



ITV Modern Slavery Act Transparency Statement

March 2026



Introduction

ITV plc and our subsidiaries are committed to identifying, addressing and preventing modern slavery in our operations and supply chains in a manner that puts concerns for potential victims at the centre. We understand modern slavery to encompass slavery, servitude, forced labour, human trafficking, sexual exploitation and child labour. However, we also know that modern slavery is at the extreme end of a spectrum of labour rights issues and that we need to address labour issues well before they reach the threshold of modern slavery. For ITV, our most salient risks relate to working conditions and labour practices in our supply chains.

This is our tenth modern slavery statement in which we set out the steps we have taken during the 2025 financial year in support of this commitment, pursuant to the UK Modern Slavery Act (2015).



Progress on commitments made in previous statement

Business area	Commitments made in 2025 statement	Progress made in 2025	Commitments for 2026
Governance	Explore ways to strengthen how other types of third parties, beyond suppliers, are incorporated into our third-party risk management processes.	Upgraded the system that tracks risks in ITV's productions, with a particular focus on legal compliance, human rights and governance.	Deliver improved workflow integration with Studios, Legal & Business Affairs and Procurement, ensuring legal and contractual considerations are embedded earlier in the risk management process.
TV production	Look for opportunities to improve attention to labour practices in productions commissioned by our M&E Division.	Required all producers and third parties to meet the CIISA Standards that aim to create consistently safe and inclusive workplaces.	Review and update the Risk Management Tool used by the M&E Division for commissioned productions.
Workplace Services	Conduct a review of suppliers in Workplace and any associated labour rights risks.	Commissioned a comprehensive review of our entire Workplace Services function, including an in-depth assessment of our suppliers, contractors, and service providers.	Maintain strong relationships with those working for our suppliers, contractors and service providers.
Merchandise	Create more awareness of due diligence processes among the team members dealing with merchandising and events.	Engaged closely with the merchandise supplier for the online shop to build our understanding of their due diligence processes. Required licensees to complete due diligence questionnaires.	Continue to review brand and licensing approach to improve oversight of merchandise supply chains.
People	Improve the global rollout of policies and ensure ITV meets all requirements of the new Employment Rights Bill.	Successfully rolled out 11 international policies in full. Completed change impact assessments ahead of the Employment Rights Act coming into law and established working groups to ensure business readiness.	Roll out a further six policies and prioritise changes planned to meet the Employment Rights Act.
Procurement	Improve system controls at the point where buyers are making decisions to ensure potential risks have been appropriately considered.	Developed a prompt which all buyers receive when onboarding a new supplier, helping to ensure that they have followed the correct policies and engaged the relevant internal support teams.	Further develop our Supplier Relationship Management approach and internationalise our Supplier Code of Conduct.

Measuring our performance

In 2025, we continued to track a series of key performance indicators relating to our work on modern slavery. In 2026, the Human Rights and Modern Slavery working group will discuss the organisation’s goals in relation to modern slavery.

What we are measuring	How we are measuring it (KPIs)	Performance in 2024	Performance in 2025
Awareness of modern slavery by employees through annual mandatory online training	Completion rate of annual mandatory online training (global figure for all modules)	90%	88%
Ability to raise concerns through the Speaking Up process	Percentage of employees who agree or strongly agree that “I am comfortable raising ethical concerns, suspicion of or observed misconduct through the Speaking Up channels” (Note: Full Engagement Surveys are issued every two years)	We ran workshops with the Ambassador network to raise awareness of the Speaking Up portal, with a specific emphasis on confidentiality and anonymity. Qualitative feedback showed these were effective in improving confidence.	75% (Note: A similar question is asked of senior leaders in their compliance survey and received a confirmation rate of 100% in 2025.)
Implementation of our Living Wage commitment (UK)	Percentage of our fixed-term and permanent workforce on the real Living Wage ¹ (as at Dec 2025)	2.2%	2.0%
Due diligence process for new suppliers	Cumulative number of suppliers that have gone through further due diligence as a result of elevated modern slavery risk	327	421
Risk assessment of productions	Number of ITV productions which triggered further due diligence as a result of a raised risk of modern slavery	18	4
Potential incidents of modern slavery	Number of concerns raised about potential modern slavery through our Speak Up channels	0	0

¹ As at December 2025 - National Living Wage is £13.45 per hour; London Living Wage is £14.80 per hour

Our structure, business & supply chains

Overview

ITV is one of the UK's best-known brands and one of the longest established television companies, formed through mergers of regional broadcast licence-holders. We have since expanded both organically and through acquisitions of production, distribution and digital content businesses and in 2025 we celebrated 70 years of ITV. We are one of the largest independent producers in the world, creating, producing and distributing a broad range of programmes.

We are headquartered in the UK, with significant operations in the US, Netherlands, Australia, France, Germany, Italy and Spain.

- **Production:** ITV Studios' main business is creating, producing and distributing high-quality content for broadcasters and platforms around the world. We make around 7,500 hours of original programming a year

across 60 production labels and our global footprint spans 13 countries. You can find a list of all our labels and where they are located on the [ITV Studios website](#).

- **Media & Entertainment:** In the UK, ITV operates the largest commercial family of channels. We broadcast, commission and acquire news, sport, documentaries, entertainment, drama, comedy and children's programmes, distributing them via our channels and on demand through platforms such as ITVX. We promote programmes through marketing activities and also sell advertising space and programme sponsorship opportunities on our channels and platforms. In 2025, there were 75 external companies commissioned which had at least one programme with a first transmission on one of the ITV channels.

