

## **Slavery and Human Trafficking Statement of The Scott Trust Limited (the “Scott Trust”) and Guardian Media Group plc (“GMG”) for the year ended 3<sup>rd</sup> April 2022**

This statement is made pursuant to the Modern Slavery Act 2015 (the “MSA”). It sets out what the Scott Trust and GMG have in place to ensure that slavery and human trafficking is not taking place in supply chains or in any part of the business.

### ***Organisational structure, business and supply chains***

The Scott Trust’s core purpose is to secure the financial and editorial independence of the Guardian in perpetuity, with subsidiary aims to champion its principles and to promote freedom of the press in the UK and elsewhere. The Scott Trust wholly owns Guardian Media Group plc, the core business of which is Guardian News & Media Limited (“GNM”), publisher of theguardian.com and the Guardian and Observer newspapers.

The Guardian produces high-quality journalism, funded through a combination of contributions, memberships, subscriptions and advertising. The journalism has a global reach with offices in the UK, Australia and the US.

GNM procure many different services from a variety of suppliers. The supply chains currently relate mainly to the following activities: printing and publishing; distribution of print products; retail products; events services; building services; IT infrastructure and transport; recruitment and training; customer services; and marketing and advertising.

### ***Policies in relation to slavery and human trafficking***

The organisation works to minimise the risk of modern slavery and human rights violations across the entire operation and supply chains. Through the BCorp assessment (GNM achieved BCorp status in October 2019), GNM indicated how it assessed the standards practised by suppliers and are required to declare that significant suppliers do not have practises or outcomes that produced and/or produce substantial negative impacts regarding human rights, labour conditions or local communities.

The organisation has a history of engaging with human rights issues more broadly, which frames the activity around reducing the risk of slavery and human trafficking. GNM has in place a set of [Guardian Sourcing Values](#) in recognition of the fact that it relies on suppliers and partners and does not always have direct control over its impact on the environment and people. The Guardian Sourcing Values incorporate the findings of a consultation within the business on international standards and guidelines, such as the International Labour Organisation eight fundamental conventions, United Nations Global Compact 10 principles and the UN Guiding Principles on Business and Human Rights.

The Guardian Sourcing Values provide the framework against which an ethical assessment of GNM’s suppliers are measured. GNM require suppliers to comply with applicable legislation and regulations and be aware of the key risks to human rights in their operations and supply chains, including the MSA.

GNM is committed to ensuring that all employees are paid fairly and to support this it has been a Living Wage Accredited Employer for a number of years. The company has in place a company minimum salary, in excess of the Living Wage, thereby reinforcing this commitment. The minimum salary is reviewed on an annual basis. Furthermore, GNM has a strong relationship with recognised unions, the National Union of Journalists and Unite. Additionally, there are a number of employee forums that provide a platform for employees to raise any concerns on matters relating to pay and the working environment more generally. The combined effect of GNM’s commitment, reinforced with a strong governance framework, helps ensure that modern slavery is not occurring in the operations.

### ***Due diligence processes***

GNM and its suppliers are expected to live up to and adhere to the principles of the Guardian Sourcing Values.

Procurement processes take into account the potential risk factors of different types of suppliers and where appropriate, new suppliers go through the ethical assessment process, to evaluate risk, verify suppliers, including in relation to human rights and modern slavery. The ethical due diligence process relates to purchasing across all offices where the goods and services touch on the activities of the UK business.

Where appropriate, contract signatories are informed that modern slavery must be considered before signing any supplier terms and conditions, whether in the higher risk categories or otherwise.

### ***Risk assessment and management***

Categories and services that may be of a higher risk of modern slavery have been identified based on a calculated risk assessment. This includes environmental, social and governance risk mapping, taking into account factors such as the complexity of the employment relationship and profiling of the type of work undertaken.

The process involves engaging with the suppliers in these higher risk categories, including but not limited to, highlighting relevant sections of the code with the relevant supplier. During the period, 39 new potential suppliers for GNM were identified in the high risk categories. These were all assessed and with the exception of one, these were not found to be a concern. The one potential supplier that did not meet GNM's standards was rejected.

In addition to the potential new suppliers, we also re-assessed 11 of GNM's current suppliers. None of these raised any concerns. During 2022/23 GNM plans to continue to re-assess as many of GNM's current high risk category suppliers as possible.

Supplier terms and conditions require suppliers to comply with the MSA, thereby reducing the risk of modern slavery and human trafficking in the supply chain. In the case of high risk suppliers the contracts include audit and termination rights to enable more effective monitoring of those suppliers and to enable us to take the relevant action.

Policies are in place to ensure that responsibilities are met to respect and protect human rights, including in relation to modern slavery, including policies covering: economic governance; access to information; engagement with young people; safety security and wellbeing; access to grievance and remedies; discrimination; protection of the environment; and human rights.

### ***Effectiveness in ensuring that slavery and human trafficking is not taking place***

No evidence has been found of practices that violate the Guardian Sourcing Values within our current suppliers, including the values that relate to slavery and human trafficking. To date, no supplier questionnaires as part of the due diligence questionnaire for new suppliers has raised material concerns. Modern slavery provisions continue to be included in contracts where applicable.

BCorp certification will be reassessed every three years, requiring GNM to supply evidence of applicable policies and processes relating to (among other things) employee rights, supply chains and environmental impact. GNM is expected to undertake its next BCorp certification in 2022.

Principles are in place to assist decision-making in the event of a breach of standards, for example a requirement to address any breach immediately.

### ***Training***

GNM has a procurement team which has been trained to assess the risks of modern slavery throughout the tender processes, contract renewals and at the point of new supplier approvals.

This statement is made pursuant to section 54(1) of the MSA and constitutes the Scott Trust and GMG's slavery and human trafficking statement for the financial year ending 3<sup>rd</sup> April 2022.

Approved by the Board of Directors on 6<sup>th</sup> July 2022.

Keith Underwood

Interim Chief Executive Officer

Date: 6 July 2022