Financial Times Modern Slavery Statement

The Financial Times (FT) does not tolerate modern slavery or human trafficking in our organisation or in our supply chain.

Our Code of Conduct (Code), which sets out the standards we expect of all staff, makes clear that we support universal human rights, including equal employment, freedom of speech and of association, and cultural, economic and social well-being. We strongly oppose illegal or inhumane labour practices, including slavery, servitude, forced or compulsory labour and human trafficking. You can read more about this in the Corporate Social Responsibility section of our Code of Conduct.

The FT is committed to tackling slavery through the assessment of risk in our supply chain, due diligence on our suppliers, and awareness-raising activities both within the FT and more broadly through our journalism and events.

If you have any queries about this statement or our approach to modern slavery, please contact communications@ft.com.

Our group structure

Financial Times Group Limited is a private limited company incorporated in England and Wales and wholly owned by Nikkei Inc. incorporated in Japan. It is the holding company for the Financial Times group of companies ("FT Group") with subsidiaries in countries and regions such as the UK, USA, Singapore, Germany, The Philippines, The Netherlands, Mainland China and Hong Kong (SAR), and smaller editorial operations in a number of other countries. The Financial Times Limited ("FT"), incorporated in England and Wales, is the principal trading entity within FT Group.

FT Group is one of the world's leading business news and information organisations, publishing a range of titles digitally and in print, and running conferences and events. We have approximately 2,700 staff globally. More detailed information about our business can be found here.

Responsibility

The FT Group management board takes its commitments to preventing modern slavery and protecting human rights very seriously, and has responsibility for producing this statement.

The Legal and Compliance, Internal Audit, HR, Procurement and Communications teams, plus the Senior Management Group and other line managers, have a particular responsibility for ensuring the FT Group and its staff meet these standards, that our workers are protected, and that risks are identified and appropriately mitigated. All staff throughout our organisation have responsibility for adhering to the standards set out in this statement.

Our supply chain

When defining its procurement processes, the FT Procurement team adopted the Chartered Institute of Procurement and Supply (CIPS) Framework thereby ensuring, where appropriate, that all procurement is conducted in an ethical and sustainable manner.

FT procures many different goods and services from a range of suppliers, the large majority of which are based in advanced OECD countries, mainly UK, USA and in Europe. These include:

- printing, publishing and distribution services for our newspaper and magazines;
- the supply of newsprint, which is mainly from Finland, South Korea and the US;
- the hire of venues on a worldwide basis for our conferences and events;
- the purchase of IT hardware and software;

- facilities services, including travel management and building services for our offices around the world;
- branding and marketing of our products and services;
- recruitment and training;
- customer services;
- professional services of advisors such as lawyers and auditors; and
- freelance editorial staff, including journalists.

Whilst we generally operate in low risk areas, we have identified some areas of risk within our supply chain. This assessment is based on the country risk i.e. suppliers in countries where slavery is more prevalent based on the Global Slavery Index; and the industry risk i.e. some industries in which we operate are more vulnerable to slavery than others.

We consistently work with areas of the business that have been identified as medium risk to establish further steps that we can take, and are taking, to strengthen our approach and to ensure good working practices. This has included in-depth reviews of printing, distribution and our global conferences and events business.

Due diligence on our suppliers
Since 2016 we have worked hard to improve and embed our supply chain risk assessment and due diligence process. Our procurement system ensures due diligence is carried out on all new suppliers logged on the system, allowing us to assess the risks involved in the supply of goods and services. The procurement system also enables us to complete periodic reviews of due diligence, and take appropriate action particularly where a risk of slavery exists in a country or industry.

All new suppliers logged through our procurement system are expected to complete our Modern Slavery Due Diligence Questionnaire. This allows us to make an assessment of risk based on the following criteria:

- location and industry, using data from the Global Slavery Index;
- the stance the supplier takes on modern slavery, including the content of their modern slavery statement and the training the supplier provides to its key staff;
- steps taken to ensure that slavery and human trafficking is not taking place in their business or supply chains, including whether the supplier is active in any of the highest risk countries or sectors.

This helps us to make appropriate decisions regarding whether, and how, we work with those suppliers.

In addition to this formal due diligence process, our personnel working in medium risk areas, as identified above, are encouraged to maintain close working relationships with their suppliers, including on-site visits to distributors and print sites.

Our journalism
FT has always maintained its editorial independence, allowing us to engage more broadly with this topic through our reporting and to raise awareness of human rights issues including anti-slavery within business.

Over the years we have regularly published articles about slavery covering, for example: slavery in food and agriculture; the prevalence and dangers of online exploitation; forced labour in the UK; tightening standards in supply chains and the importance of responsible investing.

Our journalism continues to raise awareness of modern slavery and its prevalence globally. Over the years, our journalism has highlighted the increase in modern slavery and reported on the importance of conducting due diligence on suppliers in the supply chain. Our most recent coverage on the topic of modern slavery on FT.com can be found here.

Internal awareness raising and training

We believe it is important to ensure our staff understand the issues of modern slavery and our commitments, as a business, to upholding high ethical standards. Our key personnel regularly attend external events to broaden their knowledge and understanding of modern slavery and use this to raise awareness among key teams across the business.

We understand that modern slavery is not a static issue and therefore we are committed to continuing our efforts to raise awareness of the impact of slavery across the globe. We hold annual internal events to coincide with Anti-Slavery Day to raise awareness among staff, as well as rolling out additional workshops and training, both online and face-to-face. This reinforces our continued commitment to act ethically and to meet our obligations to prevent modern slavery.

