

## NLA MEDIA ACCESS LIMITED

### ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

NLA media access has fostered and continues to foster an organisational culture that respects dignity and human rights.

NLA is committed to ethical trading, sourcing and procurement. Ethical sourcing and procurement refers to processes which respect fundamental international standards against criminal conduct and human rights abuse and respond immediately to such matters where they are identified with the aim of resulting in progressive improvements to the lives of people who contribute to supply chains and are impacted by supply chain decisions. NLA's commitment to respect human rights is guided by the United Nations Universal Declaration of Human Rights.

Modern slavery and human trafficking are gross violations of fundamental human rights. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

#### WHAT IS MODERN SLAVERY?

**Slavery** - in accordance with the UK's Modern Slavery Act 2015, and the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Modern slavery takes various forms all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain including:

**Forced labour** - is defined in the Modern Slavery Act 2015 and in international law by the ILO's Forced Labour Convention 29 and 2014 Protocol. It involves coercion, whether by direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily;

**Debt bondage** - victims are forced to work to pay off debts that realistically they will never be able to fulfill. Low wages and increased debts mean not only that they cannot ever hope to pay off the loan, but the debt may be passed down to their children;

**Sexual exploitation** - Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Whilst women and children make up the majority of victims, men can also be affected. Adults are coerced often under the threat of force, or another penalty;

**Criminal exploitation** - Victims are forced into crimes such as cannabis cultivation or pick pocketing against their will;

**Domestic servitude** - Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work;

**Human trafficking** is the arrangement or facilitation of the travel of another person, either across borders or within a single country, with a view to that person's sexual or non-sexual exploitation.

#### SCOPE OF POLICY

The scope of this policy is company-wide and sets out NLA's commitment to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **TRANSPARENCY IN OUR GLOBAL SUPPLY CHAIN**

NLA is committed to ensuring that we adequately report our progress in eradicating anti-slavery and human trafficking according to suitable benchmarks and frameworks, which we will continue to keep under review.

As a supplier of goods and services in the UK, NLA has an obligation under the Modern Slavery Act 2015 to publish an annual statement setting out the steps which the Company has taken during the financial year to ensure that slavery or human trafficking is not taking place in any of our supply chains or in any part of our business, or a statement that we have taken no such steps.

This is a developing area and the Company's approach will evolve over time. However, we envisage that some of the steps which the Company will take to ensure that our global supply chain is free from slavery and human trafficking will include monitoring and reviewing procurement processes and supplier contracts to ensure that suppliers are required to comply with appropriate standards relating to the use of labour, as well as proactive supplier risk management. We are also introducing training for our employees and management who have direct responsibility for supply chain management, particularly with respect to mitigating risks within the supply chain, and as part of our procurement process and supplier review, we will engage in an exercise to map our supply chains, and in doing so identify any salient risks which they may contain.

The annual statement will be approved by the Board of Directors and signed by a director authorised by the Board of Directors and will be published on the Company's website at <http://www.nlamediaaccess.com>.

## **REPORTING OBLIGATIONS**

We are committed to investigating and addressing concerns relating to modern slavery and human trafficking which are raised over and above our own due diligence and anti-slavery risk assessments. Staff are expected to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery or human trafficking of whatever form is, or may be, taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

## **WHAT ACTION WILL NLA TAKE IF A VIOLATION OF THIS POLICY IS IDENTIFIED?**

The action which the Company will take will vary, depending on the nature and severity of the impact which has been identified either through our own due diligence, or due to a complaint, campaign or protest action. Verification of the allegations or human rights issue, and the given facts in the case, are a critical starting point and may require independent investigation and, where the issues and claims are complex, access to expert advice.

If a direct cause or connection to NLA's business can be shown, then any follow-up remedial action will depend on the degree of influence that NLA has over the situation and its relationship to the affected party/ies. Some situations may require co-operation or engagement with government agencies, judicial authorities or non-government bodies. In some cases existing operational-level grievance mechanisms will be sufficient to resolve an issue.

If, following support and guidance to remediate any issue which is identified, any contractor, subcontractor, supplier, or vendor violates this policy, or wilfully, knowingly or negligently allows subordinates to do the same, NLA will reconsider its commercial relationship with that organisation, which may lead to the termination of contracts or other sanctions. Violations, or suspected violations, will be reported to law enforcement agencies where appropriate.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

## **GOVERNANCE AND RESPONSIBILITY**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The General Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **COMMUNICATION AND AWARENESS OF THIS POLICY**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our approach to modern slavery and human trafficking must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

NLA Media Access Limited  
19 February 2019