



## MODERN SLAVERY STATEMENT YEAR END 2018

This statement sets out the steps taken and policies implemented by ITV plc and its subsidiaries (together ITV) to identify, address and prevent modern slavery and human trafficking in the ITV business and supply chain during the 2018 financial year.

For copies of the relevant ITV group entities' 2016 and 2017 Modern Slavery statements please see the links below:

<https://www.itvplc.com/~media/Files/I/ITV-PLC/documents/governance/ITV%20PLC%20Modern%20Slavery%20Statement%202016.pdf>

<https://www.itvplc.com/~media/Files/I/ITV-PLC/CLEAN%20ITV%20plcs%20Modern%20Slavery%20Statement%202018%20final%201.pdf>

### Introduction

ITV is committed to ensuring that it does not participate in the violation of human rights and expects the same from its suppliers. ITV is a founding member of the TV Industry Human Rights Working Group set up to proactively address human rights issues in the television industry and raise awareness beyond it. Please click on the link below to find out more about ITV Responsibility:

<http://itvresponsibility.com/>

### Key points of progress in ITV's approach to modern slavery in 2018

- Mandatory training rolled out to all members of staff.
- Ongoing collaboration with the TV Industry Human Rights Forum.
- Implementation of a group wide Modern Slavery Steering Committee involving procurement, HR, legal and corporate responsibility teams.
- Group wide modern slavery risk assessment undertaken.

### Our business

The ITV group operates in the global media space as an integrated producer and broadcaster and employs over 6,000 people in 13 countries. Our operations can broadly be distinguished as follows:

- **Broadcast:** As a broadcaster, the ITV group operates the largest commercial family of channels in the UK. In addition to traditional broadcasting on our channels, we deliver our content on demand through numerous platforms including the ITV Hub.
- **Production:** Our production arm (ITV Studios) has a global presence, and is comprised of numerous individual production companies each with their own creative focus. Through ITV Studios, we produce content for both our own channels and also for third parties all over the globe.
- **Distribution.** Our distribution business sells finished programmes and formats worldwide.



Whilst ITV's broadcast and production operations are not identified to be high-risk industries<sup>1</sup> in themselves and all ITV entities are registered and established in low-risk jurisdictions<sup>2</sup> (by reference to the Global Slavery Index) we are aware that we engage with third parties who operate in high-risk industries and jurisdictions through our supply chains such as catering, cleaning and construction.

### Our supply chains

ITV deals with many independent producers and a wide range of suppliers of goods and services in creating, commissioning and broadcasting content. ITV's UK based entities engaged with approximately 25,000 suppliers in 2018.

### Group wide risk assessment

In 2018 ITV's Modern Slavery Steering Committee undertook a group wide risk assessment of modern slavery and human trafficking across the following areas:

1. ITV's treatment of workers/freelancers/ employees.
2. ITV's supply chain.
3. ITV's commissioning and production partners.
4. Acquisition of companies or businesses by ITV group companies.
5. Joint ventures and ITV's investments in companies that ITV does not control.

The group wide risk assessment ascertained the following:

- ITV's policies and procedures regarding modern slavery are available to all ITV employees and contractors.
- ITV's production arm is a fast paced industry with a need for a high volume of supplier engagements on a short lead time. Encouraging ITV's production companies to engage suppliers from an ITV approved list of suppliers ensures that ITV undertakes comprehensive due diligence of those suppliers' human rights practices and appropriate contract terms are in place.
- Training on modern slavery issues has been successfully rolled out across ITV – as demonstrated through effective due diligence and monitoring of projects that could be high-risk (e.g. the 2018 World Cup in Russia and productions that take place in high-risk jurisdictions).
- ITV has incorporated robust modern slavery due diligence policies into its corporate M&A / JV processes. This due diligence is mainly carried out by professional third parties.

### Group wide policies and procedures

- **How we treat our people**

We actively and at least annually review our HR and recruitment policies to ensure that we comply with all applicable laws and protect the rights and freedoms of all those working within our operations. Our recruitment and employment policies address issues such as whistleblowing, discrimination, health and safety in the workplace, holiday and sick pay. Each business area throughout our global operations has a dedicated HR team to provide continuous support and guidance on all these policies.

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<sup>1</sup> Gangmasters & Labour Abuse Authority's 'The Nature and Scale of Labour Exploitation across all Sectors within the UK' <http://www.gla.gov.uk/media/3537/external-nature-and-scale-of-labour-exploitation-report-final-version-may-2018.pdf>

<sup>2</sup> High and low risk jurisdictions assessed by reference to the Global Slavery Index <https://www.globalslaveryindex.org/>



ITV was the first broadcaster in the UK to be accredited by the Living Wage Foundation as a voluntary Living Wage employer. We pay all eligible employees and freelancers at least the real Living Wage or real London Living Wage.

- **Code of Conduct**

ITV's Code of Conduct sets out our business ethics for all our employees and colleagues. It includes, amongst other things, the whistleblowing process for individuals to raise any concerns including in relation to modern slavery or human trafficking. All staff are invited to speak up if they have any concerns or suspicions that any violation has taken place and will be protected from any retaliation.

Reports of violations of ITV policies are investigated thoroughly and remedial, including disciplinary, action is taken where necessary.

ITV's Code of Conduct is easily accessible by staff via the ITV intranet site and is also available publicly here: [https://www.itv.com/\\_data/documents/pdf/Code%20of%20Conduct%20\(May%202018\).pdf](https://www.itv.com/_data/documents/pdf/Code%20of%20Conduct%20(May%202018).pdf)

- **Training**

Mandatory training modules were rolled out across all of ITV's operations to all staff (regardless of their engagement status) throughout 2018.