- **Distribution:** We distribute finished programmes and formats worldwide through licensees, including the sale of finished tapes of scripted and unscripted programmes to international broadcasters and issuing licences of TV formats internationally to independent third parties. We distribute our own formats (such as The Voice, Love Island and I'm a Celebrity) and formats for which we have acquired the rights (such as My Mom Your Dad and Parents' Evening).
- **Brand and licensing:** ITV generates revenue directly from consumers through subscription video on demand (SVOD) on ITVX, and by commercialising our intellectual property in ancillary categories, such as competitions, live events and set tour attractions, games apps, merchandise and pay per view events.

Our colleagues

Our colleagues include permanent and fixed-term employees, and five categories of 'non-employees', including freelancers (mainly in TV production) and people working at ITV sites on behalf of our suppliers, such as those in cleaning, maintenance and catering.

As of December 2025, we employed 6,485 people globally as full-time equivalent employees, 5,233 people in the UK and a further 1,252 people across the US, Netherlands, France, Germany, Italy, Spain, Finland, Norway, Denmark, Sweden, Belgium and Australia. Engagement of non-employee colleagues is managed mainly through centralised ITV systems. In terms of approximate numbers and dependent on volumes of commissions:

- In the UK (except for UK scripted dramas), there are around 2,300 unique freelancers at any one time,



many of whom have multiple and concurrent assignments in any given year.

- In UK Scripted Dramas there are up to 3,000 unique freelancers in any given year.
- Across ITV's independent labels there are up to 1,000 unique freelancers in any given year.

Hiring at our international labels is managed locally and dependent on territory employment and tax legislation. In 2026, we will conduct a review of overseas contracting to identify any gaps or issues.

Our supply chains and partnerships

Across ITV we buy workplace and property services, technology and professional services. The majority of our spend in these categories is consolidated with larger suppliers, with which we have long-term relationships. Most of our

immediate (Tier 1) technology and software suppliers are the main point of value add in the supply chain, which then features a range of minor suppliers that are difficult to trace back to raw materials. Our Workplace Services suppliers include labour supply chains for cleaners, security and catering. We regularly engage directly with workers providing services on ITV premises through our Workplace Services team.

Within our Studios division, the main activity is TV production, which includes supply chains for clothing, equipment, props, set construction materials, production facilities, energy, vehicles and subcontracted services such as post production, catering, cleaning, security, driving and set construction. These supply chains are more fragmented given the nature of local production requirements and many suppliers are small or medium-sized enterprises. ITV has made considerable progress

in understanding the nature of ancillary services and labour supply to productions, particularly through our support of the [TV Industry Human Rights Forum](#), which carries out stakeholder engagement on behalf of its broadcaster members with those providing such services. In 2025, we supported two such projects: one to understand the supply

of post production services and a second to understand the supply of cleaners, caterers, drivers and security guards to UK TV productions. We currently have more limited insight into the supply of goods used by productions, which tend to be purchased in small quantities and vary by production.

Case study Post production suppliers

In one of the actions taken in response to the research report '[Let's Fix it in Post](#)', ITV's 15 UK Scripted labels contacted all their post production facilities to map the extent to which such work was outsourced to countries with fewer employment rights. This process identified that on one programme, a very small amount of visual effects work was outsourced to Nepal and on a second programme, a similarly small amount of visual effects work was outsourced to Vietnam. Both countries rank below average for fundamental rights on the World Justice Project's Rule of Law Index. The other facilities confirmed that they had not outsourced work to any other countries on ITV shows in the previous 18 months. One stated that they have now changed their contracts to require approval for outsourcing to foreign countries so that it can be flagged if it comes up. As a result of the mapping exercise, we have greater visibility of post production outsourcing and have been able to reduce the related risk rating for our scripted productions.



Within our Media & Entertainment division, we commission shows from ITV Studios, ITV Studios-owned labels and from independent production companies. Producers are briefed by ITV Commissioners on what we are looking to commission and they then pitch their ideas. Ideas are either rejected, developed further or commissioned, at which point we confirm and check health and safety, duty of care protocols and other aspects before budgets are agreed and agreements signed. We expect all third party producers to comply with ITV's Code of Ethics & Conduct and to meet the [CIISA Standards](#) that aim to create consistently safe and inclusive workplaces, and we gather feedback on an ad hoc basis through regular engagement with them. We currently have limited insight into the supply of labour or goods into our commissioned productions, which are challenging to map due to their transient and short-term nature.

Our broadcast operations focus on getting programmes to air or making them available on our digital platforms and ensuring technical compliance for them. Our main supply chains for broadcasting include suppliers of IT support and infrastructure, data centres, transmission and distribution partners, software and technology contractors. This division also spends on marketing and production activities.

Within distribution, brand and licensing, we work with partners and sponsors. We also have supply chains for merchandise sold in our online shop and for our set tours of Coronation Street and Emmerdale. We have not yet mapped our merchandise supply chains below Tier 1 but we continue to work with our merchandise suppliers to understand and improve their due diligence practices. ITV also enters into licensing arrangements with other brands and licences with third parties (licensees) for the use of ITV's intellectual property

to create, produce and distribute consumer products and events by the licensees on their own account.

