

ITV Modern Slavery Act Transparency Statement

*Working with our suppliers to
effect positive change in the world*

March 2024



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. Of those, the most salient risk for ITV is forced 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.

This is our eighth modern slavery statement in which we set out the steps we have taken during the 2023 financial year in support of this commitment, pursuant to the UK Modern Slavery Act (2015).

Our structure, business & supply chains

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.

We are also one of the largest independent producers in the world, creating, producing and distributing a broad range of programmes - we have over 50 labels in 13 different countries supplying over 200 channels or platforms. On top of this, our global formats and distribution business sells, commercialises and distributes our catalogue of formats and finished programmes worldwide. We have been growing internationally since 2012.

We are headquartered in the UK, with significant operations in the US, Netherlands, Australia, France and Germany. In 2023, the international labels became much more integrated into the business, working considerably more closely with central teams on issues such as safety, data privacy and duty of care.

- **Media & entertainment:** In the UK, ITV operates the largest commercial family of channels. We broadcast and commission news, sport, documentaries, entertainment, drama, comedy and children's programmes via our channels and on demand through platforms such as ITVX and BritBox. We also sell advertising space on these channels and platforms.
- **Production:** ITV Studios' main business is creating, producing and distributing high-quality content for broadcasters and platforms around the world. We make around 6,700 hours of original scripted and unscripted programmes a year, across 60 labels in 13 different countries, including the UK, US, Netherlands, France, Italy, Germany and Australia.
- **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, such as The Voice, internationally to independent third parties.
- **Brand and licensing:** ITV generates revenue directly from consumers through subscription video on demand (SVOD) on BritBox and ITVX, and by commercialising the 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, freelancers (mainly in TV production) and people working at ITV sites on behalf of our suppliers, including those in cleaning, maintenance and catering.

As of December 2023, we employed 6,640 people globally as full-time equivalent employees, 5,209 people in the UK and a further 1,431 people across US, Netherlands, France, Germany, Italy, Finland, Norway, Denmark, Sweden, Australia, Israel, Hong Kong and India. In the UK, we work with approximately 2,000-2,300 freelancers at any one time who are mainly involved in the production and broadcast of our TV programmes, as well as our contractor population.

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.

Within our media and entertainment division, we commission shows, where our main suppliers are production companies. Our broadcast operations focus on getting programmes to air or 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 our Studios division, the main activity is TV production, which includes supply chains for clothing, equipment, props, set construction materials, vehicles and support services such as 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.

Within distribution, brand and licensing, we have supply chains for merchandise and for putting on live events. ITV also enters into licences with third parties (licensees) for the use of ITV's intellectual property to create, produce and distribute consumer products by the licensees on their own account.

Policies in relation to slavery & 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 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 Speaking Up and Procurement Policies, together with ITV's commitment to equal opportunities, respect, dignity and understanding.

This approach is aligned to the UN Guiding Principles on Business and Human Rights.

The Code has been translated for all ITV's territories in International Studios production and communicated through ITV's Ambassador networks, senior management bulletins and CEO sponsorship to ensure that this is a 'tone from the top' message. It is included in all employee and freelance contracts.

Supporting the Code, we have policies and guidelines on holidays, sick pay, unpaid experience & placements, working conditions, disciplinary processes and speaking up. Each business area throughout our global operations has a dedicated Human Resources team to provide continuous support and guidance on all these policies. In 2023, we put a Head of People Policy in place, reflecting investment in the importance of policy for ITV and ensuring we have the right governance in place. We established a People Policy

Governance Framework, which includes sign off processes and policy change records. We also improved access to all our policies and developed guidelines and FAQs to support teams in implementing them effectively.

Since 2014, ITV has been accredited by the Living Wage Foundation as a voluntary Living Wage employer in the UK. This means that we pay all colleagues (permanent and fixed term employees including apprentices, freelancers, contractors and agency workers) as a minimum, the hourly rate set independently and updated annually by the Living Wage Foundation, which is higher than the Government's National Minimum Wage and National Living Wage rates.

We undertake monthly checks on all UK employees of ITV using an automated report from the HR / Payroll system. Where there are any issues, such as someone receiving an hourly rate below the appropriate Living Wage, this is rectified in

the next payroll run and backdated to the relevant effective date, with new contractual paperwork issued accordingly.

