

Modern Slavery and Human Trafficking Statement

Issued: August 2026. Next review: August 2027.

Introduction

Spirit Media Scotland Limited (company number SC226495) is a fully remote media planning and buying agency working with clients across Scotland and the UK. Our annual turnover is below the £36 million threshold at which section 54 of the Modern Slavery Act 2015 requires a slavery and human trafficking statement; we make this statement voluntarily because we believe the commitment matters regardless of size, and because our clients and public sector partners are entitled to know where we stand.

We have zero tolerance of modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships, and we will not knowingly engage with any person or organisation involved in slavery, servitude, forced labour or human trafficking in any form.

Our business and supply chain

We employ twelve people directly, all based in the UK and all paid at least the real Living Wage as an accredited Living Wage Employer - direct employment on fair terms is itself our strongest safeguard against labour exploitation. Our supply chain reflects a fully remote services business and principally comprises: media owners and media partners; advertising technology and software-as-a-service providers; IT equipment suppliers; and freelancers and specialist subcontractors engaged for particular projects.

As a UK services business, we assess our overall exposure to modern slavery as low. We recognise that the risk is not zero: it is highest in the manufacture of the IT hardware we purchase, and in extended supply chains behind the platforms and services we use.

Our policies

This statement sits alongside our Equality, Diversity and Inclusion Policy, our Statement on Fair Working Practices (aligned to the Scottish Government's Fair Work First criteria) and our real Living Wage accreditation, which together set out the standards we apply to our own employment practices and expect of those who work with us.

Due diligence and supplier expectations

We expect all suppliers to comply with the Modern Slavery Act 2015 and with all applicable employment law. When engaging a significant new supplier, we ask them to confirm that no form of modern slavery or human trafficking exists in their business or supply chain. We reserve the right to terminate any relationship where we become aware of a breach of these expectations, or where a supplier is unwilling to address a concern we raise.

Raising concerns

Any employee, freelancer or supplier who suspects modern slavery or human trafficking in connection with our business or supply chain should report it to either Joint CEO. Every report will be treated seriously and investigated, and no one will suffer any detriment for raising a concern in good faith.

Review

The Joint CEOs are responsible for this statement and for our compliance with it. It is reviewed at least annually and republished on our website.