

## Modern Slavery Act Statement

### Introduction from the Chief Executive, Simon Fox

Trinity Mirror is committed to ensuring that there is no slavery or human trafficking within our supply chains or in any part of our business. This is the first slavery and human trafficking statement issued by Trinity Mirror plc, prepared on behalf of itself and its subsidiaries which form the Trinity Mirror Group ("TM"). Following the introduction of the Modern Slavery Act 2015 (the "Act"), we set out below the steps already taken to ensure modern slavery or human trafficking does not appear in TM's supply chains.

We look forward to building on our work in this area in future years.

Simon Fox  
Chief Executive  
15 May 2017

### Our Structure

We are the largest news publisher in the UK with national and regional news brands across the country, including brands such as the Daily Mirror, Sunday Mirror, Sunday People and Manchester Evening News. Our brands have a long heritage as a trusted source of news and information with our editorial conviction and high standards of journalism.

Our business is split into four operating divisions: Publishing, Printing, Specialist Digital and Central.

- The Publishing division contains all of our national and regional newspaper titles and associated digital publishing sites, with our commercial team working with media agencies and advertising clients to help them reach the national, regional, print and digital media audiences of the Trinity Mirror news brands.
- Printing provides print distribution services to the Publishing division and externally to third parties through five print sites.
- The Specialist Digital division operates our digital recruitment classified business, and our digital marketing services business.
- Central includes revenue and costs not allocated to the operational divisions and our share of results from associates.

### Our Supply Chains

Our main supplier sectors include paper, contracted printing, product distribution services and waste management and recycling. We also engage suppliers of IT and communications services, cleaning, catering and other facilities management services.

As our list of suppliers is many and spread over a wide geographical area, we established a working group consisting of relevant senior managers from across the business who conducted an assessment of existing UK and overseas suppliers. The suppliers chosen for review had provided services to TM in the previous twelve months and were categorised in accordance with their potential exposure to risk and potential infringement of the requirements of the Act. The process included identifying and mapping our supply chains allowing us to review the regions in which our

suppliers operate. We applied a risk based methodology to assess the likelihood of modern slavery occurring in each of the organisations, which included assessing factors such as the origin of manufacture, the location from which the services were provided and the nature of those services and/or goods. Applying such criteria in turn allowed us to tailor due diligence to confirm the risk based assumptions.

#### Due Diligence processes for Modern Slavery and Human Trafficking

To identify and mitigate the identified risks, the terms and conditions for new suppliers were updated. TM now requires, as part of the on-boarding process, confirmation of supplier compliance with the Act.

Existing UK suppliers (identified as lower risk from a modern slavery perspective) were issued with appropriate statements outlining their obligations under the Act. TM is willing to engage with suppliers on a case by case basis and will escalate any issues to Senior Management in order to agree a resolution with the supplier that is beneficial to each party and satisfies the requirements of the Act. All responses are considered, logged and reviewed by the appropriate function.

Each non-UK supplier (identified as higher risk from a modern slavery perspective) was asked to sign a self-certification to confirm that the organisation has in place appropriate due diligence procedures designed to ensure that slavery and human trafficking is not taking place in any part of the business or that of its supply chain. The responses are monitored on an ongoing basis. If a supplier fails to return the requested self-certification an escalation process will be undertaken and reviewed on a case by case basis. This will include a follow up letter with a response deadline, followed by a final notice. TM reserves the right to cease engagement with a supplier who cannot confirm compliance and who does not show willingness to comply with the Act.

TM's policy on slavery and human trafficking as applicable to suppliers is contained within the Procurement Policy. We expect our suppliers to adhere to the requirements of the Act and we will undertake all reasonable and practical steps to ensure that these standards are implemented within our supply chain.

To date, TM has not identified any modern slavery concerns during the 2016 review.

#### Our Policies on Modern Slavery and Human Trafficking

In relation to our own business, the Group has in place Standards of Business Conduct, which are read in conjunction with employees' contracts of employment, which apply to all employees within TM. Our existing policies set out our commitment to ensure there is no slavery or human trafficking in any part of our business as well as our supply chains. Our staff are issued with our standards of conduct when on-boarded and this aids promotion of our ethical standing within the business.

Senior management undertake an annual risk certification exercise which gives assurance from the business that internal processes and controls remain effective. This process includes procedures for reporting any significant control failings including non-compliance with laws and relevant regulations.

#### [Summary of Procurement Policy](#)

## Effectiveness and ongoing compliance

The working group will meet throughout 2017 in order to monitor controls implemented in 2016 and continue TM's due diligence process around its supply chains. TM will periodically assess the suitability and effectiveness of the process and report on progress in its annual Modern Slavery and Human Trafficking Statement.

We expect our suppliers to engage with us in a constructive and responsible way in order to resolve any issues in a timely manner. TM reserves the right to refuse to on-board a supplier who is unable to demonstrate their policies on, and willingness to comply with, the Act.

As part of TM's ongoing compliance with the Act, we will seek annual assurance as part of the procurement process that new suppliers have provided assurance of their compliance with the Act.

We will undertake to periodically review identified higher risk suppliers and if necessary seek further evidence of their compliance with the Act on behalf of their organisation and suppliers.

As the inherent supplier risks change over time we will review and update our policies and approach to ensuring TM's supply chain is free from slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Trinity Mirror Group's modern slavery and human trafficking statement for the financial year ending 1 January 2017.

Approved by the Board of Directors of Trinity Mirror plc

Simon Fox  
Chief Executive  
15 May 2017