. China
12. Holland

C) DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the Group.

E) SUPPLY CHAINS

In order to fulfil its activities, the Group's main supply chains include those related to legal services, cleaning, office maintenance and equipment servicing. As all of our supply chains are based within the UK, the risk to modern slavery is lower as the activity is prohibited and criminalised by law in this jurisdiction. As we supply a service to our clients and make a commission-based profit, our supply chain is relatively small which allows us to make necessary checks on the companies we deal with quickly and efficiently by ensuring they display their own Modern Slavery statement publicly on their website and request them to detail what they are doing to ensure they are not themselves dealing with related issues within their supply chains.

F) POTENTIAL EXPOSURE

The Group considers its main exposure to the risk of slavery and human trafficking to exist where our models are sent abroad to do work in the countries listed in paragraph "B". As some of the countries listed do not have the same laws and governance as we have here in the UK, this exposes the model a slightly greater level of risk. As this is potentially our greatest exposure to modern slavery, we carry out due diligence to all of the clients we send our models out to and carry out background/criminal history checks on our own staff.

In general, the Group considers its exposure to slavery/human trafficking to be relatively limited. It has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Group as it did for others across the nation.

The Group welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Unfortunately, the Group assessed that it would need to delay the publication of this statement for the 2019/2020 financial year due to the impact of COVID-19. It has therefore been delayed for 13 months. The reason for the delay was that a most staff were furloughed and management time was limited to working on pressing operational and financial matters stressed throughout the Pandemic.

The Group concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. This is because restrictions introduced by nations across the globe led to a substantial decrease in international travel, resulting in a large decrease in demand for The Group's services. Accordingly, its use of suppliers dropped significantly because homeworking was swiftly implemented in March 2020 which meant that its premises, from which it usually conducts day to day business, were temporarily closed. Several of our workforce were placed on furlough as a result of the drop in demand for our services, meaning there were no additional temporary labour needs.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, Group employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Group's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

H) STEPS

The Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

- Continually review supplier contracts and formally explain how we expect suppliers to operate to avoid labour exploitation and include clauses outlining the Groups zero tolerance policy towards modern slavery.
- Provide training for members of staff to help spot the signs of modern slavery and encourage them to watch for signs of exploitation in anyone they interact with as part of their work.
- Conduct a human rights impact assessment to identify high-risk areas where modern slavery could exist and provide a framework to tackle these areas.
- Educate models so that they can identify cases where they may be a victim of modern slavery and provide support to safeguard models.
- Ensure that everything is done within our power to comply within minimum wage payment standards for all employees.

I) KEY PERFORMANCE INDICATORS

The Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Group or its supply chains.

- Monitor the number of staff accessing the presentation aimed at educating about modern slavery
- Annually audit suppliers through use of a questionnaire to assess their effectiveness at combatting modern slavery.
- Conduct a survey among staff and models to assess their experiences of modern slavery in the workplace.

J) POLICIES

The Group has the following policies which further define its stance on modern slavery:

1. Child Labour Policy
2. Supplier Code of Conduct

K) TRAINING

The Group provides the following training to staff to effectively implement its stance on modern slavery:


- An accessible presentation outlining Modern Slavery Act 2015, along with the definitions of modern slavery and how it could manifest in our industry.
- Training to provide steps that employees can take to identify modern slavery, and how they can help victims they identify.

L) SLAVERY COMPLIANCE OFFICER

The Group has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval... 30/04/21

Signed... 

JACK BEST
Head of Operations

Date... 30/04/21