

Modern Slavery Statement 2019/20

Creativity International has a zero-tolerance policy on modern slavery. This statement, published in accordance with the Modern Slavery Act 2015, outlines the risks that could potentially be involved in our operations and supply chain, and what preventative actions we are taking to eliminate modern slavery and human trafficking.

Our Organisation

Beginning as an educational display product supplier over 20 years ago, Creativity International is now part of the F.I.L.A group; one of the leading world groups dedicated to creative expression. We pride ourselves on being able to cater for all manner of creative outlets for adults and children alike through our wide range of retail and educational products.

We have around 50 staff employed in the UK, which is generally not seen to be vulnerable to modern slavery, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers. We are committed to providing customers with goods that have been produced in fair and safe working conditions, without any kind of exploitation, and act ethically and with integrity in all of our business relationships.

Our Supply Chain and Due Diligence

We maintain long standing relationships with the majority of our supply base, predominantly based in the Far East and US. Our teams have personally met with many of our suppliers, and any proposed new supplier must provide evidence of recent audits (typically Smeta – Sedex Members Ethical Trading Audit covering Labour, Health and Safety, Environment and Business Ethics). This allows us visibility of the factories being used, working conditions, and a 'corrective action plan' for any issues of non-compliance. It is the responsibility of our suppliers to inform their sub-contractors and agents of our policies, and to ensure compliance throughout the lower tiers of the supply chain.

Responsible sourcing - We aim to ensure procurement decisions minimise any negative impact on human rights and the environment whilst endeavouring to maximise value and service levels. We encourage all suppliers to obtain evidence that they source their products ethically (e.g. FSC certification for wood/paper suppliers). If suppliers fail to meet audit standards, or do not source ethically, we will not partake in business with them.

We also conduct risk assessments to identify areas of the business that may be regarded as high risk of exposure to slavery and such areas will be subject to additional safeguards, reporting procedures for both employees and suppliers which encourage reporting of any incidents of potential, suspected, attempted or actual slavery involving Creativity International.

Policies

Anti-Bribery and Corruption policy – Outlines what bribery and corruption is, how the company would deal with such things and what the legal implications are, and how to raise any concerns.

Grievance Policy – Provides clear guidelines on how individuals can raise concerns, along with what will happen at that point, and the potential outcomes of any investigation.

Equal Opportunities Policy – Outlines our active commitment to providing equal opportunities and embracing diversity. This policy also clearly explains what individuals can do in the event they do not feel they are being treated fairly or equally.

Right to Work – Creativity International does not discriminate when employing, but will not employ anyone who cannot demonstrate their legal right to work in the UK. Checks are carried out on all team members at the point of employment, in line with UK employment legislation. We do not employ anyone under the age of 16, we adhere to the minimum wage, and all staff members receive a contract of employment advising their statutory rights and entitlements.

Ethical Trading Policy – Outlines our commitment, practices and accountability.

Anti-Slavery Policy – Zero tolerance to slavery; any breach by employee will be disciplined, all suppliers are expected to comply and failure to do so will result in termination of any business relationship

Training and Communication

We continue to work towards providing advice and guidance to those teams who have direct responsibility for relevant supply chains and our Procurement team has participated in training such as CIPS, to include modern slavery training. Our policy is communicated to all suppliers, and employees of Creativity International.

This statement has been approved by the Managing Director of Creativity International



Robert Ireland
Managing Director
Creativity International