We have also standardised all our agreements so that anyone employed or contracted by ITV via a third-party organisation will receive the Living Wage. The Living Wage is a route to encouraging social mobility and access to the industry, particularly in higher cost of living locations. We do annual checks across key suppliers to ensure that increases in rates are applied.

In 2023, we began exploring how we could support pathways for prison leavers and ex-offenders into employment. Those leaving prison are vulnerable to exploitation if decent work opportunities are not available to them or they are excluded from labour markets, so we see this support as an important mechanism for preventing future modern slavery.



PRODUCTION COMPANIES

Where we have direct control of a production company or a majority stake, we require them to adopt our policies and procedures including those in relation to [modern slavery](#) as set out in ITV's Code of Ethics and Conduct. They are also required to adopt the inclusion of anti-modern slavery precedent clauses and general warranties in contracts with suppliers and business partners.

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 align with the ILO core conventions. 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 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. Implementation of our Supplier Code of Conduct is supported by a Third-Party Risk Management framework.

We have purchasing practices guidance for buying merchandise and mass-produced products, which aims to reduce the amount of merchandise overall. Where merchandise is required, ITV buyers are asked to put sustainability and human rights considerations first and check that minimum criteria around the supplier can be met.

Our Procurement Policy provides guidance to colleagues in assessing risks when bringing in new suppliers and points to specialist expertise across the business.

Due diligence processes

IN RELATION TO SLAVERY & HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAINS

APPROACH TO RISK MANAGEMENT

Across ITV, business divisions own the management of their risks and are responsible for:

- Identifying and reporting local risks
- Maintaining risk registers and business continuity plans where appropriate
- Implementing mitigating actions and controls

Business divisions are supported by Group Functions, which include Group Risk, Legal and Compliance, Health and Safety, Procurement, Human Resources and Workplace Services. Identified risks are assessed and reported in line with ITV's Risk Management framework.

The Human Rights & Modern Slavery Steering Committee meets quarterly to review human rights and modern slavery risks and set priorities. A larger Human Rights & Modern Slavery Working Group, comprising senior

representatives from multiple relevant functions, meets quarterly and is responsible for implementing mitigations and reporting back on progress. The Compliance and Ethics team maintain a central repository of documents reporting on activities from around the business. This approach allows us to identify key risks, highlight mitigating factors and potential gaps in control. Emerging risks are reviewed and addressed throughout the year. ITV's approach to human rights and modern slavery is overseen by the Board's Audit and Risk Management Committee.

In 2023, we established a separate Risk and Compliance Sub-Committee to review a variety of risks emerging in the operating practices of the business, including in relation to modern slavery risk. The Risk and Compliance Sub-Committee has responsibility on behalf of the Management Board for overseeing critical risk areas and where they cross over. During the year, there were no modern slavery issues or incidents escalated to this committee.



DUE DILIGENCE ON 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 are experiencing conditions of modern slavery. Where we use agencies, these are only for technical and highly skilled roles. We also provide a range of opportunities for people to raise concerns about themselves and others, which is an important process through which ITV can get early warning of potential issues.

While we do not see modern slavery as a risk in our own workforce, we recognise that it is at one end of a spectrum of labour practices with decent work at the other. Our focus therefore is to strive for decent work and to address any labour issues we identify that fall short. In 2023, we strengthened our leavers process, conducting interviews in person wherever possible and flagging concerns or complaints with the relevant HR Business Partner. We have increased the visibility of those on work experience across

the business and we have also made significant strides in improving our analysis of human capital management, with richer human resources data now available. In 2024, we will improve our information on recruitment and make our right to work checks more efficient.

TV production and broadcasting relies on engaging freelancers and subcontractors. Teams of people come together for the time it takes to make a programme or deliver a project and then they move on to other programmes, sometimes with ITV and sometimes with other production companies. In our UK operations, only Approved Engagers can book freelancers. To become an Approved Engager a person must complete mandatory training which includes content on labour rights and the importance of the Living Wage. All Approved Engagers must complete annual refresher training.

