

**Corporate Social Responsibility Policy**  
**National World plc**

## **Introduction and Overview**

The Board has the absolute objective of always acting as a fair and reasonable employer. The Board also acknowledges and is keenly aware of our responsibilities to the many communities we serve: our readers, customers, suppliers, shareholders, other stakeholders and to the environment.

Because of our key role in the community the company strives to set a leading example in how it manages its activities for its internal and external stakeholders and uphold a high standard of corporate social responsibility.

## **Responsibilities**

The Board is accountable for the overall standard of Corporate Social Responsibility and will report progress to our shareholders via the Annual Company Report and Accounts. The Board has delegated the day to day responsibility for all matters related to Corporate Social Responsibility and social issues to the Executive Directors.

Specific responsibility for any environmental issues has been delegated to the Executive Chairman, with assistance from the Chief Operating Officer and the Group Health, Safety and Compliance Director.

Responsibility for formulating, updating and ensuring adherence to Group policies and relevant legislation has been delegated to the Chief Operating Officer.

Each local Business Lead Manager has responsibility within their operation for relationships with customers, suppliers and the community. Certain material and services are sourced centrally such as technology and legal and professional services and these arrangements are subject to review by either the Group Technology Officer or Chief Operating Officer.

All employees are personally responsible to act in a manner consistent with the spirit and intent of the policies below, and act in good faith, and as ambassadors of the company at all times in their dealings with the wider community in which we serve.

## **Policies and Practice**

The details of how the activities of the company will be managed to maintain a high standard of Corporate Social Responsibility are set out in the Environmental Policy embedded below and the various internal policy documents that are subsequently referenced.

## **Environmental Policy**

The company is an industry recognised company within the digital media market sector.

Located at various sites across the UK the Group own a total of 13 daily newspapers, 125 weekly paid for and 3 free newspapers, (a number of papers are currently out of print due to the Covid pandemic) a number of glossy lifestyle magazines and smaller specialist publications. Titles are printed by third party printers to maximise on distribution and logistics. Where possible, we ask that all third party recognised printers have ISO accreditations and policies.

We have considered the process of our activities; and we undertake to minimise the environmental impact and protect the environment when producing our products and service.

Our principal environmental commitments are:

- Continually developing the management system, implementing and maintaining policies and procedures to assess and monitor the environmental impact of our operations and to enhance our environmental performance.
- A commitment to comply with applicable legal and other Environmental compliance requirements. We use various methods to monitor compliance for example. ESOS, “The Environmentalist” and IEMA.
- Communicating regularly with all our interested parties; which include employees, customers and suppliers, on matters of environmental policy and procedure. We communicate through managers’ briefings to staff, notice boards, through our company Intranet, our external internet, and through the senior management team, briefing the shareholders and Board on progress and updates. This is usually through our Group Health, Safety & Compliance Director.
- Continuously improving by setting and meeting annual performance targets.
- Supporting and empowering our employees to meet the policy requirements.

Furthermore we agree to:

- Promote an environmental agenda within the business.
- Prevent pollution or nuisance that may be caused by our activities where practicable and protect the environment.
- Use energy and natural resources efficiently and reduce consumption where possible.
- Minimise the generation of waste and dispose of unavoidable waste in a responsible manner.
- Consider the environmental implications of changes to products, processes, materials and facilities when business decisions are made.
- Continually improve our environmental performance through the setting and reviewing of realistic and achievable objectives and targets.
- Provide appropriate resources for the continuous improvement of this policy.
- Apply the principles of reduce, reuse and recycling to our operations, products and services where possible.

Directors, Management and Supervisory Staff have responsibilities for the continuous improvement of the policy and must ensure that environmental issues are given adequate consideration in the planning and day-to-day supervision of all work.

All Employees and Subcontractors are expected to adhere to this policy, whilst ensuring that their own work, so far as reasonably practicable, is carried out without risk to themselves, others or the environment. This includes cooperating with management on any environment-related matter.

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement sets out the company’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the current year as well as ongoing actions.

National World is committed to operating all of its Group’s business activities to the highest standards of business ethics and integrity. We are committed to understanding more about modern slavery and ensuring there is no modern slavery concerns in our business or supply chain.

## **Organisational structure and supply chains**

The Group is one of the largest multi-media organisations in the UK. We provide news and information services to communities through our extensive portfolio of hundreds of publications and websites.

The organisation currently operates only in the UK.

Our supply chain consists of:

- Freelance editorial suppliers based predominantly in the UK;
- Large and small technology suppliers based in the UK and world-wide;
- Awards and live events suppliers based predominantly in the UK;
- Print and logistics suppliers based predominantly in the UK and other suppliers of business services based predominantly in the UK.

## **Supply chain risks**

The Group's suppliers are mostly based within the UK which has a developed culture of ethical business practice and strong labour regulation. We have therefore assessed the overall risk of the Group contracting with organisations that engage in slavery or human trafficking as relatively low. However, we have recognised that a risk in our supply chain exists where the Group contracts with technology suppliers based overseas.

## **Acts to address risks**

We are undertaking the following activities on an ongoing basis to assess and address these risks:

- Conducting an internal risk assessment to identify which of the Group's suppliers are most likely to manufacture goods or provide services in countries and/or sectors where modern forms of slavery are more likely to be prevalent;
- Consulting with those suppliers whom we have identified as presenting significant inherent risk in order to understand more about their own businesses, supply chains and the steps they have taken to reduce the risk of slavery and human trafficking;
- Reviewing the Group's existing contractual arrangements and identifying ways these can be strengthened to further reduce the risk of slavery and human trafficking in our businesses and supply chains; and
- Providing anti-slavery training to key staff in accordance with the Modern Slavery Act 2015.
- We will continue to monitor the Group's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place in the Group's supply chain and/or businesses.

This statement will be reviewed and updated annually.

Our risk assessment to identify our core suppliers is:-

Any business that is located in a third world, or outside the UK, with high staff volumes and/or high staff turnover. Additionally, we have identified any company in the UK that has a high number of staff (agency or non contracted staff) and potential low paid (minimum wage) staff. (e.g. cleaners from an external contractor).