



Purple Frog Signs Ltd – Modern Slavery & Human Trafficking Policy

Adopted by the Board on 1 August 2025 | Next review due 31 July 2026

1. Purpose

This policy sets out how Purple Frog Signs Ltd (“PFS”, “we”, “our”, “the Company”) prevents, identifies and addresses modern slavery and human trafficking in its own operations and throughout its supply chains, in line with Section 54 of the Modern Slavery Act 2015 and the refreshed Home Office statutory guidance issued on 24 March 2025 (updated 30 July 2025).

Although PFS’s annual turnover currently falls below the Act’s £36 million reporting threshold, the Board has chosen to publish this voluntary policy and an accompanying annual Transparency Statement to demonstrate leadership and meet evolving stakeholder expectations.

2. Our Business & Supply Chains

PFS designs, manufactures, installs and maintains bespoke signage and graphical displays for commercial customers across the UK.

Direct operations – design studio, fabrication workshop, vinyl printing, LED assembly and nationwide installation teams.

Primary supply chain – aluminium and steel sheet, acrylics, vinyl films, LEDs, electronic drivers and timber.

Secondary supply chain – cleaning, catering, ICT, logistics and labour agencies.

Our raw materials are sourced mainly from UK and EU distributors.

3. Commitment

The Company has zero tolerance for any form of slavery, servitude, forced or compulsory labour and human trafficking. We expect the same high standards from all of our contractors, suppliers and business partners, and we will only work with those who share our values and are willing to comply with this policy.

4. Governance & Responsibilities

Board of Directors

Approves policy and annual Transparency Statement; reviews performance

Managing Director (MD)

Overall accountability for implementation; signs the annual statement

Modern Slavery Compliance Officer (MSCO)

Day-to-day oversight, risk assessments, supplier engagement, training, incident response.

Department Heads

Ensure their teams follow the policy, complete due-diligence steps, and escalate concerns.

All Employees & Contractors

Follow the Code of Conduct, complete training, and report any suspicions in good faith.



5. Policies & Controls

Code of Conduct – prohibits modern slavery, child labour and inhumane treatment; applies to staff and agency workers.

Supplier Code of Labour Standards – contractual clauses require suppliers to:

Ban forced, bonded or trafficked labour and child labour;

Allow freedom of movement and association;

Pay at least national minimum wages;

Maintain safe working conditions;

Cascade these standards to their own suppliers.

Recruitment & Agency Worker Procedure – prohibits fees, document retention, or tied accommodation without choice.

Whistleblowing Policy – confidential Speak-Up line, open to workers in our supply chain, investigated by MSCO.

Corrective-Action Framework – remediation plans, time-bound milestones, and the right to terminate relationships for severe or persistent breach.

6. Due-Diligence & Risk Management

Stage	Key Actions
Mapping	Maintain an annually updated map of tier-1 & (where feasible) tier-2 suppliers, categorising by country, sector and spend.
Screening	Desktop risk-screening using industry indices (e.g., Global Slavery Index, Maplecroft) plus self-assessment questionnaires (SAQs).
On-site Verification	Targeted audits (own staff or third-party) for medium/high-risk suppliers; unannounced spot checks if credible concerns arise.
Contracts	Embed the Supplier Code; require evidence of workers' age verification, wage slips and working-hours records.
Continuous Monitoring	Annual renewal of SAQs and KPIs; grievance channels promoted on-site in relevant languages.

7. Training & Awareness

Induction – compulsory e-learning on modern slavery signs, reporting routes and safe recruitment

Role-specific – MSCO trains buyers, HR and site supervisors on in-depth red-flag indicators

Supplier Workshops – annual webinar sharing best practice and updates to statutory guidance.



8. Performance Indicators (FY 2025/26)

KPI	Target
% Tier-1 suppliers that have signed Supplier Code	100 %
% Spend under SAQ risk-assessment	≥ 95 %
# Modern-slavery concerns raised & closed	Tracked; zero unresolved
Audit corrective-action completion within deadline	≥ 90 %

Progress against these KPIs will be disclosed in our annual Transparency Statement and reviewed by the Board.

9. Reporting & Escalation

Any employee, contractor or third party can raise concerns via:

Speak-Up Line (freephone & email, anonymous option);

Direct to MSCO or any Director;

External – Modern Slavery Helpline 0800 0121 700 or law-enforcement.

Retaliation against whistle-blowers is strictly prohibited.

10. Breach Management

Where suppliers are found non-compliant:

Immediate risk mitigation to protect affected workers;

Corrective-action plan with clear milestones;

Follow-up audit within 3–6 months;

Suspension or termination where remediation fails or abuses are severe.

11. Continuous Improvement

We will benchmark our programme against the 2025 statutory guidance's "Level 1–Level 2" disclosure model and work towards deeper, data-driven reporting year-on-year.

12. Approval

Signed for and on behalf of the Board of Purple Frog Signs Ltd:

Chris Wakelin
Managing Director
1 August 2025

This document is provided for general information only and does not constitute legal advice. PFS will review and update the policy annually or sooner if legislation or guidance changes.