The freelance nature of engagement in the TV industry can be both a benefit to workers, in terms of flexibility, and a challenge, due to the

unpredictable nature of assignments. In 2023, the precarious nature of freelance work was a particular issue across the TV industry, with BECTU reporting in September that 75% of film and TV freelancers were out of work.

Early in the year, ITV committed to the Coalition for Change Freelance Charter to improve the situation for freelancers and we have since worked to identify how best to implement its requirements. In 2024 we plan to put a series of improvements for freelancers into place, ensuring the best possible experience when they join, work, leave and return to ITV.

SUPPLIER DUE DILIGENCE

Our centralised procurement function supports all ITV's UK operations and operates a list of pre-approved suppliers. Our policy is for Procurement to get involved for all new supplier engagements with a value over £100,000 or where risk is considered high to ensure appropriate pre-qualification

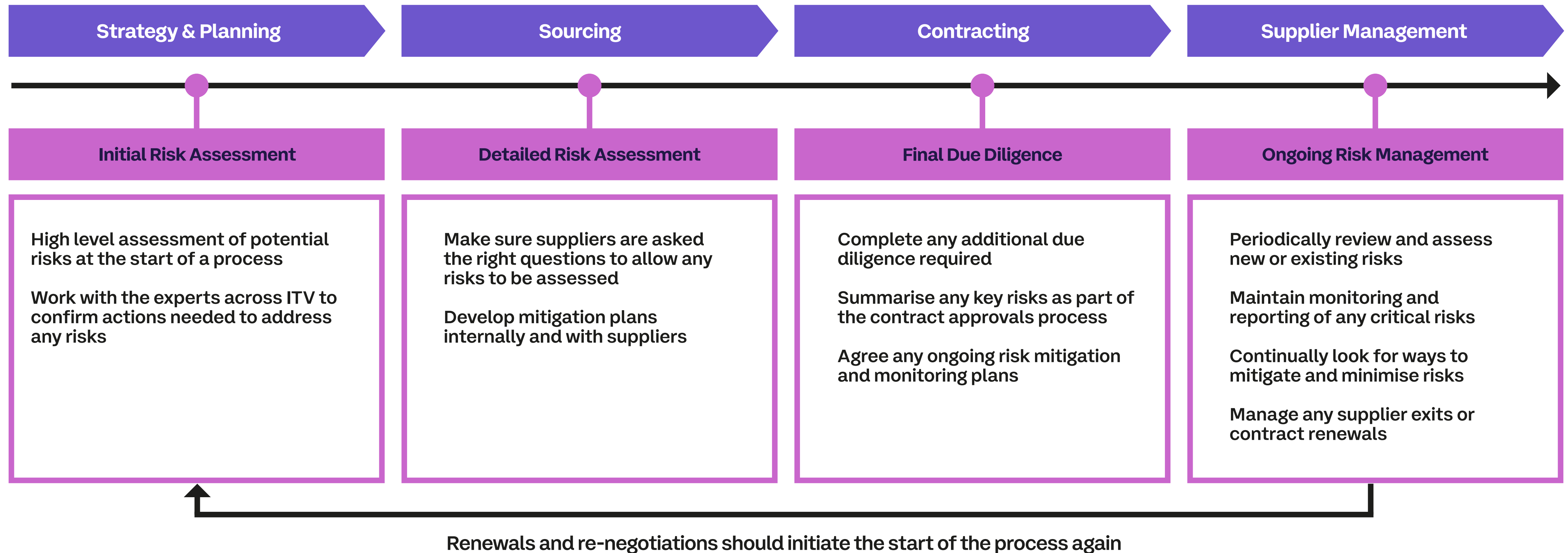
questions are answered and evaluated. Our Third Party Risk Management approach includes questions that cover a broad range of risk domains, including modern slavery.

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, tax evasion, human trafficking and modern slavery does not take place in their organisations or their supply chains;
- Notify ITV if they become aware of any violations; and
- Allow ITV to audit them to ensure that they are complying with modern slavery laws.

Summary of ITV's Third Party Risk Management Approach

KEY STAGES IN THE THIRD PARTY RISK MANAGEMENT PROCESS





Where issues are identified, 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 summary termination is likely to exacerbate the risk to already vulnerable workers and therefore in these circumstances we would seek to work with suppliers to deliver compliant practice and use termination as a last resort.

