

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of Newsquest Media Group Limited and its publishing subsidiaries: Newsquest (Clyde & Forth Press) Ltd and Newsquest Community Media Limited. It sets out the steps taken during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in our business and supply chains.

1. Organisation Structure, Business and Supply Chains

Newsquest Media Group Limited and its subsidiaries are publishers of regional newspapers and providers of digital marketing services, operating predominantly within the United Kingdom.

The majority of our operating costs relate to employment. We operate in compliance with UK employment legislation, including the National Minimum Wage and Working Time Regulations. Our supply chains include the procurement of publishing materials such as newsprint, ink, and printing plates, distribution and logistics services, business premises, technology and systems providers, third-party news agencies, and recruitment agencies. Suppliers are primarily based in the UK, North America, and Europe.

2. Policies in Relation to Modern Slavery and Human Trafficking

We operate a Modern Slavery Policy which reflects our commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking.

The policy applies to employees, directors, contractors, and business partners. Reporting arrangements are set out in our staff handbook and contractual documentation. Breaches by employees may result in disciplinary action, while breaches by suppliers or other third parties may result in termination of the business relationship, subject to internal processes.

Supplier contracts include provisions requiring compliance with the Modern Slavery Act 2015 and confirmation that suppliers have taken appropriate steps to ensure that modern slavery and human trafficking are not taking place in their operations or supply chains.

3. Due Diligence Processes

We seek to identify and assess potential risks of modern slavery within our business and supply chains through proportionate due diligence processes.

Recruitment practices include right-to-work checks for all employees. Recruitment agencies are required to comply with relevant employment legislation, including the Modern Slavery Act 2015.

Supplier due diligence is supported through procurement processes and systems, including contractual assurances and onboarding checks. Based on these processes, we are not aware of any instances of modern slavery or human trafficking within our operations.

We operate a Whistleblowing Policy and Ethics Helpline, which provides confidential channels for employees and third parties to raise concerns, including those relating to potential modern slavery risks.

4. Risk Assessment and Risk Management

We recognise that the risk of modern slavery varies depending on the nature of business activities and supply chains. We keep our policies, procedures, and controls under review to identify and manage potential risks. We recognise that potential risks may arise in areas such as third-party supply chains and the use of recruitment agencies, and we seek to manage these risks through proportionate due diligence and oversight.

As part of our people and governance framework, we use HR systems, including Cascade, to support accurate record-keeping, policy communication, and workforce oversight. These systems support transparency and consistency across employment practices.

AI-enabled tools are used in a limited and controlled way to support administrative and analytical activities within HR processes. These tools are not used to make automated employment decisions and operate with appropriate human oversight. Their use is intended to support accuracy, documentation, and consistency.

5. Measuring Effectiveness

We seek to assess the effectiveness of the steps we take to prevent modern slavery and human trafficking by reviewing our policies, procedures, and controls on an ongoing basis.

During the reporting period, we continued to review recruitment practices and supplier due diligence processes to ensure they remain appropriate. Supplier compliance is supported through procurement systems, including Coupa, which provide visibility of supplier information and contractual requirements.

We also use HR systems, including Cascade, to support record-keeping, policy acknowledgement, and workforce oversight. These systems assist in maintaining transparency and consistency in people-related processes.

We continue to promote awareness of our Whistleblowing Policy and Ethics Helpline. Information received through these mechanisms is reviewed and, where appropriate, investigated.

We will continue to review the effectiveness of these measures and take steps to strengthen our approach where necessary.

6. Training and Awareness

We are committed to promoting ethical behaviour and awareness of modern slavery risks across the organisation. Employees have access to policies and guidance that support compliance with legal obligations and expected standards of conduct, including those relating to modern slavery and human trafficking.

During the reporting period, we continued to promote our Code of Conduct and ethics-related guidance, supported by training and awareness activity. This includes training on ethical standards, appropriate behaviour, and speaking up, which reinforces expectations around fair treatment and responsible business practices.

We also maintain a Diversity, Equity and Inclusion (DEI) committee, which supports discussion, awareness, and engagement on inclusion-related matters across the organisation. While the committee does not have an operational role in modern slavery risk management, it contributes to a culture of respect, dignity, and inclusion, which underpins our wider approach to ethical conduct.

We continue to review training and guidance to support understanding of relevant risks within recruitment and supply chains.

This statement has been approved by the Chief Executive Officer of Newsquest Media Group Limited and signed on its behalf.

This statement will be reviewed and updated annually.

Signed:



Henry Faure Walker
Chief Executive Officer

Date:

01/22/2026