Governance

ITV's approach to modern slavery is overseen by a Human Rights and Modern Slavery working group, made up of senior people from across the business. The group is responsible for identifying and assessing modern slavery risks, agreeing actions to address them and tracking progress. The working group reports to ITV's Risk Committee, which focuses on the most significant modern slavery risks and decides when issues need to be escalated. The Risk Committee does not manage day-

to-day issues but supports the Audit and Risk Committee, which provides oversight on behalf of the Board.

Legal & Business Affairs, Corporate Compliance and Sustainability teams monitor relevant legal and regulatory requirements and support the business in meeting its modern slavery obligations. The working group is also supported by an independent external subject matter expert who provides advice on legislation, emerging risks and good practice, and supports information gathering. No modern slavery issues were escalated to the Risk Committee or the Audit and Risk Committee during 2025.



Policies in relation to slavery and human trafficking

Our operations

All our policies flow from ITV's [Code of Ethics and Conduct](#), which makes specific reference to modern slavery in order to reflect ITV's proactive approach. The Code has been translated where required for all international markets in ITV Studios and communicated through ITV's Ambassador networks, senior management bulletins and CEO sponsorship to ensure that this is a 'tone from the top' message. Compliance with the Code is mandated in all employee and freelance contracts and supported by mandatory training.

The Code explains ITV's aim to identify and address the risks of modern slavery in our operations and supply chains by conducting human rights due diligence on our business activities and relationships, reviewing our own commissioning and purchasing practices, engaging our suppliers, partners and peers to find ways of working together to reduce risks,

enabling workers in our operations, productions and supply chains to raise concerns by speaking up, listening to those potentially affected by poor labour practices and taking action to address the issues they flag, being victim-centric in our response. The Code also reflects ITV's [Speaking Up](#) and Procurement Policies, together with our commitment to diversity, equity and inclusion, respect, dignity and understanding. This commitment includes being accredited by the Living Wage Foundation as a voluntary Living Wage employer in the UK since 2014.

In 2025, we developed a set of human rights principles to support the work we are doing across the business and make sure our commitments are clearly set out. The principles were developed through a process of engagement with members of ITV's Human Rights and Modern Slavery working group and are aligned with the UN Guiding Principles on Business and Human Rights, the

OECD Guidance for Responsible Business Conduct and the International Labour Organization (ILO) Standards.

Policies are published internally on ITV's intranets and communicated via internal communications channels. Policies are reviewed at least annually and if a policy is created or amended then it is republished and an update goes out in a subsequent staff bulletin. All staff must complete a set of mandatory training modules related to core policies, with tailored training available for higher-risk teams. For ITV's international businesses, these training modules are translated and relevant changes are made to UK-specific references. Compliance is promoted both centrally and locally through senior managers, People, Finance, Legal & Business Affairs and Corporate Compliance teams, all of whom provide support and guidance on ITV's policies.

Case study

Embedding and enforcing policies

Twice a year, around 300 senior leaders across ITV are required to complete a compliance survey that is designed to assess awareness and understanding of key group-wide policies and identify areas for further support or training. This survey includes a section on modern slavery, with respondents required to confirm that they have read and understood ITV's position as set out in the Code of Ethics & Conduct and to declare any modern slavery incidents that they are aware of during the previous 6 months. The survey also reinforces key messages about speaking up / raising concerns and encourages respondents to ensure that their teams understand the Code and other in-scope policies and know how to escalate any breaches.



Production companies

Where we have direct control of a production company or a majority stake, we require it to adopt our policies and procedures in relation to modern slavery as set out in ITV's Code of Ethics and Conduct. For our UK work, ITV has a production portal called Compass, which is an important way for productions to align to our standards and policies.

In 2025 and in response to feedback from international colleagues, we continued to develop separate portals for our international labels and studios in different languages and territories. These host localised versions of ITV's global policies that have been edited (and, if needed, translated) to meet local legal requirements. We now have 11 international policies fully rolled out, including the Code of Ethics & Conduct, Speaking up and Prevention of Sexual Harassment policies. There are five more

policies in the pipeline to be rolled out in 2026.

Case study Child labour

ITV is committed to addressing illegal or harmful forms of child labour in our supply chains. As an entertainment business, our productions also directly employ children as performers in our scripted shows. In the UK, we have a Safeguarding Policy and supporting guidance that is implemented across ITV and [Child Protection Guidelines for Producers](#), which all our commissioned productions must comply with. In 2026, we will roll out an international version of our Safeguarding Policy. We will also be supporting the TV Industry Human Rights Forum's research into children's rights and TV production, which will consider child labour in the TV industry and the different ways in which it is relevant for us as a producer and broadcaster.

Suppliers

Our [Supplier Code of Conduct](#) sets out the expectations that we have of our suppliers, including in relation to human rights and labour, and aligns with the ILO core conventions. For our UK business, we have a [website for suppliers](#) that hosts all our policies, expectations and resources in one place. Suppliers are required to take steps to understand and address the risk of modern slavery occurring in their operations and supply chains. This includes ensuring that workers are not illegal, forced, involuntary, bonded or exploited and are free to terminate their employment without fear of penalty. No worker should be charged fees or costs for recruitment or be required to lodge deposits, identity or travel documents. If potential victims are found, the Supplier Code of Conduct requires suppliers to prioritise their safety. We expect suppliers to notify ITV and work together to remediate any incidents of modern slavery.



Our Procurement Policy provides guidance to colleagues in assessing risks when bringing in new suppliers and points to specialist expertise across the business. It highlights low-cost labour as a particular risk area and requires enhanced due diligence of suppliers that use low-cost labour to deliver products and services to ITV. To reinforce this, in 2025 we developed a prompt which all buyers receive when onboarding a new supplier, helping to ensure that they have followed the correct policies and engaged the relevant internal support teams. In 2026, we aim to further develop our Supplier Relationship Management approach and to internationalise our Supplier Code of Conduct.

