



**Reach plc**  
**Modern Slavery Act Statement**  
**for financial year ending 31 December 2024**

Reach plc (the 'Company' or 'Reach' or the 'Group' or 'We') is committed to ensuring that there is no slavery or human trafficking within our supply chains or in any part of our business. This statement is made by the Group in accordance with the Modern Slavery Act 2015 (the 'Act').

Reach fully supports the principles of the Act and outlined below are the steps we have taken during 2024 to ensure our continued compliance with the Act.

**Our structure, business and supply chains**

We create and distribute content to audiences across the UK, Ireland and the United States, through paid-for and free newspapers and magazines, and across the English-speaking world through multi-platform digital sites (desktop, mobile and app). We are driven by our Customer Value Strategy, getting closer to our customers to enhance both our content offering and our data-led advertising opportunities, helping us to improve our long-term sustainability and ensuring our activities benefit all of our stakeholders and the Group overall.

Further details on our business model can be found within our 2024 Annual Report, or on our website [www.reachplc.com](http://www.reachplc.com).

It is crucial that we develop strong working relationships with our suppliers, so we can enhance the efficiency of our business and create value, and make sure we treat suppliers in line with our values and ethical standards. We outsource a number of our activities to third-party suppliers and providers.

Our main supplier sectors include paper, contracted printing, product distribution services, and waste management and recycling. We also engage technology providers, cleaning and other facilities management services. The Group's operations and the majority of its suppliers are predominantly in the UK and comprise light manufacturing, office-based activities and distribution.

A small number of our suppliers are spread over a wider geographical area, including organisations based in North America, Ireland, Germany, India and China, and we are keen to ensure that the organisations we do business with recognise the importance of complying with the Act and other relevant slavery and human trafficking laws applicable in the regions in which we operate. We believe some suppliers will operate in higher risk territories and may present a higher risk to the business. In considering how we work with suppliers, we refer to the Global Slavery Index, to review and identify countries which could be deemed as higher risk. Risks that are specific to the sector in which Reach operates are also considered by the Group when choosing suppliers. For example, newsprint paper is sourced from countries under high standards of anti-slavery legislation - North America, UK, Europe, and Scandinavia.

We engage with our suppliers in the following ways:

- Logistics efficiencies and environmental management
- Supplier conferences
- Standard terms of business
- Regular supplier meetings, including business plan presentations
- Contingency planning
- Commitment to use of newsprint paper produced from fibre using recycled material or wood from certified sustainable forests
- Discussing key regulatory or governance changes including GDPR, Carbon or other Environmental, Social and Governance ('ESG') matters

## **Due diligence & risk management processes for Modern Slavery and Human Trafficking**

Reach has an established Modern Slavery Working Group (the 'Working Group'), chaired by the Chief Financial Officer who is a member of the Reach Board, and consists of senior managers from across the business in various functions including Operations, Legal, Technology, Risk and Internal Audit, HR and Company Secretariat. The Working Group formally meets at least twice a year and is responsible for reporting, monitoring and responding to any modern slavery issues which may arise within the business.

Whilst we believe our risk profile is low due to the UK centric nature of our operations, we recognise that the Group could be exposed to greater modern slavery risks when dealing with certain suppliers, especially those operating in higher risk territories. To help mitigate these risks, we have communicated our expectations to our suppliers, including their obligations to notify us of any breaches of the Act. Our standard purchasing terms and conditions, which are available on our website [here](#), include appropriate modern slavery provisions, requiring the supplier to comply with the Act, and all laws, regulations and government guidance relating to it at all relevant times, and to immediately notify the Group if it has reason to believe that it or any member of its supply chain is in breach, or is likely to breach the Act.

If we are informed there has been a compliance failure, the Group is willing to engage with suppliers on a case by case basis and, if possible in the circumstances, senior management will seek to agree to a resolution with the supplier that is appropriate and in compliance with our Anti-Slavery Policy (see below). If a compliance failure was to be identified, Reach would follow up with the supplier on a regular basis to determine whether appropriate action had been taken to prevent any further compliance failures.

We expect our suppliers to engage with us in a constructive and responsible way in order to resolve any issues in a timely manner. The Group reserves the right to refuse to onboard suppliers unable to demonstrate their policies on, and willingness to comply with, the Act.

Where the Group has licensees that operate in a high-risk country for modern slavery purposes, our Anti-Slavery Policy forms part of the contractual arrangements and confirms the standards expected from contractors, suppliers and other business partners.

Senior managers within the Group are instructed periodically to review their active suppliers (with a material spend), or if there was any reason to seek direct confirmation from the supplier due to the supplier's country of operation or the nature of the product supplied, and provide confirmation to the Working Group whether any high-risk suppliers had been identified. For 2024, the Group undertook a review of its existing suppliers. The review entailed taking a sample of the Group's suppliers based on the following: a specific monetary spend with the business; new suppliers onboarded during the year; suppliers in higher risk categories; suppliers in higher risk countries; and all tier 1 suppliers not covered by these parameters. Each supplier's modern slavery statement was reviewed if available, or they were written to and asked to complete a questionnaire.

The Working Group also introduced a modern slavery risk register. During 2024, the register was reviewed and discussed at each meeting.

The Anti-Slavery Policy, and staff obligations under this policy, continued to form part of the annual compliance training for all employees. The Anti-Slavery Policy was last reviewed by the Working Group in May 2024, and approved by the Reach plc Board in May 2024.

