

Reach

Reach plc
Modern Slavery Act Statement
for financial year ending 31 December 2023

Reach plc (the 'Company' or 'Reach' or the 'Group' or 'We') is committed to ensuring that there is no slavery or human trafficking within our supply chains or in any part of our business. This statement is made by the Group in accordance with the Modern Slavery Act 2015 (the 'Act').

Reach fully supports the principles of the Act and outlined below are the steps we have taken during 2023 to ensure our continued compliance with the Act.

Our structure, business and supply chains

We create and distribute content to audiences across the UK and Ireland, through paid-for and free newspapers and magazines, and across the English-speaking world through multi-platform digital sites (desktop, mobile and app). We are led by a Customer Value Strategy, getting closer to our customers to enhance both our content offering and our data-led advertising opportunities, helping us to improve our long-term sustainability and ensuring our activities benefit all of our stakeholders and the Group overall.

Further details on our business model can be found within our 2023 Annual Report, or on our website www.reachplc.com.

It is crucial that we develop strong working relationships with our suppliers, so we can enhance the efficiency of our business and create value, and make sure we treat suppliers in line with our values and ethical standards. We outsource a number of our activities to third-party suppliers and providers.

Our main supplier sectors include paper, contracted printing, product distribution services and waste management and recycling. We also engage suppliers of IT and communications services, cleaning, catering and other facilities management services. The Group's operations and the majority of its suppliers are predominantly in the UK and comprise light manufacturing, office based activities and distribution.

A small number of our suppliers are spread over a wider geographical area, including organisations based in America, Ireland, Germany and China, and we are keen to ensure that the organisations we do business with recognise the importance of complying with the Act and other relevant slavery and human trafficking laws applicable in the regions in which we operate. We believe some suppliers will operate in higher risk territories and may present a higher risk to the business. In considering how we work with suppliers, we refer to the Global Slavery Index, to review and identify countries which could be deemed as high risk. Risks that are specific to the sector in which Reach operates are also considered by the Group when choosing suppliers. For example, newsprint paper is sourced from countries under high standards of anti-slavery legislation - North America, UK, Europe, and Scandinavia.

We engage with our suppliers in the following ways:

- Logistics efficiencies and environmental management
- Supplier conferences
- Standard terms of business
- Regular supplier meetings, including business plan presentations
- Contingency planning
- Commitment to use of newsprint paper produced from fibre using recycled material or wood from certified sustainable forests
- Discussing key regulatory or governance changes including GDPR, Carbon or other Environmental, Social and Governance ('ESG') matters

Due diligence & risk management processes for Modern Slavery and Human Trafficking

Reach has an established Modern Slavery Working Group (the 'Working Group'), chaired by the Chief Financial Officer who is a member of the Reach Board, and consists of senior managers from across the business in various functions including Operations, Legal, Technology, Risk and Internal Audit, HR and Company Secretariat. The Working Group formally meets at least twice a year and is responsible for reporting, monitoring and responding to any modern slavery issues which may arise within the business.

Whilst we believe our risk profile is low due to the UK centric nature of our operations, we recognise that the Group could be exposed to greater modern slavery risks when dealing with certain suppliers, especially those operating in certain other territories. To help identify and mitigate these risks, our standard purchasing terms and conditions for suppliers include confirmation of supplier compliance with the Act, and we have communicated our expectations to our suppliers, including their obligations to notify us of any breaches of the Act. These standard purchasing terms and conditions, which are available on our website www.reachplc.com, include appropriate modern slavery provisions, requiring the supplier to comply with the Act, and all laws, regulations and government guidance relating to it at all relevant times, and to immediately notify the Group if it has reason to believe that it or any member of its supply chain is in breach, or is likely to breach, the Act or if it receives a communication from any person alleging breach of the Act. Templates used for supplier agreements contain compliance clauses on anti-slavery, with termination rights for non-compliance.

If we are informed there has been a compliance failure, the Group is willing to engage with suppliers on a case by case basis and, if possible in the circumstances, senior management will seek to agree to a resolution with the supplier that is appropriate and in compliance with our Anti-Slavery Policy (see below). If a compliance failure was to be identified, Reach would follow up with the supplier on a regular basis to determine whether appropriate action had been taken to prevent any further compliance failures.

We expect our suppliers to engage with us in a constructive and responsible way in order to resolve any issues in a timely manner. The Group reserves the right to refuse to onboard suppliers unable to demonstrate their policies on, and willingness to comply with, the Act.

Where the Group has licensees that operate in a high-risk country for modern slavery purposes, our Anti-Slavery Policy forms part of the contractual arrangements and confirms the standards expected from contractors, suppliers and other business partners.

Senior managers within the Group are instructed periodically to undertake an exercise to review their active suppliers (with a material spend), or if there was any reason to seek direct confirmation from the supplier due to the supplier's country of operation or the nature of the product supplied, and provide confirmation to the Working Group whether they had identified any high-risk suppliers based on the location of their operations. For 2023 the Group undertook a more targeted and systematic approach to reviewing supplier compliance, with a focus on the nature of goods or services provided and the country from which the goods or services are provided. The 2023 review also included a sample of active suppliers with lower-value spend.