Assessing and managing risks related to slavery and human trafficking in our business and supply chains

Overall approach to risk management

Across ITV, business divisions are responsible for identifying and managing risks within their operations, incorporating the implementation of mitigation actions, supported by a combination of bottom-up risk assessments and central oversight.

Central oversight to support our business divisions includes Group Risk, Legal & Business Affairs, Corporate Compliance, Health & Safety, Procurement, Sustainability, People and Workplace Services, driving a consistent approach and ensuring appropriate escalation. Identified risks are assessed and reported in line with ITV's Governance Framework.

We conduct our annual human rights and modern slavery risk review at the same time as

we gather information for the modern slavery statement, using a combination of desk-based research and interviews with key internal stakeholders. We review available data relating to supplier audits and speaking up cases, as well as relevant recent research from industry bodies such as the TV Industry Human Rights Forum, the Creative Diversity Network, the Film and TV Charity's Looking Glass survey, the US Department of Labor list of goods produced by forced labour and the Business and Human Rights Centre's publications.

In Q1 2025, the risks identified through this process were taken to the Human Rights and Modern Slavery working group for review and prioritisation. The working group and the risk assessment process are co-led by representatives from three key departments: Sustainability, Procurement and Corporate Compliance.

Overall, we identified 14 areas of human rights risks in 2025. The ones relevant to this statement are:

- Working conditions in the supply chains of ITV's own productions, commissioned and acquired content, news, workplace services, merchandise and commercial.
- Freelancers and workers in supply chains being unaware or unable to raise concerns and/or fearing retaliation.

Our own workforce

We conduct thorough recruitment processes for all roles, hiring directly wherever possible, and we are confident that none of our direct employees managed through central systems is experiencing conditions of modern slavery. Where we use agencies, these are only for technical and highly skilled roles. We engage our workforce through our biannual employee survey, interim pulse

surveys and via our employee networks to understand areas of emerging risk. In 2026, we will focus on strengthening two-way communication so our colleague voice is heard more regularly outside of the formal surveys.

TV production and broadcasting relies on engaging freelancers and subcontractors. In our UK operations, only trained Approved Engagers can book freelancers and engagement with freelancers is via Approved Engagers and subsequently with relevant production teams. Policy, process, templates, training and systems are provided centrally for freelancers and delivered by Approved Engagers. All our freelancers are also able to use the Employee Assistance Programme (EAP). In 2025, we rolled out improvements to our freelancer recruitment processes, including better information, more robust right to work checks and using specialist support



to validate documents. We are also represented on an industry group, [Action for Freelancers](#), which seeks to pool resources and deliver tangible outcomes for freelance workers in the TV industry.

In 2025, we focused on preparing for the UK's new Employment Rights Act which links to modern slavery by aiming to prevent the conditions that enable labour exploitation and by strengthening the enforcement of workers' rights. We have been actively planning for the new legislation and completing change impact assessments as and when further details are published. We already meet or exceed some of the requirements of the Act, but there will be new rights and practices to introduce via our policies and ways of working. We have established working groups to oversee any changes and ensure business readiness. We are currently prioritising the changes planned for April and October 2026.

Case study

Action for Freelancers

ITV is a participant in Action for Freelancers, a pan-industry collaboration to support freelancers within the UK television sector. The project's aim is to champion and safeguard our skilled and valuable freelance workforce by facilitating the entire TV industry to follow standard practice, work and innovate together, and create a culture in which freelancers can thrive. The group aims to work closely with freelancers, seeking to elevate and amplify their voices so they can be heard by all the industry. Action for Freelancers holds online forums every three months for freelancers to hear the latest news and updates and ask questions.

Our suppliers

Our centralised Procurement function supports all of ITV's UK operations and operates a list of pre-approved suppliers for relevant spend categories. ITV's [standard terms of engagement](#) with suppliers require them to:

- comply with all relevant laws, including modern slavery legislation;
- warrant that they have suitable practices and procedures in place to ensure that bribery, corruption and modern slavery do not take place in their

- organisations or supply chains;
- notify ITV if they become aware of any violations; and
- allow ITV to audit them to ensure compliance with modern slavery laws.

Buyers within ITV have access to a short, easy-to-read summary of risks to consider when working with suppliers and implementation of our Supplier Code of Conduct is supported by our Vendor Risk Management framework. Our approach is that the Procurement team should be involved for all

new supplier engagements with a value of over £100,000, or where risk is considered high according to defined criteria, to ensure appropriate pre-qualification questions are answered and evaluated. These suppliers are required to answer scoping questions that cover a broad range of risk domains, including modern slavery. Selected suppliers will then receive a more detailed modern slavery questionnaire. In 2025, we moved to using an outsourced service provider to help review critical suppliers, including their policies and modern slavery statements, which has formalised our process and provided more consistency.

Where issues are identified with a supplier, it may be necessary for ITV to terminate the engagement and our standard terms include provisions that would allow us to do so. However, we understand that in certain cases termination is likely to exacerbate the risk to already vulnerable workers. In these circumstances we would



seek to work with suppliers to deliver compliant practice and use termination as a last resort. In 2025 our due diligence process did not uncover any issues or incidents of concern with existing suppliers but in some cases responses to our modern slavery questionnaire have contributed to potential suppliers not progressing.

