MODERN SLAVERY STATEMENT OF TELEGRAPH MEDIA GROUP HOLDINGS LIMITED

This statement has been published pursuant to the Modern Slavery Act 2015

Introduction

This Statement has been prepared on a consolidated basis on behalf of both Telegraph Media Group Holdings Limited ("**TMGH**") and The Chelsea Magazine Company Limited ("**CMC**"), a subsidiary of TMGH (together, the "**Telegraph Media Group**"). Telegraph Media Group is committed to acting ethically and with integrity in all our business dealings and relationships and this statement sets out the actions Telegraph Media Group has taken to endeavour to ensure that our corporate activities and supply chains are free from modern slavery and human trafficking during the financial year ended 29 December 2024 ("**Year**").

TMGH is a limited company registered in England and Wales whose registered office is at 111 Buckingham Palace Road, London, SW1W 0DT, with registered number 14551860. CMC is a limited company registered in England and Wales whose registered office is at 111 Buckingham Palace Road, London, SW1W 0DT, with registered number 06081165.

Telegraph Media Group previously consisted of Telegraph Media Group Limited (company number 00451593) ("**TMG**") and CMC. However, as part of a corporate reorganisation, the business and assets of TMG were transferred to TMGH on 29 September 2024, with TMGH continuing business in the same way as TMG carried it on prior to the reorganisation.

Our business and supply chains

TMGH is a multi-platform media organisation and the publisher of The Daily Telegraph, The Sunday Telegraph, The Telegraph Magazine, www.telegraph.co.uk, and the Telegraph app.

CMC is a print magazine and digital publisher of lifestyle and sporting content with a wide range of brands as listed on www.chelseamagazines.com.

Telegraph Media Group is based in the UK and has a large global audience. Telegraph Media Group engages a variety of suppliers for different services. Our operations and supply chain relate mainly to the following services: printing and distribution, building and office services, events services, media services, recruitment, technology, training, marketing and advertising, customer services and retail.

Policies and Processes

We strive to maintain high standards of conduct and ethical behaviour from our employees and our suppliers:

- **Policies**: We have a Modern Slavery policy which we have embedded in our Staff Handbook and company intranet. This makes it clear what behaviour is expected of our employees in respect of modern slavery.
- **Whistleblowing**: Our whistleblowing policy encourages our employees, customers, business partners and suppliers, to report any concerns, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Business Code of Conduct**: All our Suppliers are required to confirm that they comply with our "Supplier Business Code of Conduct" before they do business with us. This sets out requirements that Suppliers provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. We undertake a higher level of due diligence if there is a higher risk of modern slavery.

- **Enhanced Monitoring**: At present no suppliers have been identified during the due diligence process as high risk. Should any supplier be identified as having a higher potential for modern slavery then this supplier would be monitored and investigated more closely by our procurement and compliance teams. Where applicable, modern slavery provisions are included in contracts.
- **Employee assurance:** We require all staff (whether permanent, fixed term, temporary or freelance) to demonstrate that they possess appropriate right-to-work documentation.

Training and Awareness

We provide our staff with training on our modern slavery obligations and emphasise the importance of our Supplier Business Code of Conduct. New joiners are assigned a modern slavery training module to complete as part of their probation, with a new joiner unable to pass probation without successfully completing the module. The training module and modern slavery policy are available year-round to existing staff. We take our modern slavery obligations very seriously and will continue to monitor compliance on an on-going basis and look for new ways to enhance the training on offer.

This statement has been approved by Telegraph Media Group's Board of Directors, who will review and update it annually.



Anna Jones
Chief Executive
on behalf of the Board of Directors