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**The Telegraph**

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This statement has been published pursuant to the Modern Slavery Act 2015.

## Introduction

The Modern Slavery Act 2015 made it a legal requirement for companies like The Telegraph to be socially responsible and protect the human rights of workers. Alongside our legal obligations, our core corporate beliefs include a respect for the rule of law, promoting liberty, enterprise and democracy. To adhere to these beliefs and the law, we must take responsibility for individuals that work with and for us. This statement sets out the action we have taken during 2018, aimed at ensuring that our corporate activities and supply chains are free from modern slavery and human trafficking.

## Our business and supply chains

The Telegraph is a multi-platform media organisation employing a workforce with diverse skill sets. Its core business is publication of high-quality journalism in print and online of the following newspaper titles: The Daily Telegraph, The Sunday Telegraph and The Telegraph, a weekly world edition and the website: www.telegraph.co.uk.

We are based in the UK and have a large global audience. Our operations include printing and distribution, building and office services, events services, media services, recruitment, technology, training, marketing and advertising, customer services and retail.

## Policies and Processes

We strive to maintain the highest standards of conduct and ethical behaviour from our employees and our suppliers:

- **Policies:** We have a wide range of policies relating to modern slavery which we have embedded in our Staff Handbook. These make it clear what behaviour is expected of our employees in respect of modern slavery.
- **Whistleblowing:** Our whistleblowing policy encourages our employees, customers, business partners and suppliers, to report any concerns, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Due Diligence:** Suppliers must complete our due diligence process, including agreeing to our “Supplier Business Code of Conduct” before they do business with us. This sets out our requirements that Suppliers provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We undertake a higher level of due diligence, if there is a higher risk of modern slavery.
- **Monitoring:** We are continually evaluating modern slavery and human trafficking risks for our suppliers and have identified those where there is a higher potential for modern slavery. The areas of enhanced risk are monitored by our procurement and compliance teams. We are establishing a procedure of writing to higher risk suppliers on an annual basis to remind them of our requirements.

## Training and Awareness

We currently highlight our modern slavery obligations as part of our induction training and are looking to establish a programme which will require all staff to complete training on our responsibility to prevent modern slavery. As well as training staff, we will be raising awareness of modern slavery issues generally and reiterating to our staff the importance of our Supplier Business Code of Conduct.

This statement has been approved by the organisation’s Board of Directors, who will review and update it annually.

We know that to tackle modern slavery, and promote our core beliefs it is essential to monitor and improve our procedures on an on-going basis.



Nick Hugh

Chief Executive Officer

This statement was approved by the Board on Monday, 11th February, 2019

This statement relates to the period from 1 January 2018 – 31 December 2018

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Modern Slavery

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