

## **UK MODERN SLAVERY STATEMENT 2019**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our slavery and human trafficking statement for the financial year ending **31st December 2019**. The purpose of this statement is to set out our policies and identify actions that we have taken to prevent slavery and human trafficking from taking place in our business.

### **INTRODUCTION TO OUR BUSINESS**

**UMG Supply Chain Limited** is a UK company that is part of the Universal Music Group. The principal activity of the company is the provision of the physical and digital supply chain to Universal Music Group companies.

### **STRUCTURE AND SUPPLY CHAINS**

The physical supply chain manufactures and distributes physical products including CD, DVD and vinyl. Almost all of the manufacture of physical product takes place within the European Union. The company also distributes physical product on behalf of distribution deal partners. The digital supply chain maintains a number of digital platforms used by Universal Music Group companies for the digital distribution of music. The company also provides archiving services from two sites based in the UK.

### **OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING**

UMG Supply Chain Limited fully supports the aims of the Act and is committed to carrying out its business fairly and honestly. We understand the importance of carrying out business in an ethical manner and we endeavour to constantly improve our systems and processes to ensure that we adhere to ethical business practices.

We are committed to human dignity and we respect the rights of individuals in every aspect of our work. Practices that degrade other people including discrimination, slavery, sex trafficking, forced labour child labour, unfair and unsafe working conditions, or any other form or workplace abuse have no place in our company, industry or society. As a Universal Music Group company, we endeavour to ensure that our suppliers adhere to the UMG Corporate Social Responsibility Policy, which endorses these principles. We take steps to protect human rights in our business by choosing business partners who share our commitment to human rights and by carrying out our business with fairness, honesty and integrity.

This statement reflects our commitment to acting ethically in our business relationships and our stance against any form of slavery, human trafficking, child labour or other human rights violations. These standards are reflected by commitments including:

- not using any form (nor contracting with suppliers using any form) of forced, bonded or compulsory labour, slavery or human trafficking;

- compliance with all applicable national laws and regulations regarding working hours, minimum wages and benefits.
- Having appropriate processes and due diligence procedures in place to highlight any possible risks.

## **OUR SUPPLIERS AND DUE DILIGENCE**

Our procurement process involves initiatives to identify and mitigate risk of modern slavery. . All suppliers are expected to comply with the principles set out in the UMG Corporate Responsibility Policy (as well as ensuring compliance within their own supply chains) and may be required to evidence their adherence at least annually.

We endeavour to ensure that contracts with suppliers and contractors contain provisions requiring those third parties to comply with applicable laws and permit us to terminate relationships with any suppliers who do not comply with those laws. Notwithstanding the steps we take in this area, it is ultimately our suppliers' duty to respect the applicable laws and ethics on human rights.

## **RISK ASSESSMENT**

Due to the nature of our business and the fact that the majority of our suppliers are based in Europe, we assess that there is very low risk of slavery and human trafficking in our business and supply chains. Our hiring procedures and employment policies ensure that there is a very low risk of slavery and human trafficking in our business. We do not have specific key performance indicators in this area as we would expect any instance to be a breach of law and/or our company policies.

## **TRAINING**

We encourage our staff to be alive to the risks of modern slavery. Our Code of Conduct identifies the risks of modern slavery in our business and sets out our policy in relation thereto. The Code of Conduct is made available to all employees and periodical online training is provided to ensure they are familiar with its principles.

This statement has been approved by the board of directors of UMG Supply Chain Limited.

Simon Carmel

Director

28 March 2019

UMG Supply Chain Limited