TV production, including sport and news

Through our own due diligence work and our involvement with industry bodies, we have identified that labour risks in TV production predominantly relate to:

- Working hours and conditions for freelance crew.
- Ancillary services that are subcontracted and where there is less oversight or control, such as cleaning, catering, security, driving and hospitality.
- Working hours and conditions for post production workers.

All ITV Studios productions are required to complete a series of questionnaires on a central risk platform. The system tracks human rights risk, with modern slavery treated as a distinct component within that score. In 2025, the system underwent a significant upgrade, with particular focus on legal compliance, human rights and governance. Key improvements include:

- Revised human rights scoring methodology, providing clearer differentiation between low, medium and high-risk productions and better visibility of modern slavery indicators within that assessment.
- Clearer governance ownership, supported by the Head of Corporate Compliance, Legal & Business Affairs, Studios Technology and Global Risk Operations.

Together, these changes strengthen both the assessment of risk and the management and

escalation of human rights issues, moving the platform further towards an integrated risk and compliance tool rather than a standalone production system. In 2026, we will deliver improved workflow integration with Studios, Legal & Business Affairs and Procurement, ensuring legal and contractual considerations are embedded earlier in the risk management process.

Any filming planned for high-risk jurisdictions is flagged internally to Legal & Business Affairs for additional support at an early stage. During the year, four productions flagged as high risk in relation to human rights prior to controls being applied. This reduction compared to last year is driven by several factors:

- Fewer productions filming in higher-risk territories in 2025, particularly South Africa and Romania.
- Improvements in procurement and contracting processes in higher risk locations, including

stronger supplier assurance.

- More robust and embedded production structures and oversight in higher-risk locations, especially South Africa, reducing reliance on ad-hoc local arrangements.

This means that while inherent risk remains in certain geographies, the pre-mitigation risk profile across the slate has improved materially.

The risk assessment process also determines assurance visits. The Global Risk Operations team conducted ten production assurance visits in 2025, six in ITV Studios, and four third-party commissions in Media & Entertainment. The process is based on the principles of International Risk Management Standard, BS ISO 31000, and applies both on screen, for programme participants, and off screen, for employees, crew and freelancers. The criteria for selecting productions for assurance includes the nature of



the production, past risk incidents, new or enduring format(s), location, participant demographics and profile of the show. In 2025, there were no modern slavery concerns or incidents identified in this process.

For ITV's own productions, our 'Inside First' initiative promotes the use of ITV's internal facilities where we have better oversight of labour practices.

In 2025, we continued to evolve our ITV Studios Supplier Network, which is part of our longer-term programme to build and evolve a resilient supply chain with a Supplier Relationship Management (SRM) approach. The information, provided on a central portal, makes it easy for production colleagues to identify a handpicked selection of recommended suppliers in different categories, where we have strong relationships and we have overarching frameworks in place. Our Procurement team conducts deep-dive key category

reviews of production suppliers, which include questions about labour practices, to identify gaps and encourage improvement.

Alongside the risk tracking and oversight process, we also monitor working practices on our productions through stakeholder engagement and in other ways:

- In 2025, we completed 3 'MOTs' on **unscripted productions**. The MOTs are an opportunity for us to talk to the production teams working on the shows, review our processes and practices and then take feedback if anything needs to be improved. Our teams value the opportunity to shine a light on what is working well and change anything that is not. We are also working with the Film and TV Charity's [Whole Picture Toolkit](#) for mentally healthy productions in unscripted, and our teams have found this a useful tool in both the pre-production and production phase of the show lifecycle.

- In **scripted productions**, we have continued to promote ways for staff, freelancers and ancillary workers to speak out if they have concerns about themselves, other people or any issue which they believe needs escalating outside of the individual production hierarchy. These include the Safecall reporting platform, plus we promote the use of the [Call It! app](#), which gathers anonymous data regarding health and safety, safeguarding, working conditions and experiences of bullying, harassment and discrimination.
- **ITV Sport** broadcasts sporting events from venues around the world, including rugby, football, snooker and horse racing. The main risks of modern slavery are in relation to our use of hotels and the security and catering provided at venues and stadiums, over which ITV has no sight of pay and conditions. To address these challenges,

we are strengthening our due diligence processes and ensuring that our crew on the ground know what to look out for, and we report any potential issues back to the Federations responsible for the events. Working on sporting events can also involve long hours, with crew often outside in all weathers. We support our crews as much as possible with good quality hotels, catering and a culture that offers development and progression.

- **ITV News** in the UK uses some well-vetted security suppliers but no other ancillary services. In terms of other labour risks, long working hours are part of many people's jobs and this is sometimes compounded by long travel times as crews cover large regional areas. They are encouraged to claim back time and days off in lieu. Our stakeholder engagement focuses on our audiences. We operate news diversity panels which comprise a range

of viewers who review our approaches to the way we tell our stories and feed directly into editorial decision-making.

Our Media & Entertainment division

For commissioned programmes, we operate a Risk Management Tool (RMT) to track and collate risks related to productions. This enables internal teams to pick up potential risks related to health, safety, security, welfare, legal and regulatory. Language on modern slavery is also included in the pre-greenlight completion forms. In 2026, we plan to review and update this tool.



