

# **NATIONAL WORLD PLC**

## **Modern Slavery and Human Trafficking Statement**

**Financial year ended 31 December 2022**

This statement sets out National World's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business or its supply chain.

This statement relates to actions and activities during the current financial year.

National World is committed to operating all of its Group's business activities to the highest standards of business ethics and integrity. We are committed to understanding more about modern slavery and ensuring there are no modern slavery concerns in our business or supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have zero tolerance to slavery and human trafficking, and we are committed to continually improving our practices to combat slavery and human trafficking. As part of our commitment, we have a dedicated compliance team which consists of individuals from our Central Services, Legal and Human Resources departments.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have put in place a designated Modern Slavery and Human Trafficking Policy, to demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending on 31 December 2022, and for the forthcoming year.

### **Organisational structure and supply chains**

National World is one of the largest local and regional media organisations in the UK. We provide news and information services to communities through our extensive portfolio of publications and websites.

Our supply chain consists of:

- Freelance editorial suppliers based predominantly in the UK;
- Large and small technology suppliers, based in both the UK and overseas;
- Awards and live events suppliers based predominantly in the UK; and
- Other suppliers of business services based predominantly in the UK.

### **Supply chain risks**

The Group's suppliers are mostly based within the UK which has a developed culture of ethical business practice and strong labour regulation. We have therefore assessed the overall risk of the Group contracting with organisations that engage in slavery or human trafficking as relatively low. However, we have recognised that a risk in our supply chain exists where the Group contracts with technology suppliers based overseas or which have staff operating overseas.

### **Acts to address risks**

We undertake the following activities on an ongoing basis to assess and mitigate the risk of modern slavery within our business or supply chain:

- Conducting an internal risk assessment to identify which of the Group's suppliers are most likely to manufacture goods or provide services in countries and/or sectors where modern forms of slavery are more likely to be prevalent;
- Consulting with those suppliers whom we have identified as presenting significant inherent risk in order to understand more about their own businesses, supply chains and the steps they have taken to reduce the risk of slavery and human trafficking;
- Reviewing the Group's existing contractual arrangements and identifying ways these can be strengthened to further reduce the risk of slavery and human trafficking in our businesses and supply chains; and
- Providing anti-slavery training to all staff in accordance with the Modern Slavery Act 2015.

### **Due diligence processes for slavery and human trafficking**

National World recognises that everyone in the workplace should be able to raise concerns of abuse or labour exploitation if they come across incidents through their work. Our Modern Slavery and Human Trafficking Policy requires that employees raise concerns via their line manager or an external whistleblowing hotline. If an employee has concerns that someone they come into contact with in the course of their work might be breaking modern slavery legislation, or that National World processes or procedures might be doing so, they should raise this as a concern via their line manager or the whistleblowing hotline and it will be investigated.

Prior to entering into agreements with suppliers, they are issued with a compliance form which is designed to assess areas of potential risk within our supply chains. The form also aims to ensure that suppliers have their own clearly defined ethical working practices. This includes (i) having suitable anti-slavery and human trafficking policies and processes within their businesses and (ii) confirmation that they comply with the requirements of the Modern Slavery Act 2015. This helps us to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chain;
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers.

We will continue to monitor the Group's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place in the Group's supply chain and/or businesses.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide training modules and welcome an open dialogue with our staff in respect of perceived or actual human rights violations.



Signed.....

David Montgomery, Executive Chairman

Dated: 15<sup>th</sup> May 2023