

# **Statement on Modern Slavery and supply chain values**

PA Media Group | May 2024



# Introduction

## About our business

Founded in 1868, PA Media Group (the 'Group') comprises a diverse portfolio of specialist media companies, spanning news and information, technology and communications services.

Our flagship brand **PA Media**, formerly The Press Association, is the national news agency for the UK and Ireland. Our reporters, photographers and video journalists deliver the top national news stories of the day, as well as breaking news from around the world. In addition to reporting on the news, our **PA Media Academy** business is Europe's leading journalism, writing, multimedia and public relations training business. Meanwhile our **PA Mediapoint** offering is an unrivalled news monitoring solution, connecting PR and communications professionals with journalists through trusted distribution channels.

Over 155 years, our organisation has grown and diversified into new markets, both in the UK and more globally. **PA Betting Services** has built a legacy of serving the racing and betting industry that stretches back over 60 years, with unrivalled horse and greyhound racing coverage. Our **PA TV Metadata** business has more than 30 years' experience of TV broadcasting data aggregation, with its market-leading TV listings service relied upon by the best websites, apps, newspapers and magazines in the media industry, including Sky and the Radio Times.

We have a strong track record in acquiring companies that complement our Group

activities, adding seven fantastic businesses to our portfolio over the last 15 years. Our streaming business **StreamAMG** delivers live and on-demand video services to customers across the world. We provide strategy, creative, editorial and analytics services through **Sticky**, our digital marketing agency based in London, and **Hydrogen**, our social media agency based in Glasgow. Most recently in 2023 we acquired **iRace**, Asia's leading horse racing technology, data, information and publishing business, which sits well alongside our existing racing and betting operations.

Stock images business **Alamy** joined our Group in 2020. Its platform has one of the world's most diverse creative and editorial stock imagery collections, with over 360 million images, vectors and videos. Alamy's fantastic ecosystem of 156,000 content creators supply over 150,000 new, authentic images every day onto the Alamy platform.

We have over 1,000 people across our global teams who are the driving force behind everything that we do. The majority of our people work in the UK, many based in our Paddington head office in London and our Howden office in East Yorkshire. We have a further seven offices in the UK as well as bases in Westminster, the Royal Courts of Justice and Holyrood.

Our global operations are managed through a number of international subsidiaries. We have operations in Ireland and Australia, and following

acquisitions in recent years, have expanded our international footprint into the United States, India, Malta and Singapore.

Our services are delivered by our people alongside an extensive global supplier network. Our largest vendors are technology and software companies, sports rightsholders and telecoms providers. We work with freelance journalists, videographers and producers, who help deliver our day-to-day editorial services, as well as casual elections reporters and data operators who provide invaluable ad hoc support.

## About this statement

Modern slavery encompasses various forms of coercion where individuals are exploited for personal or commercial benefit. Defined by the International Labour Organisation ('ILO') in its 2022 report, modern slavery includes human trafficking, sexual exploitation, domestic servitude, and forced or bonded labour. It is characterised by the inability of individuals to reject or escape their circumstances due to threats, violence, coercion, or the abuse of power.

The UK's Modern Slavery Act 2015 (the 'Act') requires commercial organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. This statement must set out the steps an organisation has taken, if any, during its financial year to ensure that there is no slavery, forced labour or

human trafficking in its business and supply chains.

In accordance with Section 54, Part 6 of the Act, this report sets out the steps taken by PA Media Group and all relevant subsidiaries (see the PA Media Group 2023 Annual Report for a full list of subsidiaries) to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business, covering the period 1 January 2023 to 31 December 2023.

We support the aims of the Act and are committed to addressing the risks of modern slavery in our operations and supply chain. Throughout the review year, no reports of modern slavery practices were received. Given the nature of our operations, we do not consider our operations to be at high risk of these practices.

Nonetheless, it is important to us that all individuals associated with our organisation – both internally or externally through our supply chain – are vigilant and understand the risks of modern slavery and its incompatibility with our values of accountability, collaboration, integrity and respect. We encourage anyone to report potential violations through our dedicated and confidential channels.



**James Goode**  
Chief Financial Officer

29 May 2024

# Our business framework

## Our PA Media Group values

Our renowned heritage is just as important to us as our ambitions. Every day, people across the organisation are driven to uphold the values that have underpinned our flagship brand for over 155 years.



### Accountability

We are accountable for our own results, committed to turn thoughts and ideas into action and to pursue excellence. Being accountable means that we are answerable for our actions and those of our teams.



### Collaboration

At the heart of our business strategy is the understanding that we are all stronger together. We collaborate to achieve shared goals and acknowledge the value of each other's skills, experience, creativity and contributions.



### Integrity

We act with integrity in all of our actions and consistently treat one another fairly, sharing our views in a way which is fair, sincere and respectful. Integrity is the foundation of all good relationships within the business and with our partners.



### Respect

Every person, no matter their role, plays an important part in delivering our organisation's purpose. We listen to and respect one another's opinions and value their contributions.

For over 155 years, our organisation has been at the heart of the UK and Irish media sectors. As we have expanded both organically and through strategic acquisitions, locally and internationally, our business framework has been continually refreshed to align our evolving operations with our core values and mission.

We are firmly dedicated to upholding the highest standards of human rights across all aspects of our business. This commitment drives us to adhere to globally recognised principles for ethical business conduct. We focus on ensuring fair labour practices and fostering an environment of transparency and accountability. By integrating these ethical standards into our operations, we strive to maintain a responsible and principled global presence.

