

## **NLA MEDIA ACCESS LIMITED**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made pursuant to 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 2023.

#### **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 in our business and supply chain. NLA has fostered, and continues to foster, an organisational culture that respects dignity and the human rights of all.

#### **2. NLA Organisational Structure**

NLA is a private limited company registered in the UK with company number 03003569. NLA's office is based in Tunbridge Wells, Kent.

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](http://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; and
- 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 regularly review the effectiveness of the relevant policies and procedures that we have in place.

#### **3. NLA Supply Chains and Due Diligence Processes**

NLA's policy is to act ethically and with integrity in all our business relationships and we have zero tolerance to slavery and human trafficking. We only deal with suppliers that are reputable, adhere to the principles of ethical treatment and whose policies are in line with, amongst others, the NLA's '[Anti-Slavery and Human Trafficking Policy](#)'. Our approach to modern slavery and human trafficking is 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 Infrastructure as a Service functions. NLA has long standing relationships, and keeps close contact, with its principal service providers, undertaking annual site visits in order to understand the businesses' operating context.

NLA continues to ensure that its principal supplier agreements include a specific undertaking with regard to slavery and human trafficking.

4. NLA Policies

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 are 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 our:

- Equal opportunity policy;
- Whistleblowing policy; and
- Health & safety policy.

We continuously review and update all our policies.

5. Staff Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, 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.

6. Our effectiveness in combating slavery and human trafficking

NLA is committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business and continues to review the effectiveness of the steps we take to prevent and combat this. Some of the steps we have taken to ensure that our global supply chain is free from slavery and human trafficking this financial year 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;
- as part of our procurement process and supplier review, engaging in an exercise to map our supply chains, and in doing so identify any salient risks which they may contain; and
- ensuring 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 is committed to ensuring that we adequately report our progress in eradicating slavery and human trafficking according to suitable benchmarks and frameworks, which we will continue to keep under review.

This statement was approved on 21 March 2024 by the Board of Directors of NLA Media Access Limited.