## **Reach's policies and training in relation to slavery and human trafficking**

In keeping with Reach's commitment to act ethically, sustainably and with integrity in relation to all its business dealings, many of our existing policies are relevant and mutually supportive in ensuring that modern slavery practices or human trafficking activities are not tolerated in any part of our business.

Reach's Standards of Business Conduct Policy applies to all employees within the Group. This policy is an overarching document that sets out, in practical, common-sense terms, what acting in a professional, moral and ethical manner means on a day-to-day basis. All staff are issued with our

Standards of Business Conduct Policy when onboarded, which aids the promotion of our ethical culture within the business.

Reach's Anti-Slavery Policy, which is reviewed and updated on a regular basis, details the signs that identify modern slavery, describes the responsibilities of staff to look out for such indications, and explains how to report any suspicions to senior management (including through the use of the whistleblowing hotline, described below). The Anti-Slavery Policy can be found on the Policies section of our website [www.reachplc.com](http://www.reachplc.com). We have enabled our staff to understand more about modern slavery in the workplace by providing additional information and guidance, such as referring staff to the UK Government's modern slavery website.

The Group's Procurement Policy seeks to ensure the Group does not take on unacceptable risks when onboarding a supplier, including those relating to modern slavery. During 2023, a revised onboarding and due-diligence process was introduced which required business managers to assess the risk of modern slavery occurring in any existing or proposed new supplier. During 2024, this process was embedded within the business and now forms part of regular checks for suppliers in each business area.

In 2025, the modern slavery assessment process will be embedded in the intake to procure process, whereby all new suppliers to the Group will be expected to confirm they adhere to the requirements of the Act before being onboarded. This will be captured digitally within our centralised procurement system. Additionally, as part of the overall third party risk management process, all Tier 1 suppliers (or those deemed high risk) will undergo yearly assessment for modern slavery.

The Group expects its suppliers to adhere to the requirements of the Act and will not engage a new supplier if we are informed they exploit workers, disregard health and safety laws and wilfully damage the environment.

The Standards of Business Conduct Policy, the Anti-Slavery Policy and the Procurement Policy form part of the suite of policies that all employees are required to confirm they have read and understood on an annual basis. These policies are reviewed by the Executive Committee and Board on an annual basis and each have an executive sponsor and owner who is responsible for the policy.

A summary of the Group's Procurement Policy and Standards of Business Conduct Policy can be found in the Corporate Governance section of our website [www.reachplc.com](http://www.reachplc.com).

We operate a Group-wide whistleblowing policy (the Speak Up Policy), and an independent reporting hotline to facilitate confidential reporting of illegal or unethical behaviour. Staff are able to report anonymously. All complaints raised by staff are investigated by senior management. During 2024, the Group had no reports involving modern slavery issues or concerns.

We have embedded Group policies which strictly prohibit any form of discrimination based on gender, race, disability, sexuality, religion or age in the workplace. We respect the human rights of our employees by ensuring all employees are issued with clear contracts of employment, that working hours as standard are set within the working time directive maximum thresholds, and have committed to ensuring that no employee will be forced to opt out of applicable working time regulations. Our employees are paid for work undertaken and receive holidays and rest periods in line with regulations. We monitor employees' holiday usage to ensure they take statutory entitlements, reducing the risk of breaches of regulations by publishing employee entitlements. Under our contracts all of our employees are paid above national minimum wage thresholds. The Group does not have any zero hour contracts.

During 2024, as part of our annual compliance training programme, managers who have direct line management responsibility, were required to complete a training module on modern slavery. The training module included further details on how modern slavery can affect our business and how to identify and report it. The training module is reviewed annually before the annual compliance training is launched to employees.

### **Impact and monitoring**

The Working Group measures progress by monitoring the completion levels of online training, and of employees completing their annual compliance training and confirming they understood their obligations under the Anti-Slavery Policy. Completion of the training was compulsory in order to receive a bonus. Failure to complete the training could also result in disciplinary action.

The Working Group also monitors responses from suppliers who were contacted to confirm their modern slavery arrangements as part of the due-diligence exercise explained earlier. No issues in respect of modern slavery were identified in 2024.

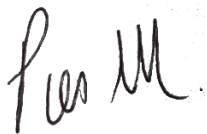
### **Effectiveness and ongoing compliance**

The Working Group will continue to meet throughout 2025 in order to monitor the implemented controls. The Company will assess the suitability and effectiveness of its processes and report on progress on an annual basis, in compliance with the Act.

As the inherent supplier risks change over time, we will review and update our policies and approach to addressing slavery and human trafficking risks in the Group's supply chain. We will also continue to monitor any government guidelines on best practices for UK companies and adopt the necessary changes.

This statement is made pursuant to section 54(1) of the Act and constitutes the Group's modern slavery and human trafficking statement for the financial year ending 31 December 2024.

Approved by the Board of Directors of Reach plc on 14 May 2025,



Piers North  
Chief Executive Officer

### **List of subsidiary Group companies within scope of section 54(2) of the Modern Slavery Act 2015**

- MGN Limited
- Scottish Daily Record and Sunday Mail Limited
- Express Newspapers
- Reach Midlands Media Limited
- Reach Regionals Media Limited
- Reach Printing Services Limited