In 2023, we worked on refining the questions in the due diligence process and improved our systems to provide greater insight and reporting into supplier risk and mitigation. During the year, 185 suppliers went through enhanced due diligence after being identified as potentially high risk or as part of a tender or reassessment process. Of those, 90% agreed to ITV's supplier code of conduct, with the rest having their own codes and policies in place, which we reviewed to ensure they align with our approach. In addition, more than 60% had an identified person in charge of modern slavery in their business and 55% said that they had conducted their own modern slavery assessments.

Part of our checks include asking "Do you employ low cost (i.e. minimum or living wage) or zero-hour contract workers in your business or the supply chains that directly support the products or services being supplied to ITV?" Of the potentially high-risk suppliers, 95% stated they had no low-cost labour or zero hours workers in their operations and no concerns were identified for the remaining 5%.

In 2023, our due diligence process did not uncover any issues or incidents of concern and we did not turn away any suppliers as a result of modern slavery risks. We conduct bespoke deep dive assessments on suppliers or areas of concern as an effective approach to understanding risk.

In 2024, we will refine our supplier onboarding processes to further help identify potential modern slavery risks and formalise our corrective action processes. We will also continue to gather more data and insights from our processes to inform any future deep dive assessments or preventative actions.

MEDIA AND ENTERTAINMENT

We know that the way we commission television programmes can have an impact on the labour practices of production companies and their treatment of suppliers. Therefore, we use our commissioning process to encourage best practice. For initial agreements with producers or labels, we put them through a due diligence process and onboard them into ITV's policies and requirements.

Our pre-commissioning processes include due diligence around payment of the Living Wage and checks to identify any higher risk commissions and suppliers. Where increased risk is identified further due diligence is undertaken by Procurement and the commissioning decision is escalated to the Commissioning Editor. ITV's commissioning requirements stipulate that production partners must pay, as a minimum, the Living Wage to eligible employees and freelancers and the National Minimum Wage to volunteers, apprentices and trainees. Our commissioning agreements include equivalent provisions on modern slavery to those included in ITV's standard terms of engagement.



STUDIOS

For productions, our risk management programme focuses on developing the right behaviour and aims to ensure that those in the business making decisions on the ground are empowered to understand, own and manage the risks in the making of their content and are provided with the support and expertise to enable them to achieve this. This allows us to understand whether our policies and good practices are truly embedded and implemented. The focus is on encouraging openness and a culture of raising issues, gathering emerging themes and sharing lessons to drive continuous improvement. The programme is supported by a strong focus on reporting risks and concerns, a culture of speaking up and a [Duty of Care Charter](#) for all those involved in a production.

We know that some of the supply chains into productions are at higher risk for modern slavery and labour exploitation and, alongside other broadcasters through the TV Industry Human Rights Forum, we are improving our understanding of the extent of these risks in our industry. Many of

the support services are provided through companies that specialise in supporting TV production, although there are occasions where production companies will need to find local non-specialist suppliers to meet their needs. To address the risks, we encourage our productions to engage suppliers from a pre-approved list, most of which have undergone human rights due diligence and been through the third-party risk management framework outlined above. In 2023, we launched an ongoing project on global framework deals for unscripted suppliers, working towards ensuring that all our international productions can access suppliers that have strong modern slavery clauses in place.

We operate an enhanced risk assessment and due diligence process for ITV Studios' produced content that is made in a high-risk jurisdiction. All productions are tracked through a central database so that we know the stage that productions are at and their location. It is mandatory for every new production globally to complete an online Risk Notification Form which helps us to understand inherent risks including those related to modern slavery, among

other issues, and to prioritise those productions that need additional support. The information triggers central support teams to look into key issues. High risk locations, based on the Global Slavery Index, are flagged to the Legal and Business Affairs team who proactively contact the productions to ensure that they have put the right modern slavery checks in place. On a monthly basis this information is reported to the ITV Studios Operational Risk Group which decides on the suitability of the mitigations in place, with high-risk productions escalated to the Studios Board. In 2023, there were 16 productions flagged as high risk in relation to modern slavery. In 2024, we aim to improve this assessment to ensure that we capture all possible risks.