These mandatory training modules included information on recognising aspects of modern slavery using examples relevant to ITV's business model where risk of slavery may exist e.g. productions in high-risk jurisdictions or engaging suppliers who operate in high-risk industries (e.g. catering). The training emphasised the need for due diligence to be completed and for everyone's responsibility for compliance.

Completion rates for all ITV permanent and fixed term staff was 98% as at September 2018.

In addition to rolling out the online mandatory training modules, bespoke training was provided to the production staff of international production studios.

- **UK shared services procurement practices and KPIs**

As ethical standards are vital to ITV's procurement decisions, in 2017 we engaged external professional advisors to assist us with creating a bespoke compliance questionnaire to identify where there may be risks of modern slavery occurring with our direct suppliers and through their supply chains (together with other potential risks, including anti-bribery and corruption, non-compliance with sanctions and data protection). This questionnaire was reviewed and updated accordingly in 2018. This questionnaire is issued to all new suppliers that ITV's UK Procurement team is involved in engaging. Where questionnaire responses result in a 'negative' answer i.e. supplier operates in a high-risk jurisdiction, Procurement conducts further investigations.

To ensure that the due diligence process is followed, ITV's UK Procurement team members have individual objectives to complete the due diligence questionnaires. Their objectives also require that all responses and required follow-up is logged.

ITV's UK standard terms of engagement with suppliers require suppliers to (i) comply with all applicable laws, including modern slavery laws; (ii) warrant that they have suitable practices and procedures in place to ensure that human trafficking and slavery does not take place in their organisations or their supply chains; (iii) notify ITV if they become aware of any violations; and (iv) allow ITV to audit them to ensure that they are complying



with modern slavery laws. Failure to comply with these requirements would entitle ITV to terminate the relationship with the supplier.

### Business area specific policies and procedures

- **Broadcast**

The Social Partnership Commissioning Commitments set out ITV's expectations of our production partners in relation to corporate responsibility (such as diversity, inclusion, environmental and charity). Third party producers are required to sign our Commissioning Commitments and provide evidence of compliance. From a modern slavery perspective this requires production partners to pay their workforce at least the real Living Wage, the London Living Wage or the minimum wage (for non-employees such as volunteers/apprentices/trainees) Please see this link for more details:

<http://itvresponsibility.com/resources/social-partnership/>

Commissioned production work in a high-risk jurisdiction by or on behalf of ITV is flagged to the Broadcast and Online Board for consideration. The appropriate Board member(s) will be accountable to ensure that appropriate risk mitigation measures are taken. Any major/ one off sports tournaments or large scale events undertaken by ITV (or on ITV's behalf) in a high-risk jurisdiction requires a separate review and risk assessment. Any major risk potential is subject to Management Board approval.

Case study: For Russia World Cup 2018 broadcast local facilitator arrangements were subject to an enhanced due diligence process and additional contractual warranties focussing on labour law compliance.

- **Production**

In 2018, the TV Industry Human Rights Forum trialed a set of questionnaires across production teams in the UK, including ITV. The analysis of responses identified the higher risk groups in production to be ancillary-type workers in catering, cleaning, transport, security, construction labourers and facilitators. It was also identified that an upfront assessment of production suppliers, guidance and training for production employees was the best form of due diligence.

In support of the Forum's findings ITV's production companies are required to engage suppliers from an approved supplier list and in accordance with ITV's Production "Ways of Working" process.

In addition, an enhanced risk assessment and due diligence process has been designed for ITV Studios' produced content that is made in a high-risk jurisdiction

Case study: a 2018 production in Cuba required detailed vetting of suppliers and contacts. Additional training was provided by the production's legal team for anyone travelling on location or supporting the production remotely.

- **Distribution**

ITV enters into licences with 3<sup>rd</sup> parties (**Licensees**) for the use of ITV's intellectual property for the creation, production and distribution of consumer products by the Licensees on their own account. Whilst these Licensees are not strictly suppliers and ITV does not typically have a role in managing the creation and manufacture of the products, ITV carries out a due diligence exercise to understand the Licensees policies and process in relation to modern slavery. A licence requirement is that the Licensees enter into contractual terms providing undertakings in relation to labour standards, inspections and compliance with anti-slavery laws. ITV also requires that these undertakings are in place between the Licensees and their own supply chains.



## Plans for 2019

In 2019 the Modern Slavery Steering Committee shall:

- Review the modern slavery risk assessment and due diligence processes implemented across the ITV group.
- Identify additional actions/measures that may be taken to reduce the risk of modern slavery occurring in ITV's operations and supply chain.
- Review effectiveness of (i) existing measures and (ii) implementation of new measures.

This statement is made in accordance with the Modern Slavery Act 2015 and constitutes the s.54 slavery and human trafficking statement of the financial year ending December 2018 for ITV plc and its following subsidiaries:

ITV Breakfast Limited  
ITV Breakfast Broadcasting Limited  
ITV Broadcasting Limited  
ITV Consumer Limited  
ITV Digital Channels Limited  
ITV Global Entertainment Limited  
ITV Network Limited  
ITV Properties (Developments) Limited  
ITV Rights Limited  
ITV Services Limited  
ITV Studios Limited  
ITV 2 Limited  
Mammoth Screen Limited  
SDN Limited  
TwoFour Broadcast Limited

This statement has been approved by the Board of Directors of ITV plc on 21 February 2019.

Carolyn McCall  
Chief Executive