

## **Modern Slavery Policy**

This policy sets out Banijay UK's policy on combatting forced labour within our company and in our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

This policy, together with our Code of Conduct and Bribery Prevention Policy, forms part of our wider commitment to encourage ethical, social and environmental responsibility.

We oppose the use and exploitation of forced labour and we expect all those who work for us or on our behalf to share our zero-tolerance approach.

This policy applies to all those who work for us and those who work on our behalf, including employees, agency workers, casual and freelance staff.

### **Why combatting forced labour matters:**

1. Forced labour is a global problem. It affects over 20 million people around the world. Taking steps to tackle forced labour protects vulnerable workers and helps prevent human rights violations.
2. We do not tolerate forced labour within our company. Eradicating forced labour is consistent with our ethical principles and our commitment to ensuring a high standard of ethical employment practices, including the protection of workers' rights within our supply chain.

### **Our responsibilities:**

3. The Banijay UK board is responsible for ensuring that this policy and our annual slavery and human trafficking statement (see below) comply with our legal and ethical duties.
4. Banijay UK's Director of Operations has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, answering queries on it and auditing internal processes aimed at ensuring that forced labour is not taking place within our company or supply chain.
5. The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organisation has taken to ensure that slavery and human trafficking is not taking place in its supply chain or its company. Our statement is published on the home page of our website and should be read in conjunction with this policy.

### **What we are doing:**

6. We are confident that we employ no forced labour directly within our company. However, our aim is to ensure that we review this annually and to assess the contractors and suppliers within our supply chain for areas of risk and, if a risk is identified, take appropriate steps to address it.
7. We have taken the following steps to prevent, evaluate and address risks of forced labour in our supply chain:
  - (a) We have established a Supplier Code of Conduct (see Annex A) with which we expect our contractors and suppliers to comply. We may impose contractual obligations requiring compliance;

(b) We shall consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the contractor / supplier.

(c) We shall train our employees on issues around forced labour and the Supplier Code of Conduct to ensure a company-wide awareness of this policy and our legal and ethical responsibilities.

**Employee responsibilities:**

8. Managers are responsible for ensuring that this policy is applied within their area of responsibility.

9. Our employees are expected to be alert to any indicators of forced labour in our company or supplier chain.

10. We do not tolerate any forced labour within our company. If you suspect that there has been a breach of this policy or if you have any concerns regarding the issue of forced labour in any part of our company or our supplier chain, you should notify your manager/senior management or report it in accordance with our Whistleblowing policy as soon as possible.

**Monitoring our effectiveness**

11. We will review this policy to ensure that it is operating effectively. Where concerns have been raised through this policy, we will consider how they have been handled and whether appropriate follow up action has been taken.

**Further Information for Producers**

12. Sky have produced some useful guidance on addressing modern slavery risks in production.

You can find a link to download this on their website. Click the following link <https://static.skyassets.com/contentstack/assets/bltdc2476c7b6b194dd/blt21452d198e470c0b/5a58a65d1c8c426f0be54711/Sky%20Guidance%20for%20IPCs%20on%20Modern%20Slavery%20-%2012th%20Jan.pdf>

**Status of this policy**

13. This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by the company at any time.

### **Modern slavery statement for financial year ending 31 December 2021**

Banijay UK condemns slavery, human trafficking and forced labour either within our company itself or within our supply chain as it is an abuse of human rights. We expect individuals and entities within our supply chain (whether direct contractors/suppliers or those who directly or indirectly supply our direct suppliers) to share the same values.

We are committed to seeking, implementing and maintaining procedures to prevent (where possible) human rights violations from occurring in connection with our business.

We have taken the following steps to assess and manage any risk that our supply chain may use forced labour:

- We have adopted a Modern Slavery and Human Trafficking Policy which rejects the use of forced labour,
- We have communicated the policy to our employees and shall continue to increase awareness among our employees of issues related to slavery, human trafficking and forced labour.

We may impose contractual obligations on suppliers under which they:

- undertake to comply with our Supplier Code of Conduct;
- warrant that neither their own business nor, to the best of their knowledge, their supply chain uses forced labour;
- agree to impose equivalent obligations on their own suppliers.

We have prepared this statement for the purposes of the Modern Slavery Act 2015. References in the statement to “forced labour” mean any conduct which is an offence under Part I of that Act including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation or any conduct that would constitute an offence under the Modern Slavery Act 2015 if it were in force in the jurisdiction where the conduct took place.

This statement has been approved and will be reviewed annually.

Lucinda Hicks

Chief Executive Officer, Banijay UK

## **ANNEX A**

### **SUPPLIER CODE OF CONDUCT - FORCED LABOUR**

Banijay UK opposes the use and exploitation of forced labour. We expect all those who work for us or on our behalf to share our zero-tolerance approach.

References in this Code to “forced labour” include slavery, servitude and any type of forced or compulsory labour as well as trafficking for the purposes of exploitation or any conduct that constitutes an offence under the Modern Slavery Act 2015 or would constitute an offence under the Modern Slavery Act 2015 if it were in force in the jurisdiction where the conduct took place.

Accordingly, our expectations of contractor/suppliers are as follows:

1. Contractors and Suppliers must not use forced labour.
2. If requested by us, contractors/suppliers will complete and deliver a self-assessment questionnaire provided by us regarding the use of forced labour and the steps they have taken to ensure that it is excluded from their supply chain. Contractors/suppliers will provide us with a copy of the completed questionnaire.
3. Contractors/suppliers will allow us to audit their compliance with this Code by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Contractors/suppliers are expected to provide prompt access to their facilities, records, documentation and personnel.
4. If we identify any non-compliance, contractors/suppliers must prepare, permit us to review and execute an improvement plan approved by us to rectify matters.
5. Contractors and Suppliers must immediately notify us of any legal proceedings or actions where any of its employees, agents or other people performing services under the contract with us is investigated by any law enforcement agency in relation to Modern Slavery.
6. Contractors/suppliers will place similar expectations to those set out above on their own suppliers.

We may require compliance with this Code in our contracts with contractors/suppliers and may also require that they impose equivalent obligations on their own suppliers.

Subject to any contractual terms, we may terminate our supply relationship if a contractor/ supplier fails to comply with this Code. If appropriate, we may report any breach of this Code to the appropriate authorities.

If you have any concerns or are aware of any suspected violations of this Code, please notify Bella Lambourne, HR and Operations Director at Banijay UK, and the Legal Department of the relevant operating company immediately.