

# **Modern Slavery Statement**

## **Modern Slavery Act Transparency Statement 2024**

### **Background**

ITN (Independent Television News Limited) continues to recognise our legal and moral obligations to comply with the UK's Modern Slavery Act and we are dedicated to running our operations in a socially responsible manner. The Act defines modern slavery as "slavery, servitude, and forced or compulsory labour" as well as "human trafficking". We are committed to ensuring that modern slavery in any form has no place in or in connection with our organisation and are pleased to reinforce that commitment through this statement. We believe that a structured and controlled approach to managing our workforce and supply chain is paramount in ensuring we can continue to be one of the leading production companies in the UK and around the world. We comply with all applicable employment legislation relating to the engagement of staff, including pay and conditions, and we invest heavily in supporting the health and wellbeing of our staff.

This statement endorses the United Nations Guiding Principles on Business and Human Rights and supports the principles contained within the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

### **Business structure, operations, and supply chain**

ITN is the UK's biggest independent producer of commercial news programming, producing the award-winning ITV News, Channel 4 News and 5 News output. Our production division, ITN Commercial Productions, produces television programmes, films, sports content and corporate programming. Supporting these functions are technical support, human resources, finance, communications, and legal teams. ITN has a range of engagement relationships with its workforce from office-based staff and newsgathering teams through to freelancers and part-time stringers based on where stories are breaking around the world. Due to the nature of its work, ITN operates on a global platform with a dynamic workforce.

ITN will partner with suppliers that adopt the same strict standards that we do. We expect our suppliers to operate fair and ethical workplaces and practices, where workers are treated with dignity and respect, and the highest standards of human rights are upheld.

We expect our suppliers to engage with us constructively and responsibly, and to demonstrate their willingness to address modern slavery-related issues in a timely manner, should such an issue arise. ITN will refuse to partner with suppliers and other stakeholders that do not achieve or are unable to demonstrate progress towards the eradication of modern slavery within their organisations and/or supply chains.

### **ITN Modern Slavery Policy**

Our Modern Slavery policy specifies the actions we are taking to eliminate risk of modern slavery and human trafficking occurring in our operations and supply chains. It applies to all ITN employees and freelancers. We also expect our suppliers to abide by this policy, as referenced in our standard conditions of contract. Our policy is that we will:

- Prevent and mitigate instances of modern slavery which are linked to our business operations and supply chain.
- Identify, understand, and promote awareness of modern slavery risks and issues pertinent to our field of operations.
- Robustly address any instances of modern slavery which we find that our business operations have contributed towards.
- Comply with the UK's Modern Slavery Act 2015, including by fulfilling our compliance obligations in publishing a 'Modern Slavery Act Transparency Statement'.

ITN's Modern Slavery policy complements our policies on Grievance, Diversity and Equality and Fairness and Dignity.

### **Grievance and Reporting**

ITN encourages honest and open communication with all our stakeholders, including those working for us or for our suppliers and those impacted by our operations.

Our whistleblowing arrangements can be used for the disclosure of suspicions relating to instances of modern slavery, thereby encouraging its reporting and prevention in any part of our business and supply chain. If anyone suspects or knows of any modern slavery-related activity, we urge that individual to report it immediately either to their line manager, or anonymously via our online web portal or whistleblowing helpline. These services are available for use by all employees to report any instance of unethical behaviour or any suspected instances of modern slavery.

If we become aware of a case of modern slavery occurring within our operations or supply chain, we are committed to investigating the cause of the violation so that we can take appropriate steps to eliminate this contravention and prevent a reoccurrence. In any such case, we would prioritise the response that produces the safest outcome for any potential victims.

## **Risk Assessment**

ITN has developed a risk-based approach to assess the likelihood of the existence of modern slavery within our supply chain.

Our risk assessment procedures have been in place since 2017 and in the first instance included a review of the largest (in terms of spend) tier 1 suppliers to ITN's core operations.

Since then, we improved and expanded the initial risk assessments and extended it to all tier 1 and tier 2 suppliers. In 2021, a range of indicators used were combined into an overall modern slavery risk score for each of our suppliers – and we actively reviewed the highest risk by geographical location and industry sector.

In 2023, we migrated to a new Finance System, which gives us the ability to implement a New Supplier onboarding process that will allow us to enhance our engagement with Suppliers around our Modern Slavery Policy and enable a review of new Suppliers to understand where the Modern Slavery Risks exist. Work is ongoing to implement this.

## **Our due diligence processes.**

We periodically review the modern slavery policies of our high-risk suppliers. We will issue the Modern slavery Supplier Questionnaire to new higher risk Suppliers and engage and review these appropriately. If requested, our Suppliers will be required to provide data to support ITN's Modern Slavery programme.

### **Key Performance Indicators linked to modern slavery and human trafficking.**

The table below outlines our Key Performance Indicators, progress to date and our future plans.

| <b>KPI</b>                                                                                                                                                                          | <b>Progress to date</b>                                                                                                                                                                                 | <b>Future plans</b>                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Extend training to all ITN staff via an e-learning exercise to raise awareness of modern slavery and human trafficking and help staff to recognise the signs and mitigate this risk | We developed an e-learning exercise for all staff, which aims to ensure that modern slavery is widely recognised and understood throughout the business. This has been reviewed, updated, and re-issued | Continually review learning materials to ensure they are up to date and adapt to conform with changes to law and policy. Re-issue training to all ITN staff          |
| Maintain a Modern Slavery policy outlining ITN's approach to reducing the likelihood of modern slavery in its supply chain                                                          | We have developed a Modern Slavery policy which applies to all ITN employees and freelancers                                                                                                            | This policy will be reviewed and updated periodically to ensure ongoing relevance                                                                                    |
| Ensuring our supplier onboarding process includes safeguards around modern slavery risk                                                                                             | Standard supplier terms and conditions state supplier obligations to conform to our modern slavery policy and highlights our right to review/assess this compliance                                     | To implement our Modern Slavery policy into our Supplier onboarding process and integrate a review process into our Finance system. Work is ongoing to support this. |
| Maintain a due diligence process for high-risk suppliers to mitigate risk of modern slavery                                                                                         | Due diligence process enhanced as above, improving supplier risk assessment.                                                                                                                            | Send the Modern Slavery Supplier Questionnaire to new high-risk suppliers and periodically review and assess any existing higher risk suppliers.                     |

This statement has been approved by the board of directors on 20<sup>th</sup> May 2024

**Justin Smith**

Chief Financial and Operating Officer

Dated – 13/06/2024