

# Modern Slavery Act 2015 statement

## Statement | November 2020

#### **Background:**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Under section 54 of the Modern Slavery Act, commercial organisations that supply goods or services, carry on business in the UK and meet the annual turnover threshold of at least £36m from the provision of goods and services must publish an annual slavery and human trafficking statement for financial years ending on or after 31 March 2017.

While our turnover is less that the minimum threshold, we strongly stand against any practices of modern slavery and therefore outline the below the key steps that we have taken in this area.

### Overview of Plum's consulting services:

#### **Spectrum** Legal and transaction services management Spectrum release and • Commercial, operational, auction design technical due diligence • ITU-R and CEPT Legal support Strategy and Expert witness engagement Allocation policy Transactions support **Telecommunications** commercial solutions Strategy development • Financial modelling Regulatory policy Competition analysis • Investment appraisal Network Performance Digital platforms improvement infrastructure Competition and Telecommunications and broadcasting networks regulatory policy Market definition Satellite systems and capacity analysis Net neutrality Technical planning and Platform neutrality Radio engineering **Broadcasting** OS and apps simulation Propagation Interference analysis Coverage planning Experimental studies Technology evaluation

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Plum was founded in London as a limited company in 2007 by four experts in economic regulation. Since then it has become a partnership (in 2012), and merged with Aegis Systems, an engineering consultancy. After thirteen years the business continues to grow and has recently opened an office in Paris to expand to francophone regions.

Our work is based on rigorous economic analysis and technology and engineering capability, which we combine with extensive market knowledge and commercial experience in the communications sectors to provide clear and sound analysis for our clients. We also bring extensive 'hands-on' capability with programme management, operational work, procurement, performance improvement, and delivery of complex technology and commercial programmes.

We offer consulting services for our clients across multiple areas, including business and technology strategy development, competition analysis, regulatory policy assessment and development, mobile and fixed line strategy, strategy and commercial solutions, and specialist technical areas. Our worldwide experience means that we are able to bring best practice to every project.

Plum operates globally and at the heart of policy, regulation, and private strategy and programmes, and support clients around the world including regulators, governments, vendors, operators, investors and banks and law firms. Key differentiators in our approach include use of senior and proven consultants – bringing extensive experience in delivering projects.

We consider that given the nature of the services that we offer that the risk of involvement in modern slavery and human trafficking is low.

Also, we would like to note that we work in a serviced office and the staff who work there fall under that company's policies.

Steps we have taken to ensure that modern slavery is not taking place in our organisation or supply chains include the following:

- Have a robust recruitment and onboarding process with multiple checks built in to ensure all individuals employed by us have the right to work in the UK, are paid a fair salary in compliance with all relevant rules and regulations and are not subjected to human trafficking or forced labour.
- Have a policy for equal opportunity and are committed to eliminating discrimination and encouraging diversity amongst our workforce. Our aim is that each employee feels respected and is valued based upon their skills, performance, and commitment.
- Have a policy for fair treatment that ensures that all employees whether full-time, part-time or temporary, will be treated fairly and with respect.
- Our business activities are conducted in the highest ethical and professional manner. All employees are
  expected to comply with Plum's code of conduct and seek to avoid even the appearance of improper
  behaviour.
- Our employees have a personal responsibility to immediately report to the company any illegal or unethical behaviour. We have an anonymous feedback process in place which allows them to do so.
- We choose our suppliers not only on the basis of the quality and price of their products and services but keeping in mind their policy in relation to human rights, inclusion & diversity, environmental sustainability and ethics.

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