In 2023, ITV has also been using tools developed by the TV Industry Human Rights Forum as part of its due diligence on Poland as a possible country for TV production. These have included an understanding of potential labour rights risks. There are no productions yet underway but plans are in place for further checks when they are.

Parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk

In 2023, ITV has continued to focus on three priority areas in which to build understanding of potential slavery and trafficking risks:

1. Workplace services
2. TV productions, including sport
3. Merchandise and events

WORKPLACE SERVICES

ITV directly employs people to deliver workplace services which include reception services, logistics and mechanical & electrical at our hub buildings in London, Leeds, Manchester and Preston, as well at the sites used for filming Coronation Street and Emmerdale. We work with suppliers for security and catering, mechanical & electrical and cleaning services 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).

We build relationships with all those providing services to ITV sites and have followed up on pay queries with third party suppliers where there appear to be discrepancies. For example, in 2023, we checked all the drivers used by a company that rents its fleet of vehicles to ITV Studios before they were allowed to start work.

As well as managing our own buildings and contractors, ITV uses a number of sites managed by other landlords. During the year,

we contacted all landlords to request information about their modern slavery due diligence practices on facilities staff and to ask about whether they pay living wage. We are using their responses to determine whether any additional due diligence is necessary and continue to share best practice with those landlords that have fewer checks in place. In 2023, we completed several construction projects and have now paused further building work. Where we have completed moves and refits, and in support of our wider environmental and human rights commitments, we have reduced our reliance on supply chains for new products by purchasing second-hand goods and reusing as many materials as possible, including under-floor systems, furniture, carpet tiles and many white goods.



TV PRODUCTIONS, INCLUDING SPORT

TV production covers our own business operations, through the shows that ITV Studios makes and broadcasts, and our supply chains, where we commission or buy shows from independent production companies. Through our own due diligence work and our involvement with industry bodies, we have identified that modern slavery risks predominantly relate to ancillary services that we contract and where we have less oversight or control, such as cleaning, catering, security, driving and hospitality.

For unscripted long-running shows, such as The Chase, ITV uses production ‘MOTs’ to look at the working culture and identify any issues that need addressing. These are deep-dive programme reviews that involve interviews with those working on productions and site visits. Since mid-2022, we have conducted five production MOTs and found no red flags that could indicate modern slavery. We also added human rights due diligence awareness into the risk profile for productions and reinforced the use of the [The Whole Picture Toolkit for Mentally Healthy Productions](#), developed by

the Film and TV Charity. In 2024, we aim to better integrate human rights and modern slavery issues into start-up forums for productions. These meetings act as a prompt for everything that productions should be taking into consideration.

ITV Studios has been working in partnership with the [Call It!](#) app since September 2022. The app enables our labels and individual productions to monitor the safety and wellbeing of their staff, freelancers and ancillary workers by asking, “How were you treated at work today?” It gathers anonymous data regarding health and safety, safeguarding, working conditions and experiences of bullying, harassment and discrimination, providing a temperature check of how people are feeling on production. Since an initial pilot, more than 70 productions have used the app, creating a mechanism to signpost people to further resources for support and the means to address concerns more formally. ITV Studios is delighted to be working with the team for a further year and will be making every effort to increase its use across all scripted and unscripted productions.

We continue to support the [TV Industry Human Rights \(TVIHR\) Forum](#), which focuses on understanding and addressing human rights risks in TV productions, by conducting research and developing tools and guidance which are then shared freely with the whole sector. In 2023, we participated in Forum meetings that covered issues such as working internationally with local crew and ancillary workers. We shared insights, learned from other organisations and provided speakers, including to the Centre for Sport and Human Rights’ Sporting Chance Forum on our experiences of conducting human rights due diligence in advance and during the FIFA World Cup in Qatar. In addition, we applied the lessons and due diligence approach developed for Qatar to our operations at the Rugby World Cup in Paris.

Finally, we use our platform to raise awareness of the complexity of slavery and trafficking issues and have highlighted it in our news coverage, covering under-explored aspects of this topic. For example, [“We have no choice: The Vietnamese dying for a chance to work in the UK”](#).