Our staff

We have staff based in a number of countries and regions around the world, including the UK and Europe, USA, The Philippines, Mainland China and Hong Kong (SAR). We strongly believe our staff should be treated fairly and decently wherever they are based.

Our Code of Conduct applies to all FT staff globally; all staff are required to certify that they have read and understood our Code of Conduct on an annual basis. Our values mean we respect the human rights and dignity of people. We support universal human rights, including equal employment, freedom of speech and of association, and cultural, economic and social well-being. We oppose illegal or inhumane labour practices, including slavery, servitude, forced or compulsory labour and human trafficking.

The Code highlights to staff that FT's business partners, including suppliers, vendors and distributors, are expected to meet the same high standards as FT when working on our behalf. In addition, our Code requires all staff to report any known or possible violations of laws, regulations or the Code to FT management or using the mechanisms outlined in our Whistleblowing Policy.

Our company policies aim to ensure a fair approach to all of our staff covering areas such as dignity at work, equal opportunities, and anti-discrimination including during recruitment, promotion and performance management. We operate a fair approach to recruitment in all regions and ensure that there is no discrimination either in the application process or once an employee is engaged. We also have favourable policies covering maternity, paternity and shared parental leave, where statutory requirements are always met and in some cases enhanced.

We are committed to paying a fair wage to all employees, always adhering to minimum wage legislation and guidelines. In London we ensure that all employees, including interns, are paid the recommended London Living Wage as a minimum. Our salaries are regularly reviewed in all regions to ensure that all employees are fairly remunerated for the jobs they do. We ensure that staff in all regions have fair working hours which adhere to local legislation and recommended guidelines, and include paid holiday days which meet and often exceed statutory requirements.

Our continued work

FT Group remains committed to our zero tolerance approach to modern slavery and human trafficking in our organisation and in our supply chain. This is our eighth annual statement and sets

out the key steps we have taken in the financial year ending 31 December 2022 and provides information about the actions we are planning to take during 2023.

Since our last statement we have taken the following steps in our continued efforts to ensure that slavery and human trafficking is not taking place in our organisation or in our supply chain:

- As part of our Anti-Slavery Day 2022, we issued internal communications to our employees to raise awareness of the signs, dangers and consequences of modern slavery. We also displayed content on screens throughout our London, New York, Hong Kong and Manila offices to further raise awareness of modern slavery. We hosted a training session for employees, which provided information on how to identify situations where people may be at risk in our operations and how to report such risks internally.
- We updated and circulated our new anti-slavery training module, and reminded employees organising external events of the need to complete our training. This module helped us to prioritise modern slavery training in relevant areas throughout the business and better track completion rates.
- We implemented a new Procurement System which enables suppliers to more easily and efficiently complete our due diligence. This ensures we can discover and make appropriate decisions about any modern slavery risks of potential new suppliers prior to onboarding and continue to prevent modern slavery within our supply chain.
- Since conducting internal risk assessments throughout our business, we have reviewed responses to check that new areas of risk in relation to modern slavery have not developed and ensure the processes we have in place for previously identified ‘higher risk areas’ are still working. For any anti-slavery risks, mitigations were identified and completed; only low risks were identified which indicates our processes are working, and mitigating actions only required that we circulate our Modern Slavery Statement to areas of the business that had indicated that they had not recently read it.
- We have conducted a thorough review of our print and distribution operations globally regarding previously identified areas of risk, with a particular focus on the supply chain, from printing our products through to distribution to customers. This review included training and awareness of employees on the ground, during which we provided them with a checklist to use when auditing third party operations. This has equipped our employees with the skills required to recognise signs of modern slavery, and provided them with clear guidance of what to do if they are suspicious or concerned about potential modern slavery risks.

We plan to take the following steps in 2023 to further develop our anti-slavery programme:

- We will review and update our modern slavery training module on our new training platform. This platform has been carefully selected to allow us to more efficiently report and track employees' completion of our training, as well as enabling us to automatically issue reminders to those enrolled.
- We will continue to raise awareness of the social and ethical issues of slavery on Anti-Slavery Day throughout our global offices. This includes continuing to issue internal communications to our employees to raise awareness of the signs, dangers, and consequences of modern slavery. We will also be providing our modern slavery training to relevant teams, and instructing them how to identify situations where people may be at risk within our operations, and how to report concerns.
- We will continue our review of our internal risk assessments, which includes a specific section on anti-slavery to ensure that any new areas of risk have not developed. We will ensure the mitigations we have in place for previously identified ‘higher risk areas’ are still working.

- The print and distribution team will continue to use the skills acquired during their training to monitor on-the-ground operations at printing sites, ensuring the employees of our suppliers know our stance on modern slavery and how to raise concerns of modern slavery risks that may arise.
- We will continue to provide our Modern Slavery Statement to the suppliers we work with to emphasise our zero tolerance approach to modern slavery and human trafficking in our organisation and in our supply chain, and to reinforce the standard expected of our suppliers.
- We will conduct an audit of completed modern slavery due diligence on our Procurement System to ensure we have conducted a thorough review of modern slavery risks in our supply chain when onboarding new suppliers.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Financial Times Group Limited's slavery and human trafficking statement for the financial year ended 31 December 2022.

Approved by the board of directors and signed on behalf of Financial Times Group Limited by James Lund, CFO.

James Lund
Chief Financial Officer
Financial Times Group Limited