

MODERN SLAVERY STATEMENT OF TELEGRAPH MEDIA GROUP LIMITED

This statement has been published pursuant to the Modern Slavery Act 2015.

Introduction

Under the Modern Slavery Act 2015 it is a legal requirement for companies like The Telegraph to be socially responsible and protect the human rights of workers. Alongside our legal obligations, our core corporate beliefs include a respect for the rule of law, promoting liberty, enterprise and democracy. This statement sets out the action we have taken during 2022, aimed at ensuring that our corporate activities and supply chains are free from modern slavery and human trafficking.

Our business and supply chains

The Telegraph is a multi-platform media organisation employing a workforce with diverse skill sets. Its core business is publication of high-quality journalism in print and online of the following newspaper titles: The Daily Telegraph, The Sunday Telegraph, The Telegraph, and the website: www.telegraph.co.uk.

We are based in the UK and have a large global audience. Our operations include printing and distribution, building and office services, events services (these have remained predominantly virtual since COVID 19), media services, recruitment, technology, training, marketing and advertising, customer services and retail.

Policies and Processes

We strive to maintain the highest standards of conduct and ethical behaviour from our employees and our suppliers:

- **Policies:** We have a wide range of policies relating to modern slavery which we have embedded in our Staff Handbook. These make it clear what behaviour is expected of our employees in respect of modern slavery.
- **Whistleblowing:** Our whistleblowing policy encourages our employees, customers, business partners and suppliers, to report any concerns, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Business Code of Conduct:** All our Suppliers are required to comply with our “Supplier Business Code of Conduct” before they do business with us. This sets out requirements that Suppliers provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. We undertake a higher level of due diligence, if there is a higher risk of modern slavery.
- **Monitoring:** We are continually evaluating modern slavery and human trafficking risks in relation to our suppliers and to identify where there is a higher potential for modern slavery. If they arose, areas of enhanced risk would be monitored by our procurement and compliance teams.

Training and Awareness

We provide our staff with training on our modern slavery obligations and reiterate the importance of our Supplier Business Code of Conduct. We take our modern slavery obligations very seriously and will continue to monitor compliance on an on-going basis. During 2022, following our evaluation of our risks, training programmes, policies and procedures, we enhanced our internal training programme to make our modern slavery obligations clearer. We also considered the ways we looked at assurance around modern slavery and are developing an enhanced assurance process within our Procurement team.

This statement has been approved by the organisation's Board of Directors, who will review and update it annually.

A handwritten signature in black ink, appearing to read 'NHL'.

Nick Hugh
Chief Executive Officer