



## **Modern Slavery and Human Trafficking Policy**

### **1. Introduction**

This statement covers the activities of Drama Republic Limited, and its subsidiary companies (collectively, "DR"). This statement sets out DR's actions to understand 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 business and its supply chains.

As part of the television and media industries, DR recognises that it has a responsibility to take a robust approach to slavery and human trafficking. DR is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement has been added to the government Modern Slavery Statement Registry and can be found at Modern slavery statement registry - GOV.UK ([modern-slavery-statement-registry.service.gov.uk](https://modern-slavery-statement-registry.service.gov.uk)), to show that we are committed to taking measures to fight this issue.

### **2. Organisational Structure and Supply Chain**

DR is a UK production company, which is majority owned by Mediawan Group, headquartered in Paris. DR produce programming for a wide range of major broadcasters in the UK and USA.

### **3. Countries of Operation and Supply**

DR currently has companies in the United Kingdom only.

Due to the nature of DR's work, operations can extend into countries across the globe during the making of television productions. The following is the process by which DR assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Overall risk assessment of DR's activities is undertaken by members of the legal team with input from finance and HR colleagues and with general oversight by senior management and the governing board.
- Risk assessments for individual productions are undertaken by the line producer/production manager working with the Executive Producer/Series Producer/Producer Director, with the latter being the main person legally responsible for the shoot. All risk assessments are also forwarded to our external health and safety counsel, 1<sup>st</sup> Option Safety, to review. Each broadcaster also requires production companies under commission to comply with the broadcaster's corporate policies and due diligence procedures.
- Finance staff in collaboration with production management adhere to internal due diligence procedures when engaging suppliers including checking the standing of companies in both domestic and foreign jurisdictions and taking industry references.
- Any concerns about a supplier are escalated to the senior management team of the relevant subsidiary company and to Drama Republic's central legal and senior management teams where necessary.
- Due diligence checks are being done on overseas fixers who are selected by obtaining recommendations from employees, film commissions and/or other industry partners. Where possible, references are checked and desktop searches about the fixer are undertaken.

#### **4. High-Risk Activities**

We do not consider our business activities to pose a high risk of modern slavery. In terms of our supply chains, we regard the risk factors to be territorial and whether a supplier is a significant supplier of people. Our modern slavery procedures will continue to be risk based in this manner, with our attention focussed on areas of higher risk.

#### **5. Responsibility**

Responsibility for the organisation's anti-slavery initiatives is as follows:

- Policies: Policies are drafted by the legal team and reviewed by the relevant finance and HR staff with oversight from senior management. Policies are developed based on government guidance, legislation and industry best practice.
- Risk assessments: Risk assessment with regards to human rights and modern slavery risk analysis is undertaken annually by the legal team in consultation with finance and HR colleagues.
- Investigations/due diligence: All staff are encouraged to raise concerns to either their line manager or to HR in relation to known or suspected instances of slavery and human trafficking. Legal and finance staff along with senior management are engaged as required.
- Training: DR will provide modern slavery training to all staff on a regular basis. DR actively encourages staff to request training opportunities.

#### **6. Relevant Policies and Contractual Obligations**

DR operates the following policies and ensures the appropriate contractual obligations are in place to mitigate the risks of modern slavery and outline steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing Policy: DR encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Drama Republic's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns can complete our confidential disclosure form.
- Contractual obligations: DR's contracts with staff and suppliers contain an obligation to ensure that their actions and behaviour are appropriate and an obligation to adhere to all company policies and procedures. DR strives to maintain the highest standards of employee conduct and ethical behaviour within its operations and its supply chain.

#### **7. Due Diligence**

DR undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Following a risk assessment of DR's due diligence and practices, the organisation is putting in place further procedures and training to ensure the organisation is:

- assessing the geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of supply chains;
- conducting supplier audits or assessments where risks have been identified;
- taking steps to improve procedures for engaging suppliers who operate in high risk jurisdictions, including contracting with suppliers on the organisation's standardised supplier contracts which require each supplier to adhere to the organisation's corporate policies;
- providing advice to suppliers if substandard practices are identified; and

- invoking sanctions against suppliers that seriously violate the conduct expected of each supplier, including the termination of the business relationship.

## 8. Training

The organisation will require all relevant staff who are to undertake any production activities in high risk countries and/or who are in relevant DR central roles to complete an internal training course. The organisation's modern slavery training will cover:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- how to contract with suppliers to ensure the supplier is obliged to prevent modern slavery and human trafficking within its operations; and
- what steps DR should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the DR's supply chains.

## 9. Awareness-Raising Programme

As well as training staff, DR is working to raise awareness of modern slavery issues by providing access to relevant information on the organisation's intranet and drawing staff's attention to this via email. The information provided will include:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

## 10. Board approval

This statement was approved on 22 November 2022 by the organisation's board of directors, who review and update it annually.

*Greg Brenman*

Signature: [Greg Brenman \(Nov 24, 2022 12:15 GMT\)](#)

**Greg Brenman (CEO, Drama Republic Ltd)**

*Roanna Benn*

Signature: [Roanna Benn \(Nov 24, 2022 12:14 GMT\)](#)

**Roanna Benn (CEO, Drama Republic Ltd)**

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## 22.11.22

Final Audit Report

2022-11-24

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