Our core values are integral to our culture, influencing our recruitment, code of conduct, employee training, annual performance reviews, and recognition programmes. Our workforce, mainly comprising skilled full time and part time employees based in our office locations, are employed in accordance with local labour laws and are compensated fairly at market rates.

We operate a diverse and complex supply chain, spanning multiple industries and regions, businesses and individuals, each with unique risks and challenges. Consequently, elements of our supply chain show mixed maturity in implementing best practice control measures. Our approach is to work proactively and collaboratively with these suppliers to help elevate their practices to our standards.

It is vital for our operations that we not only understand but actively address potential exposures to modern slavery in our supply chains, whether direct or indirect. Our goal is to continually refine our risk management strategies to ensure robust prevention and swift response to any violations, thereby safeguarding our supply chain integrity.

Our governance framework and escalation mechanisms are underpinned by our Board, our executive team, our Audit Committee and our internal risk committee. In 2023 we developed our new Group sustainability strategy and have published our first sustainability report. This considers the environmental, social and governance factors most relevant to our organisation and sets out our longer-term aspirations for our business. In 2024 we are excited to launch a new internal ESG committee to integrate sustainability more deeply into our decision-making processes.

We continually evaluate our business practices through metrics such as employee engagement survey results, the frequency of whistleblowing incidents/complaints, and the percentage of contracted spend subjected to enhanced due diligence procedures. These indicators help us gauge the efficacy of our actions and guide our improvements over time.

We are committed to enhancing our governance and reporting structures to best serve our stakeholders and uphold our commitment to ethical practices and sustainability.

# Our procedures

Ethical trading, responsible sourcing, and the prevention of modern slavery and human trafficking are imperative to our Group's operations. We actively refine our risk assessment processes to address emerging risks and ensure compliance throughout our organisation and supply chain.

Our internal Risk Committee, chaired by our Head of Sustainability and sponsored by our Group CFO, leads our efforts against modern slavery. This committee includes senior leaders from finance, HR, and legal departments and coordinates closely with procurement and facilities teams to maintain regular oversight.

## Within our organisation

Guided by our commitment to equity, diversity, and inclusion ('EDI'), our HR team develops our people strategies to nurture our workforce, supported by managers across all divisions. We implement comprehensive employee policies that safeguard against unfair practices and foster a fair, inclusive workplace environment. These policies cover various aspects, including holidays, sick pay, and working conditions.

We prioritise our employees' physical and mental wellbeing through access to healthcare plans, an employee assistance program, a free subscription to the Calm app, an annual Wellbeing Day and volunteering hours to contribute positively to our local communities. Additionally, over 40 trained mental health first aiders across our Group offer support and guide employees to appropriate resources.

Our in-house talent acquisition function handles most recruitment, ensuring compliance with employment laws through onboarding checks. This includes identity verification, reference checks, right to work check, and, where applicable, validation of education and professional qualifications. We selectively use agencies for a small number of roles which require specialised technical skills, such as software engineers and legal professionals.

We empower our employees to report any legal or ethical concerns through their line managers, relevant executives or directly to the Audit Committee Chair, ensuring that all concerns are addressed seriously and sensitively. Further, our employee council Your Forum comprises 12 elected representatives, and is designed to create a constructive, two-way discussion between our people and our executive team.

## Across our supply chain

We are committed to fostering ethical supply chain practices and expect all our suppliers to align with our high standards of conduct. This includes adhering to anti-slavery and human trafficking policies that reflect our organisational and legal obligations. We clearly communicate our expectations and actively work with suppliers to ensure these are met.

Our Group procurement team is tasked with managing our diverse and global supply chain. The vast majority of the goods and services provided to the Group are fulfilled in the UK, in

sectors which are not typically considered at heightened risk of modern slavery. However we recognise that some suppliers, with extended supply chains in high-risk sectors or regions, might be more vulnerable to unethical practices. Our due diligence processes are tailored accordingly and are designed to evaluate the supplier's practices thoroughly, focusing on their ability to identify and prevent modern slavery.

In February 2023 we launched a new supplier relationship management platform in partnership with Kodiak Hub to enhance the transparency and efficiency of our supplier interactions. This platform allows us to maintain up-to-date supplier data and conduct comprehensive assessments of environment and social practices, including strict evaluations of labour and human rights. By the end of the first year, we assessed 60% of our contracted spend through this platform, setting a new benchmark for accountability.

We are committed to continuous improvement in our supply chain practices. We perform rigorous screening processes, on a risk-informed basis, for new suppliers, and these assessments are reviewed annually. This regular review process helps us benchmark performance and target incremental improvements in key risk areas. Suppliers showing a lack of progress or failing to meet our standards face potential termination of their contracts.

## Future initiatives

As part of our Group sustainability strategy, we plan to implement the following initiatives

over the next 12 months to manage modern slavery risk within our organisation and across our supply chain:

- We will launch a comprehensive modern slavery policy and response plan. This will outline key risk factors, provide clear guidance on the internal mechanisms available for employees to raise concerns, and ensure swift action and support.
- We will perform an annual modern slavery risk assessment which will be reported to our risk committee, highlighting potential hotspots and monitoring efforts, and informing strategic decisions.
- We will develop specific training programmes for procurement personnel and managers involved in procurement decisions for goods and services at heightened risk of modern slavery in the extended supply chain.
- We will introduce a supplier code that explicitly documents our expectations regarding modern slavery, alongside other legal and ethical considerations, to ensure all suppliers adhere to our standards.
- We will extend our existing supplier screening checks and perform annual reviews to track progress among our suppliers.
- We will develop a framework for vendor selection in sectors identified as higher risk. This will help mitigate modern slavery risks in our extended supply chain, promoting more sustainable and ethical sourcing practices.