Case Study

SUPPORTING OUR CLEANERS

Ancillary workers, such as cleaners and security guards, are essential to the running of a TV production. ITV employs such workers through third party companies, with which we contract. We have worked to build strong relationships with our ancillary workers and ensure good lines of communication are open to them.

Because of our approach, two cleaners at one of our studios felt comfortable to flag to an ITV colleague that their employer had moved them onto zero hours contracts and that as a result they did not receive holiday pay. ITV did not have any legal responsibility to address this as the cleaners were directly

employed by a third party. However, the cleaners had worked regularly at the same studios for a number of years and were valued members of the ITV team.

ITV met with the cleaning management team to understand available options, particularly given that the studio was not always in use for productions so full-time employment was not possible.

As a result, the third-party employer agreed to move the cleaners onto permanent part-time contracts of 30 hours plus holiday pay, giving them considerably more certainty about their income.



MERCHANDISE

ITV sources merchandise through third-party suppliers, develops tours and live experiences and licences partners for merchandise deals, such as board games and collectibles.

ITV's own merchandise purchases are a relatively small proportion of overall spend but we have recognised this category as a high-risk area and we work to engage teams that place orders for merchandise to ensure they have understood and mitigated modern slavery risks. In 2023, we developed a new internal website for merchandise that is due to launch early in 2024. It includes a social purpose section and shows the location from where goods are sourced, which is part of our approach to engage employees better on responsible sourcing practices. This is also enabling the business to switch out regularly bought items from high-risk locations. Our merchandise guidance aims to reduce the overall amount of merchandise purchased and to promote use of the ethical ranges where purchase is necessary. ITV's spend on merchandise

has reduced since 2018/2019 but has remained flat for the last two years.

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 and ITV does not typically have a role in managing the creation and manufacture of the products, 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 be for modern slavery in terms of geography and business activity. ITV has a right to audit compliance with the licence agreement and, under the new third-party risk management process, Procurement facilitates enhanced due diligence on all high risk third parties. In 2024, we aim to improve our human rights due diligence of licensing and sponsorship arrangements.

Training about slavery and human trafficking

REGULAR TRAINING

Across the business there is annual mandatory online training which references modern slavery and Speaking Up, among other aspects, and reminds colleagues of the policies in place. This helps us ensure that the highest standards of safety are maintained and that ethical and good judgement is applied when making decisions. In 2023, there was a 95% completion rate for all training modules across our UK and international population. For 2024 we are further strengthening our education programme on modern slavery and labour issues with the development of a dedicated mandatory module on human rights, including modern slavery and labour issues, which is due to be launched to all employees and freelancers globally in 2024.

Our Human Resources teams receive 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.

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

In 2023, ITV's international heads of production received bespoke training on human rights and modern slavery risks. A further 14 individuals from across ITV's production community attended training on this topic provided by the TV Industry Human Rights Forum.

Measuring our performance

IN 2023, WE DEVELOPED AND TRACKED A SERIES OF KEY PERFORMANCE INDICATORS RELATING TO OUR WORK ON MODERN SLAVERY:

What we are measuring	How we are measuring it (KPI)	Performance in 2023
Awareness of modern slavery by employees through annual mandatory online training	Completion rate of annual mandatory online training (global figure)	90%
Ability to raise concerns through the Speak Up process	Percentage of employees who agree or strongly agree that "I know how to speak up and raise concerns"	89%
Implementation of our Living Wage commitment (UK)	Percentage of our fixed-term and permanent workforce on the real Living Wage (as at Dec 2023)	2.8%
Due diligence process for new suppliers	Number of suppliers going through further due diligence as a result of elevated modern slavery risk	185
Risk assessment of productions	Number of ITV productions which triggered further due diligence as a result of a raised risk of modern slavery	16
Potential incidents of modern slavery	Number of concerns raised about potential modern slavery through our Speak Up channels	0

