

## Introduction

This statement sets out Zinc Media Group plc and its subsidiaries ('The Company') actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1<sup>st</sup> June 2017 to 30<sup>th</sup> July 2018.

As part of the TV Production sector we recognise that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Our Company

This statement covers the activities of Zinc Media Group PLC and its subsidiaries ('The Company').

We are a cross platform media agency, targeting content across multiple channels and sectors to capture a marketplace and its customers. We bring insight and clever strategic thought together with compelling ideas and stories, combining these with top creative and technical skills.

Our divisions offer a fully integrated service when it comes to content creation for television production and digital communications.

## Countries of operation and supply

The Company currently operates in the UK only, our operations are:

- TV production
- Digital communications
- Publishing

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

## Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows [select the relevant areas from the list below]:

- **Policies:** The HR Manager, and reviewed by the Directors.
- **Risk assessments:** The HR Manager and the Directors will analyse any risks associated with human rights and modern slavery.
- **Investigations/due diligence:** The HR Manager and the Directors are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** We require all staff to watch the Governments **Modern Slavery is Closer Than You Think** video to provide them with an awareness of modern slavery. All Employees are also provided with **Modern Slavery: A briefing document**.

## Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Anti-slavery policy.** This policy sets out the Company's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- **Code of business conduct.** This code explains the way we behave as a Company and how we expect our employees and suppliers to act.

### Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

- The Company's due diligence and reviews include:
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

### Performance indicators

We have reviewed our key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, we will introduce and monitor the following KPI:

- Instances of breaches of Modern Slavery Act = zero.

The Company has taken the following steps to ensure we have a zero result of breaches of the Modern Slavery Act 2015 by raising awareness of modern slavery issues through distribution of the **Modern Slavery: A briefing document** to employees, putting up posters across the Company's premises and circulating the **'Modern Slavery is Closer Than You Think'** video.

The posters, leaflet and video explain to employees the basic principles of the Modern Slavery Act 2015;

- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company; and
- what external help is available, for example through the Modern Slavery Helpline.

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Board approval**

This statement has been approved by the Company's Chief Finance Officer whom along with the HR Manager will review and update it annually.

**David Galan**  
**Chief Finance Officer**