Case study App for monitoring crew welfare

Some formats are more challenging than others, with crew welfare a particular challenge on adventure reality formats such as Race Across the World where crew are spread out. Our Swedish team developed an app to monitor crew welfare called the Employee Morale Survey. The crew receives a text message every morning and they answer the question 'How are you feeling today?' If the answer is 'Unhappy' we act immediately and the management team is notified so they can investigate further. The tool has since been used for our Swedish productions of Love Island and Ghost Hunt. Alongside the roll out of the app, we conducted a crisis management exercise to ensure the teams had practiced procedures in the event of an incident and understood how the app would be used.

Our brand, licensing and sponsorship partners

In relation to partners, we are exploring ways to integrate them into our third-party risk management framework. We currently use a set of guidelines to support decision-making and, in the UK, we predominantly work with well-known brands. During 2025, we declined to work with brands where there have been serious ethical concerns.

Our indirect supply chain

There are two thematic areas of risk in our indirect supply chain which remain priorities for us to address: merchandise and workplace services.

Merchandise continues to be an area of modern slavery risk for ITV as some of it is manufactured in low-cost countries. We have one supplier of internal merchandise for ITV that has undergone considerable due

diligence in terms of both human rights and sustainability. ITV's own merchandise purchases are a relatively small proportion of overall spend and we work to engage teams that place orders for merchandise to ensure they have understood and mitigated modern slavery risks. Our internal website for merchandise includes a social purpose section and shows the location from where goods are sourced. This is enabling the business to switch out regularly bought items from high-risk locations and engage employees on responsible sourcing practices.

We operate an online shop for members of the public to purchase programme-branded merchandise, which is run by a separate supplier. In 2025, we engaged more closely with this supplier to further build our understanding of their due diligence processes.

Higher risk for ITV are the supply chains for our global merchandise deals, where we enter into licences with third



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 suppliers as such, ITV does approve all products and signs off on all samples. For any product licences with a value of over £50k, the licensees are required to complete due diligence questionnaires, which include questions that seek to identify where risks might lie for modern slavery in terms of geography and business activity. ITV has a right to audit compliance with licence agreements.

In relation to **Workplace Services**, ITV directly employs people to deliver a number of services, including reception/front of house, logistics, building maintenance and compliance, and transport at our hub sites in London, Leeds and Manchester. We also provide a number of these services at c.70 sites throughout the country, from Edinburgh to Jersey.

We work with suppliers for security, cleaning and catering, and understand that roles in these services are often at higher risk of poor labour practices. Accordingly, we manage our contractors closely, building strong relationships with them and checking their employees' terms and conditions and levels of pay to ensure that all workers are paid at least the Living Wage (as determined by the Living Wage Foundation). Our main labour risks relate to the need to cut costs across Workplace Services, where much of the work is based on labour costs and the workforce are in relatively low paid roles.

To address some of the risks to these workforces, ITV pays the Living Wage as soon as it is announced, without waiting until its formal introduction each April. We also review the salaries of the managers and supervisors of those on the Living Wage and make sure they also get an increase that is agreed following the announcement.

In 2025, we commissioned an independent consultant to conduct a comprehensive audit of our entire Workplace Services function. This review covered our internal statutory compliance, as well as an in-depth assessment of our suppliers, contractors, and service providers. We found that our existing controls are robust: the audit returned all-positive findings, confirming that our partners are adhering to our high standards of labour practices and statutory requirements. This external validation reinforces that our strategy of close contractor relationship management and the early adoption of the Living Wage is effectively mitigating modern slavery risks across our diverse UK sites.

A note on audits

For TV production, our main suppliers are production companies and suppliers into productions, to which external ethical audit methodologies are not well-suited because of the short-term nature of productions and the huge variety of ways in which productions take place, from outside broadcasts to documentary film-making to studio-based shows. We conduct assurance visits to productions, engage directly with those working on them and make checks on working practices as set out above. We will continue to focus our resources in this way on addressing risks relating to how our TV programmes are made, rather than on developing an audit programme for productions, as this is how we can have the most impact.

Due diligence in relation to modern slavery – actions, programmes and initiatives

Due diligence on suppliers

Cumulatively, 421 suppliers have now been through our updated due diligence process after being identified as potentially high risk or as part of a tender or reassessment process. Just over half of these were then required to complete the detailed modern slavery questionnaire, which includes a question about employing low cost (i.e. minimum or living wage) or zero-hour contract workers to supply products or services to ITV. Of the potentially high-risk suppliers identified, 90% stated they had no low-cost labour or zero hours workers in relation to ITV's supply chain and no concerns were identified for the remaining 10%.

The data we have collected shows that 95% of suppliers that completed the detailed set of questions reported some form of good practice to address modern slavery and labour rights risks.

For example, 66% reported having a person assigned to address modern slavery and 78% had made a real living wage commitment, including 62% that had passed the commitment onto their suppliers.

Programmes to improve working conditions in TV production

For freelancers working on our TV productions, we have put in place a range of mechanisms to support them. For example, a human resources professional is always named on call sheets and on any employee assistance initiatives, such as Speaking Up or Call It!. We also do start up meetings to highlight the support that is available for each scripted production or long-running unscripted show.

At the end of 2025, we went live with a **Digital Right to Work Service** for freelancers, making the process significantly more

streamlined and less manual for all those working as freelancers for ITV. In 2026, we will deliver a programme of continuous improvement for 'non-employee' colleagues, starting with the development of a heat map to identify gaps and risks within our acquired labels (Indies) in relation to policies, procedures, templates, terms & conditions and other working practices. The aim is to improve the end-to-end experience for all UK freelancers.



