

## **Slavery and Human Trafficking Statement of The Scott Trust Limited (the “Scott Trust”) for the financial year 2015-2016**

This statement is made pursuant to the Modern Slavery Act 2015 (the “MSA”). It sets out what the Scott Trust has done to ensure that slavery and human trafficking is not taking place in supply chains or in any part of the business.

### ***Organisational structure, business and supply chains***

The Scott Trust has the core purpose to secure the financial and editorial independence of the Guardian in perpetuity, with subsidiary aims to champion its principles and to promote freedom of the press in the UK and elsewhere. The Scott Trust wholly owns Guardian Media Group plc, the core business of which is Guardian News & Media Limited (“GNM”), publisher of theguardian.com and the Guardian and Observer newspapers.

We produce high-quality journalism, funded through a combination of advertising, membership, sales and sponsorship. Our journalism has a global reach and we have offices in the UK, Australia and US. The majority of printing and publishing is done in-house, and online news services include: theguardian.com website (optimised for desktop, tablet and mobile); an iOS and Android app; and, a daily iPad edition.

We procure many different services from a variety of suppliers. Our supply chains currently relate mainly to the following activities: printing and publishing; distribution of print products; retail products; events services; building services; IT, infrastructure and transport; recruitment and training; customer services; marketing and advertising.

### ***Policies in relation to slavery and human trafficking***

Our organisation works to minimise the risk of modern slavery and human rights violations across our entire operation and supply chains. GNM has a history of engaging with human rights issues more broadly, which frames our activity around reducing the risk of slavery and human trafficking. The Guardian Sourcing Values were developed in recognition of the fact that we rely on suppliers and partners, and we do not always have direct control over our impact on the environment and people. They incorporate the findings of a consultation with our business and international standards and guidelines, the United Nations Global Compact 10 principles and the UN Guiding Principles on Business and Human Rights.

The Guardian Sourcing Values provide the framework against which an ethical assessment of our suppliers will be measured, further details are set out below. They have been reviewed and updated so that they reflect the MSA and make explicit reference to the requirements to combat modern slavery. For example they state that suppliers must meet all existing international and national legislation and regulations regarding health and safety, including modern slavery. They commit us to identifying high risks areas for potential violation of

human rights abuse in their our own operation and supply chain, with particular focus on bonded, forced or slave labour.

GNM is a Living Wage Accredited Employer and has a strong relationship with unions, including Unite and the National Union of Journalists, helping us to ensure that modern slavery is not occurring in our own operations.

### ***Due diligence processes***

GNM and its suppliers are expected to live up to and adhere to the principles of the Guardian Sourcing Values and demonstrate progress towards the standards as set out for each principle.

We have added a new level of due diligence into the procurement process. It will be mandatory for all new suppliers to go through the ethical assessment process before a contract is signed, to evaluate risk and verify suppliers including in relation to human rights and modern slavery. Our ethical due diligence process relates to purchasing across all of our offices where the goods and services touch on the activities of the UK business. We have begun rolling out the ethical due diligence process to cover all procurement, including all activities in the US and Australia.

### ***Areas of risk and management***

We have identified categories and services that may be of a higher risk of modern slavery, based on a calculated risk assessment. This includes environmental, social and governance risk mapping, taking into account factors such as the complexity of the employment relationship and profiling of the type of work undertaken.

We are currently in the process of engaging with the suppliers in these higher risk categories. This will include, but is not limited to, highlighting relevant sections of the code with the relevant supplier and updating our supplier terms and conditions to require compliance with the MSA thereby reducing the risk of modern slavery and human trafficking in our supply chain. In the case of high risk suppliers the contracts will include audit and termination rights to enable more effective monitoring of those suppliers.

We have undertaken an analysis of the policies of GNM to ensure that we have adequate policies to meet our responsibilities to respect and protect human rights, including in relation to modern slavery. This reviews over 60 GNM policies covering: economic governance; access to information; engagement with young people; safety security and wellbeing; access to grievance and remedies; discrimination; protection of the environment; and human rights.

### ***Effectiveness in ensuring that slavery and human trafficking is not taking place***

We have not found any evidence of practices that violate the Guardian Sourcing Values, including the values that relate to slavery and human trafficking.

We have principles that assist decision-making in the event of a breach of standards, for example a requirement to address any breach immediately. We are currently creating a more detailed process for non-compliance.

### ***Training available to staff***

Our Guiding Principles aim to inspire our staff and suppliers to meet the high expectations set by our journalism. The Guardian Sourcing Values are online and have been promoted to employees, and now The Modern Slavery Statement and Guardian Sourcing Values will be highlighted to each employee by email.

We have held well-attended training workshops for procurement staff and for all employees at GNM. The workshops were entitled “What has modern slavery got to do with a media business?” We asked global experts in the field of ethical sourcing and human rights to help GNM staff to understand the connection between their buying actions, our values and the wider social impacts.