The Anti-Slavery Policy and ensuring staff understand their obligations under this policy continued to form part of the annual compliance training. The Anti-Slavery Policy was last reviewed by the Working Group in May 2024, and approved by the Reach plc Board in May 2024.

Reach's policies and training in relation to slavery and human trafficking

In keeping with Reach's commitment to act ethically, sustainably and with integrity in relation to all its business dealings, many of our existing policies are relevant and mutually supportive in ensuring that modern slavery practices or human trafficking activities are not tolerated in any part of our business.

Reach's Standards of Business Conduct Policy applies to all employees within the Group. This policy is an overarching document that sets out, in practical, common-sense terms, what acting in a 'professional', 'moral' and 'ethical' manner means on a day-to-day basis. All staff are issued with our Standards of Business Conduct Policy when onboarded, which aids the promotion of our ethical standing within the business.

Reach's Anti-Slavery Policy, which is reviewed and updated on a regular basis, details the signs that identify modern slavery, describes the responsibilities of staff to look out for such indications of modern slavery, and explains how to report any suspicions of modern slavery to senior management (including through the use of the whistleblowing hotline, described below). The Anti-Slavery Policy can be found on the Policies section of our website www.reachplc.com. We have enabled our staff to understand more about modern slavery in the workplace by providing additional information and guidance, such as referring staff to the UK Government's modern slavery website for additional helpful literature on this issue.

The Group's Procurement Policy seeks to ensure the Group does not take on unacceptable risks when onboarding a supplier, including those relating to modern slavery. During 2023, a revised onboarding and due-diligence process was introduced and this requires business managers to assess the risk of modern slavery occurring in any existing or proposed new supplier, by considering the country from where the supplier operates or the product is sourced and the nature of service being provided. The Group expects its suppliers to adhere to the requirements of the Act and will not engage a new supplier if we are informed they exploit workers, disregard health and safety laws and wilfully damage the environment.

The Standards of Business Conduct Policy, the Anti-Slavery Policy and the Procurement Policy form part of the suite of policies that all employees are required to confirm they have read and understood on an annual basis.

A summary of the Group's Procurement Policy and Standards of Business Conduct Policy can be found in the Corporate Governance section of our website www.reachplc.com.

We operate a Group-wide whistleblowing policy (the Speak Up Policy), and an independent reporting hotline to facilitate confidential reporting of illegal or unethical behaviour. Staff are able to report anonymously. All complaints raised by staff are investigated by senior management. During 2023, the Group had no reports involving modern slavery issues or concerns.

We have embedded Group policies which strictly prohibit any form of discrimination based on gender, race, disability, sexuality, religion or age in the workplace. We respect the human rights of our employees through ensuring all employees are issued with clear contracts of employment, that working hours as standard are set within the working time directive maximum thresholds, and have committed to ensuring that no employee will be forced to opt out of applicable working time regulations. Our employees are paid for work undertaken and receive holidays and rest periods in line with regulations. We monitor employees' holiday usage to ensure they take statutory entitlements, reducing the risk of breaches of regulations by publishing employee entitlements. Under our contracts all of our employees are paid above national minimum wage thresholds. The Group does not have any zero hour contracts.

During 2023, as well as requiring staff to complete their annual compliance training, managers who have direct line management responsibility and an authority limit, were required to review the training module on modern slavery. The training module included further details on how modern slavery can affect our business and how to identify and report it. During 2023, the Working Group reviewed and updated the training module (which was first implemented in 2020), and multiple choice questions were introduced to test staff's knowledge and understanding. Examples of modern slavery, which are relevant to our industry sector, were also provided to help staff identify instances of modern slavery in the workplace.

Impact and monitoring

The Working Group measures progress by monitoring the completion levels of online training on modern slavery for managers who have direct line management responsibility and an authority limit,

and of employees completing their annual compliance training and confirming they understood their obligations under the Anti-Slavery Policy. In line with the updated process implemented in 2022, completing the training was also compulsory in 2023 in order to receive a bonus. Failure to complete the training could also result in disciplinary action.

The Working Group also monitors responses from suppliers who were contacted to confirm their modern slavery arrangements as part of the due-diligence exercise explained earlier. No issues in respect of modern slavery were identified.


Effectiveness and ongoing compliance

The Working Group will continue to meet throughout 2024 in order to monitor the implemented controls. The Company will periodically assess the suitability and effectiveness of its processes and report on progress on an annual basis, in compliance with the Act.

As the inherent supplier risks change over time, we will review and update our policies and approach to addressing slavery and human trafficking risks in the Group's supply chain.

This statement is made pursuant to section 54(1) of the Act and constitutes the Group's modern slavery and human trafficking statement for the financial year ending 31 December 2023.

Approved by the Board of Directors of Reach plc on 23 May 2024,



Jim Mullen
Chief Executive Officer

List of subsidiary Group companies within scope of section 54(2) of the Modern Slavery Act 2015

- Reach Midlands Media Limited
- Reach Printing Services Limited
- Scottish Daily Record and Sunday Mail Limited
- Express Newspapers
- MGN Limited
- Reach Regionals Media Limited