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PROGRESS ON COMMITMENTS MADE IN PREVIOUS STATEMENT

Business area	Commitments made in 2022 statement	Progress made in 2023	Commitments for 2024
GOVERNANCE	None	Established a new Risk and Compliance Steering Committee to oversee major risk areas and where they cross over.	Launch standalone mandatory training module on human rights for all employees and freelancers globally.
TV PRODUCTION	We will continue to roll out the Call It! App and we plan to embed ongoing training for productions on working conditions and modern slavery through a standalone module, targeting both ITV production staff and the freelance community.	Training module developed for all staff and freelancers (beyond those working in production). Call it! App rolled out to more than 70 productions since launch.	Integrate human rights and modern slavery considerations into start-up forums for productions.
WORKPLACE SERVICES	We will explore current best practice to mitigate modern slavery risks in the supply chains for electric vehicle batteries and solar panels.	Reviewed risks and used the Corporate Human Rights Benchmark to help select a supplier for mobile gallery vehicles; incorporated modern slavery issues in the tender pack for future projects.	Investigate further the data provided by our landlords and how they evidence the responses from their own third-party suppliers.
MERCHANDISE AND EVENTS	We will continue to communicate our merchandise guidance and processes internally.	Developed a new internal website showing sourcing information for merchandise purchases.	Embed human rights due diligence into licensing and sponsorship division.
PEOPLE	We will extend access to our Employee Assistance Programme to freelancers and their dependents.	Freelancers and their dependents now have access to our Employee Assistance Programme.	Improve data on all our people to help identify and manage risks and implement a series of improvements for freelancers as per our commitment to the Coalition for Change.
PROCUREMENT	We will undertake system improvements to increase insight and reporting into supplier risk and mitigation.	Achieved phase 1 of system improvements and now can track better information about our higher-risk suppliers.	Further refinement to supplier onboarding and risk management systems including issue resolution processes.



RAISING CONCERNS

An important mechanism for tracking our effectiveness is through grievance channels and there are a range of ways that 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 reprisals 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. 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 concern is raised, it undergoes an assessment to consider what action is appropriate, which involves an informal review, an internal enquiry or a more formal investigation. Once this is complete, feedback is provided to the individual who raised the concern.

In 2023, we measured awareness and trust in our Speaking Up process through an engagement and culture survey. This found that 89% of colleagues agree or strongly agree that they know what types of concerns they should raise and the same percentage know how to speak up and raise concerns. In 2024, we will run workshop sessions to continue driving increased confidence in speaking up processes.

In addition to the Speaking Up policy and the engagement survey, colleagues can speak up through a variety of mechanisms including:

- Informal conversations with line managers and ITV's Talking Performance programme
- Employee Assistance Programme
- Talking to Human Resources
- Raising an issue with a member of the Management Board
- Raising a formal grievance
- Talking to their ITV's Ambassador Network representative

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. We are supporting the creation of the Creative Industries Independent Standards Authority (CIISA), which aims to uphold and improve standards of behaviour across the creative industries and to prevent and tackle all forms of bullying and harassment, including bullying and harassment of a discriminatory nature. Internally we have a group of employee networks which provides other avenues for people to raise labour rights concerns. These include The Ambassador Network comprising 105 colleagues (20 of whom are international), who represent each and every department in ITV. We also have five employee networks: The Women's Network, ITV Able, ITV Embrace, ITV Pride and ITV Balance.

In 2023, we reviewed our Grievance and Freelancer complaints process to ensure it

is aligned to our Speaking Up policy and that the options people have for raising concerns are clearly explained.

In 2024, we will be introducing a centralised and dedicated team within the People function to support complaints and issues raised. We also encourage suppliers to raise concerns with us, either through their ITV contact or via the Speaking Up channels. In particular, we expect suppliers to notify ITV and work together to remediate any incidents of modern slavery, as set out in our Supplier Code of Conduct.

In 2023, we did not identify any specific incidents of modern slavery despite a strong focus on areas of concern and no potential incidents were flagged through our Speaking Up channels. We continued to identify and address opportunities to improve labour practices in our operations and supply chains.

*This statement has been approved by the Board of Directors
of ITV plc on 8 February 2024.*



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 Distribution Ltd
ITV Rights Limited
ITV Services Limited
ITV Studios Limited
ITV2 Limited
SDN Limited



Useful Resources

Standards and Social Purpose Goals

[Speaking Up Policy](#)

[Child Safeguarding Policy](#)

[Duty of Care Charter](#)

[Environmental Goals](#)

[Anti-Bribery Policy](#)

Contact

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