

THE MODERN SLAVERY COMPLIANCE STATEMENT

NLA MEDIA ACCESS STATEMENT

This statement is made pursuant to the section 54(1) of the Modern Slavery Act 2015 and constitutes NLA's slavery and human trafficking statement for the financial year ending 31 December 2019.

1. Introduction

NLA media access Limited ('NLA') is committed to ethical trading, sourcing and procurement, and to improving our practices to combat slavery and human trafficking. NLA has fostered and continues to foster an organisational culture that respects dignity and human rights.

2. NLA Organisational Structure

NLA is a private limited company registered in the UK. NLA offices are based in London and Tunbridge Wells.

NLA is a 'licensing body' (defined in s.116(2) of the Copyright Patents and Designs Act 1988) owned by publishers. As a licensing body, NLA is authorised by represented publishers to issue licences to allow copying from their publications and websites – please see our website www.nlamediaaccess.com for full details of the NLA and licences that we offer.

The primary functions of NLA are:

- as a collective rights management organisation representing news and magazine publishers, the issuing of licences to organisations for the copying of cuttings from publishers' publications and websites;
- the operation of a database which primary function is to provide media monitoring organisations and their clients with access to copies of cuttings from selected newspapers, magazines and websites.

NLA licenses and provides content from its database to organisations throughout the world but the majority of NLA's business is conducted in the UK.

Due to the nature of our business, NLA assesses its business as very low risk as regards slavery and human trafficking. However, we aim to periodically review the effectiveness of the relevant policies and procedures that we have in place.

3. NLA Supply Chains and Due Diligence Processes

NLA policy is to act ethically and with integrity in all our business relationships, to only deal with suppliers that have a proven reputation, including their adherence to the principles of ethical treatment, and whose policies are in line with the NLA's '[Anti-Slavery and Human Trafficking Policy](#)'. 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.

a. Licensing Activities

NLA's licensing activities are office based and the main communication is direct with clients on the telephone and via email. The suppliers that NLA engages with for its licensing activities are limited to office and computer maintenance and support.

b. Database Activities

The most significant supply relationships in NLA's business are in its database activities, where NLA outsources the processing of pdf content from newspapers and magazines and its IaaS functions. NLA has long standing relationships and keeps close contact with its principal service providers, including annual site visits in order to understand the businesses' operating context.

NLA will continue to update its principal supplier agreements to include a specific undertaking as regards slavery and human trafficking at the first available opportunity.

4. NLA Policies

NLA is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our [‘Anti-Slavery and Human Trafficking Policy’](#) reflects our commitment to act ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Equal opportunity policy;
- Whistleblowing policy;
- Health & Safety policy.

5. Staff Training

NLA’s general policy is to provide training appropriate to the role and function of each employee in the business. NLA has taken steps to ensure staff are made aware of its general policy as regards slavery and human trafficking, in particular for those staff dealing with third party suppliers. NLA provides an environment where staff are encouraged to report any suspicions of unethical behaviour.

This statement is approved on 19 March 2020 by the Board of Directors of NLA Media Access Limited.

Signed on behalf of NLA by:

A handwritten signature in black ink, appearing to read 'H Jones', with a long horizontal flourish extending to the right.

Henry Jones

Managing Director

19 March 2020