

Dated 15th December 2023



Modern Slavery and Human Trafficking Statement

1. Introduction

This statement covers the activities of Argonon, and its subsidiary companies as set out in Schedule 1 to this statement (collectively, "**Argonon**").

This statement sets out Argonon'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.

This statement relates to activities during the financial year 1 January 2023 to 31 December 2023 and action points for the following financial year.

As part of the television and media industries, Argonon recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Argonon 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.

Argonon's Modern Slavery Statement has now 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). It is not yet a legal requirement for Argonon to register a company statement to the register, however, Argonon wishes to be transparent and show that we are committed to taking measures to fight this issue.

2. Organisational Structure and Supply Chains

Argonon is an independent production group headquartered in London with offices and bases across the United Kingdom as well as New York, California, and Oklahoma. The group consists of several companies who produce programming for a wide range of major broadcasters in the UK, Europe and USA.

3. Countries of Operation and Supply

Argonon currently has companies in the following countries:

- United Kingdom;
- Canada; and
- United States of America.

Due to the nature of Argonon's work, operations can extend into countries across the globe during the making of television productions.

The following is the process by which Argonon assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Overall risk assessment of Argonon'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.
- Each broadcaster also requires production companies under commission to comply with the broadcaster's corporate policies and due diligence procedures, which will include compliance with Modern Slavery legislation.
- Finance staff in collaboration with production management adhere to internal due diligence procedures when engaging suppliers which includes checking the standing of companies in both domestic and foreign jurisdictions and taking industry references, where possible and deemed necessary.

- Any concerns about a supplier are escalated to the senior management team of the relevant subsidiary company and to Argonon's central legal and senior management teams where necessary.
- Due diligence checks are being completed on overseas fixers who are selected by a process whereby productions obtain recommendations from employees, film commissions and/or other industry partners. Where possible, references are checked and desktop searches about the individual fixer are undertaken.

Overall Responsible Person for Policy:

Laura Bessell, Chief Operating Officer: Laura.Bessell@argonon.com

Key Nominated Senior Management

For the following Argonon Companies, the main contact outside of your line manager is as follows:

Argonon Central:	Jenny King, Head of HR and Amanda Goddard, Director of Legal and Business Affairs
Argonon USA Ltd & Leopard USA Ltd:	Steve McGovern, Chief Operating Officer
Argonon USA Ltd & Rose Rock Entertainment LLC:	Joe Weinstock, Chief Executive Officer
Bandicoot Productions Ltd:	Derek McLean, Managing Director & Daniel Nettleton, Creative Director
Bandicoot Scotland Ltd:	Derek McLean, Managing Director & Daniel Nettleton, Creative Director
BriteSpark East Ltd:	Tom Porter, Director of Programmes and MD
BriteSpark Ltd:	Nick Godwin, Creative Director
Leopard Pictures Ltd:	Kristian Smith, Managing Director
Like a Shot West Ltd:	Henry Scott, Managing Director
Windfall Films Ltd/Studio Leo Ltd:	Allison Todd, Managing Director

The following are Argonon departments and the current communication tree under this Policy:

CEO: James.Burstall@argonon.com

COO: Laura.Bessell@argonon.com

Director of Communications: Rich.Turner@argonon.com

Director of Finance: Matthew.Richardson@argonon.com

Director of Legal and Commercial Affairs: Amanda.Goddard@argonon.com

Director of Technology: Karl.Dawkins@argonon.com

Head of HR: Jenny.King@argonon.com

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.
- **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:** Argonon has a training policy in place and actively encourages staff to request training opportunities. Argonon will be reviewing its policy in 2024 and implementing training designed to ensure staff better understand and respond to slavery and human trafficking risks.

6. [Relevant Policies and Contractual Obligations](#)

Argonon 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 and Speaking Up Policy:** Argonon 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. Argonon'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:** Argonon's contracts with staff and suppliers contain obligations to ensure that their actions and behaviour are appropriate and adhere to all company policies and procedures. Argonon strives to maintain the highest standards of employee conduct and ethical behaviour within its operations and its supply chain.
- **Policy on Basic Pay and Work Experience Policy:** These policies are designed to ensure that Argonon undertakes rigorous recruitment processes, ensuring that all members of staff are paid at an appropriate level for the work that they provide including strict adherence to the National Minimum Wage ("NMW"). Information on Argonon's recruitment process is set out in the Recruitment Privacy Policy and the Equal Opportunities, Diversity, and Inclusion Policy
- **Argonon is an accredited Living Wage Employer:** This means that everyone employed/engaged through PAYE, Schedule D or through a Personal Service Company is paid a wage that is over and above the NMW. The Real Living Wage is independently calculated based on what people need to get by and is higher than the NMW set by the Government.

7. [Due Diligence](#)

Argonon undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Following a risk assessment of Argonon'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. [Performance Indicators](#)

The organisation has reviewed its key performance indicators ("KPIs"). As a result, the organisation is:

1. requesting all production managers, the subsidiary companies' Head of Productions, all other relevant production staff and relevant central Argonon staff complete training on modern slavery by 31 December 2023;
2. going to produce internal guidance on supply chain verification, to support production units with the evaluation of potential suppliers before they enter the organisation's supply chain; and
3. ensuring all new suppliers who operate in high-risk countries (as determined by reference to the Global Slavery Index [here](#)) are obligated by virtue of agreeing to Argonon's supplier agreements to warrant that the supplier does not engage in modern slavery and has processes in place to prevent modern slavery and human trafficking in its supply chains.

9. [Training](#)

Key members of staff were trained in 2021, 2022 and 2023. As noted above, the company will be reviewing its training policy in 2024 and will examine who needs to undertake training and determining what type of training is most appropriate depending on individual roles and responsibilities. We'd expect all relevant staff working in high-risk countries and in relevant Argonon central roles to complete an internal training course during the onboarding process.

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;
- what external help is available;
- how to contract with suppliers to ensure the supplier is obliged to prevent modern slavery and human trafficking within its operations; and
- what steps Argonon should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Argonon's supply chains.

10. Awareness-Raising Programme

As well as training staff, Argonon will work 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.

11. Board approval

This statement was approved on 15th December 2023 by the organisation's board of directors, who review and update it annually.

Director's signature:

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Director's name:

Laura Besse11

Date:

18 December 2023

SCHEDULE 1
LIST OF ALL COMPANIES IN THE ARGONON GROUP

- Argonon International Limited
- Argonon Ltd
- Argonon Media Ltd
- Argonon USA Ltd
- Bandicoot Productions Limited
- Bandicoot Scotland Limited
- BriteSpark Films Limited
- BriteSpark East Limited
- Cascade Productions Ltd
- DNA Productions Limited
- Leopard Films Limited
- Leopard Pictures Ltd
- Leopard Pictures (WG) Limited
- Leopard Pictures (Family) Ltd
- Leopard Pictures (HC) Limited
- Leopard Pictures (AT) Ltd
- Leopard USA Ltd
- Like A Shot Entertainment Limited
- Remedy Productions Limited
- Rose Rock Entertainment LLC
- Studio Leo Limited
- Transparent Television Limited
- Windfall Films Limited
- Windfall Newco Limited
- Windfall Adventure Limited
- Windfall Films (Science) Ltd
- Windfall Films (Nature) Limited