

Slavery and Human Trafficking Statement of The Scott Trust Limited (the “Scott Trust”) and Guardian Media Group plc (“GMG”) for the year ended 31st March 2019

This statement is made pursuant to the Modern Slavery Act 2015 (the “MSA”). It sets out what the Scott Trust and GMG 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 contributions, memberships, subscriptions and advertising. Our journalism has a global reach and we have offices in the UK, Australia and US.

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 within our business on 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 are measured and requires suppliers to comply with applicable legislation and regulations and be aware of the key risks to human rights in their operations and supply chains, including the MSA.

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.

As part of our procurement process, we have identified higher risk categories, and it is mandatory for all new suppliers in such categories to go through the ethical assessment process, 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.

Where appropriate, contract signatories are informed that modern slavery must be considered before signing any supplier terms and conditions, whether in the higher risk categories or otherwise.

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.

The process involves engaging with the suppliers in these higher risk categories, including but not limited to, highlighting relevant sections of the code with the relevant supplier.

In addition, our supplier terms and conditions require suppliers to comply 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 include audit and termination rights to enable more effective monitoring of those suppliers and to enable us to take the relevant action.

We have policies in place to ensure that we meet our responsibilities to respect and protect human rights, including in relation to modern slavery, including 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.

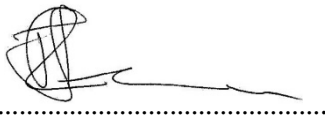
We have principles that assist decision-making in the event of a breach of standards, for example a requirement to address any breach immediately.

Training

Our procurement team has been trained to assess the risks of modern slavery throughout the tender processes and contract renewals.

This statement is made pursuant to section 54(1) of the MSA and constitutes the Scott Trust and GMG's slavery and human trafficking statement for the financial year ending 31st March 2019.

Approved by the Board of Directors on 2nd July 2019.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right. Below the signature is a dotted line.

Richard Kerr

Chief Financial Officer

Date: 2nd July 2019