

Modern Slavery Act Transparency Statement 2026

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 an independent content producer of commercial news, television, and other 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:

- Aim to 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 adopts a risk-based approach to managing modern slavery across its supply chain.

Our risk assessment procedures have been in place since 2017 and have developed beyond reviewing the largest suppliers in terms of spend. ITN's suppliers are subject to due diligence and a requirement to comply with the Modern Slavery Act 2015. ITN prioritises higher-risk areas by geographical location and industry sector and continues to review options to strengthen supply chain transparency and oversight.

It remains our ambition to implement a more automated, system based, supplier onboarding process. This will allow us to enhance supplier engagement with our Modern Slavery Policy and provide greater insight into our risk profile. Work has started on a review of the next tranche of system improvements to define a roll out plan.

Our due diligence processes

We will monitor higher risk suppliers and engage and review where appropriate. 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.

KPI	Progress to date	Future plans
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 risk.	Online Modern Slavery mandatory training module in place. Re-formatted and sound added to increase engagement and accessibility.	Continue to review and adapt learning materials to ensure up to date and 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.	Modern Slavery policy in place which applies to all ITN employees and freelancers.	Continue to review and update policy 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.	Continue to assess opportunities to integrate Modern Slavery policy and controls into supplier onboarding process and work towards more automation.
Maintain a due diligence process for high-risk suppliers to mitigate risk of modern slavery	Due diligence process in place with ongoing review of supplier risk assessment processes.	Continue to review new high-risk suppliers, engaging with them as appropriate, and risk assessment processes for existing high-risk suppliers.

This statement was approved by the board of directors on 8th June 2026.

Justin Smith

Chief Financial and Operating Officer

Dated – 8th June 2026