During 2025, we continued to support the development of the new Creative Industries Independent Standards Authority (CIISA), actively contributing to the CIISA Standards themselves through representation on the Advisory Committee. All ITV productions, including those we commission, are required to meet the four CIISA Standards, which were developed through a broad industry-wide consultation process and include commitments to:

- Safe working environments
- Inclusive working environments
- Open and accountable reporting mechanisms
- A responsive learning culture

CIISA represents a step-change in accountability within the creative industries and an opportunity to track industry-wide trends. In 2025, ITV became a CIISA 'trailblazer' – testing how best to embed the CIISA Standards in



practice and understanding where gaps remain. In 2026, CIISA's own reporting mechanism is due to go live and ITV will play our part in making sure it is widely known about among our employees, freelancers and subcontractors.

At the end of 2025, ITV partnered with the Film and TV Charity (FTVC) to launch [The ITV Green Room](#), a pilot programme designed to support freelancers as they look for their next role. The initiative responds to recommendations in the FTVC's [Looking Glass report](#) and aims to create a way to offer connection and purpose for freelancers between roles. It involves bringing together freelancers in a peer network and providing industry mentors alongside events, training and workshops, covering topics from AI to CV clinics, as well as having access to work in the ITV offices one day a week. The pilot aims to boost people's skills, confidence and networks, bridging the challenging and isolating gaps between freelancers' roles, and

will also help shape and inform future initiatives to support freelancers.

In 2024 and 2025, ITV supported quantitative research conducted by the **TV Industry Human Rights Forum** and the University of Nottingham into cleaners, caterers, security guards and drivers used on UK TV productions. The project involved collaborating directly with three peer researchers who are themselves ancillary workers, ensuring lived experience informed the research design, engagement and analysis. The resulting report, [Every role matters](#), was published in June 2025.

Due diligence for ITV Sport

In 2025, we supported the continued iteration of a set of [common approaches for sports broadcasters](#) to address human rights through the Centre for Sport and Human Rights. This resource provides practical steps

to address human rights risks, including labour rights practices. It was sent out for consultation in 2025 and is due to be further tested and rolled out in 2026.

We have also built on the approach we developed for the Fifa World Cup in Qatar to prevent and mitigate modern slavery risks at other major sporting events. We have identified a range of human rights risks in advance of the 2026 Fifa World Cup which will be held across the USA, Canada and Mexico, and we have updated our due diligence questions for the companies providing ITV with drivers, security and hotels. We are developing our response and remediation plans for the event and engaging with key stakeholders, such as NGOs and trade unions, to support our approach.

Using our platform

In 2025 we used our platform to raise awareness of the complexity of slavery and trafficking issues.

On one of our flagship shows, *Emmerdale*, we ran a modern slavery storyline, working closely with The Salvation Army's anti-trafficking team who checked the script for accuracy and authenticity, drawing on those with lived experience. The writers used the opportunity to show how someone can be groomed and trapped in forced labour and the programme signposted viewers to modern slavery charities. As well as helping to raise awareness among viewers, the storyline generated adjacent coverage and discussion on ITV shows *Good Morning Britain*, *Lorraine* and *Loose Women*, and it was covered in the national press.

We have also highlighted modern slavery in our news coverage, covering under-explored aspects of this topic. For example, in



2025 ITV News journalist [Marina Jenkins investigated the extent of modern slavery](#), which included [video content](#) and a longer form [interview with Home Office Minister Jess Phillips MP](#) on the issue. In addition, ITV News journalist Julie Etchingham was shortlisted for best written broadcast piece dealing with modern slavery at the Human Trafficking Awards with her piece [Could AI stop livestreamed child abuse in its tracks?](#).



Due diligence in Workplace Services

We build relationships with all those providing services to ITV sites and follow up on pay queries and other labour rights with third party suppliers where there appear to be discrepancies. All Workplace Services managers have completed training on modern slavery and they ensure issues relating to labour practices are covered in quarterly meetings with suppliers. As well as managing our own buildings and contractors, ITV occupies a number of sites managed by landlords and we have a process to contact them to request information about their modern slavery due diligence practices and whether or not they are a Living Wage employer.

Merchandise

We have purchasing practices guidance for buying merchandise that aims to reduce the amount of merchandise overall. Where purchases are still required,

ITV buyers are asked to put sustainability and human rights considerations first and check that minimum criteria around the supplier can be met.

Raising concerns

There are various ways in which people can raise concerns at ITV. Our [Speaking Up](#) process is available for all workers to access should they have any concerns about labour rights practices. It applies to workers beyond direct employees and to those outside the UK. We are explicit in our Code of Ethics and Conduct and relevant policies that retaliation against, or victimisation of, anyone who raises concerns will not be tolerated.

We use Safecall, an independent third party, to provide a confidential Speaking Up telephone hotline and web-based reporting tool. The number is provided on daily call sheets at production sites and is offered in 175+ languages (see [Safecall](#)

[languages and countries](#)). Details of the process are also included in mandatory annual training for all employees, as well as for new joiners and freelancers at the start of each assignment. When a Safecall concern is raised, it undergoes an assessment by our Complaints Handling Unit (CHU) to triage and consider what action is appropriate, which can involve an informal review, an internal enquiry or a more formal investigation. Safecall reporters can communicate with the CHU via the Safecall portal on either a named or anonymous basis. Once appropriate action has been taken, feedback is provided to the individual who raised the concern.

Our People Relations team deals with employee relations issues, including freelancer concerns, and in the UK we have a Freelancer Complaints policy and process in place. The CHU handles complaints or concerns predominantly related to talent, programme participants/contributors and/or third party



production companies. We are now starting to support ITV's Indies with complaints and concerns raised and a full review of the operating model for the Indies will take place in 2026.

Every two years, we run a full Engagement Survey, which includes questions to measure trust and awareness in our Speaking Up processes. In 2025, 76% of our permanent and fixed term employment colleagues took part in our global survey and the results demonstrated that we have built a strong culture where: leadership is supportive; voices are heard; expectations are clear; inclusion is practised; and integrity is high.

We also run a group of employee networks which provide other avenues for people to raise labour rights concerns. These include the Ambassador Network comprising c.110 colleagues (c.22 of whom are international), who represent every department in ITV. We also have five employee networks:

the Women's Network, ITV Able, ITV Embrace, ITV Pride and ITV Balance.

In addition to our Speaking Up policy and employee networks, we ensure that colleagues can speak up through other mechanisms including:

- Informal conversations with line managers
- ITV's Talking Performance programme
- Employee Assistance Programme
- Talking to Human Resources
- Raising an issue with a member of the Executive Committee
- Raising a formal grievance

Our support for CIISA will provide another independent channel for people in the creative industries to report issues and concerns. CIISA has engaged widely with workers across the creative industries and is developing sector-specific guidance to support organisations like ITV to ensure they have accessible and effective reporting channels of

their own that safeguard workers from retaliation.

Beyond Speaking Up, we have collective agreements with colleagues in certain areas of ITV and we consult with the Broadcasting Entertainment Communications and Theatre Union (Bectu), Unite and the National Union of Journalists (NUJ). We see good relationships with trade unions as an important mechanism for people to raise concerns about their labour rights. The Joint National Union Committee, comprising representatives from these three unions and senior managers from the ITV People Team, meets four times per year.

In 2025, no incidents of modern slavery were flagged through our Speaking Up channels. We continued to identify and address opportunities to improve labour practices in our operations and supply chains.

Remediation

In 2025, ITV reviewed its crisis response and remediation mechanisms with a human rights lens. As a result, one member of the Executive Committee has had the following requirement added to their role card for crisis response: Lead on addressing people-related impacts and risks within the supply chain, ensuring a victim-centred approach.

In 2025, our due diligence processes did not uncover any cases of modern slavery and so we were not able to provide any remediation to those impacted directly by forced labour or child labour. Given the nature of our business, we believe it makes sense for us to remain focused on improving labour practices in TV production as the area where we can have the most significant impact. We also continue to review our processes to ensure that we are ready to respond appropriately in the event that we identify a case of modern slavery.

Training about slavery and human trafficking

Across the business there is annual mandatory online training which covers modern slavery and speaking up, among other topics, and reminds colleagues of the policies in place. This helps us ensure that the highest standards of safety are maintained and that an ethical lens and good judgement are applied when making decisions. In 2025, there was an 88% completion rate for all training modules across our employee population in the UK, Indies and International. This was a slight reduction on the previous year and a result of moving to a different platform for the UK, which impacted the overall timing and supporting communications. In 2026, we plan to streamline the content with the aim of driving engagement and completion rates.

Our People teams receive face-to-face annual training on modern slavery from an employment law firm. We also provide regular communications to all Approved

Engagers to ensure that they understand good labour practices and risks around modern slavery. Much of this is done via Google Classroom. We include modern slavery in our “Contracting our Workforce” training module for this group.

The Human Rights and Modern Slavery working group has access to an external subject matter expert who provides capacity building to individual departments on request. In 2025, this included a session with international Heads of Production.

All crew and freelancers working on our scripted productions and long-running non-scripted productions receive a presentation at the outset of the production, together with a VT by talent, that explains ITV’s Code of Ethics & Conduct on bullying, harassment, protected characteristics and behaviour on set, including the treatment of ancillary workers.

The TV Industry Human Rights Forum, which we support, develops and widely shares resources and tools for the whole industry to access, including many on labour rights. These have been developed following research and engagement with directly affected groups. The resources include free quarterly online training on understanding the basics of human rights risks in TV production.

In 2026, we will provide targeted training for Legal & Business Affairs teams to support consistent use of the ITV Studios risk platform and interpretation of human rights risk outputs.



Useful resources

[Social Purpose at ITV](#)

[Speaking Up Policy](#)

[Anti-Bribery Policy](#)

[Code of Ethics & Conduct](#)

[Diversity, Equity & Inclusion Policy](#)

[Climate Action at ITV](#)

Contact:

socialpurpose@itv.com

procurement@itv.com

Industry groups we are involved with:

Action for Freelancers

CIISA

Call It! App

Film & TV Charity

TV Industry Human Rights Forum

*This statement has been approved by the Board of
Directors of ITV plc on 24th February 2026.*



Carolyn McCall
Chief Executive

This statement relates to the ITV plc Group, including the
following key subsidiaries:

ITV Breakfast Limited
ITV Breakfast Broadcasting Limited
ITV Broadcasting Limited
ITV Consumer Limited
ITV Digital Channels Limited
ITV Studios Global Partnerships Limited
ITV Rights Limited
ITV Services Limited
ITV Studios Global Distribution Inc.
ITV Studios Global Entertainment B.V.
ITV Studios Limited
ITV Venturer Limited
ITV2 Limited
Moonage Pictures Limited
SDN Limited
The Garden Productions Limited
TwoFour Group Limited
World Productions Limited

