

Slavery and Human Trafficking Statement of The Scott Trust Limited (the “Scott Trust”), The Scott Trust Endowment Limited (“STEL”), and Guardian Media Group plc (“GMG”) for the year ended 31 March 2025

This statement is made pursuant to the Modern Slavery Act 2015 (the “MSA”). It sets out what the Group has in place to ensure that slavery and human trafficking is not taking place in supply chains or in any part of the business.

Organisational structure, business and supply chains

The Scott Trust’s core purpose is to secure the financial and editorial independence of the Guardian in perpetuity, with subsidiary aims to champion its principles and to promote freedom of the press in the UK and elsewhere.

The Group comprises The Scott Trust Limited (the “**Scott Trust**”), The Scott Trust Endowment Limited (“**STEL**”) and Guardian Media Group plc (“**GMG**”), and their subsidiaries.

The Scott Trust is the parent of the Group and is charged with securing the financial and editorial independence of the Guardian in perpetuity and safeguarding its journalistic freedom and liberal values, free from commercial or political interference.

The Scott Trust is the sole shareholder and ultimate owner of GMG, the operating business responsible for the publication of Guardian journalism on a global basis.

The Scott Trust is the sole shareholder and ultimate owner of STEL, the investment business that owns a portfolio of investments which are held to generate returns to secure the long-term future of the Guardian.

The Guardian produces high-quality journalism, funded through a combination of contributions, memberships, subscriptions and advertising. The journalism has a global reach with offices in the UK, Australia and the US.

GMG procures many different services from a variety of suppliers. The supply chains currently relate mainly to the following activities: printing and publishing; distribution of print products; retail products; events services; building services; IT infrastructure and transport; recruitment and training; customer services; and marketing and advertising.

Policies in relation to slavery and human trafficking

The organisation works to minimise the risk of modern slavery and human rights violations across its operations, and supply chains, including assessing the standards practised by significant suppliers to ensure that they do not have practices that produce substantial negative impacts regarding human rights, labour conditions or local communities.

The organisation has a history of engaging with human rights issues more broadly, which frames the activity around reducing the risk of slavery and human trafficking. GMG has in place a [Guardian Sourcing Policy and Guardian Sourcing values](#) in recognition of the fact that it relies on suppliers and partners and does not always have direct control over its impact on the environment and people. The Guardian Sourcing Values incorporate the findings of a consultation within the business on international standards and guidelines, such as the International Labour Organisation eight fundamental conventions, United Nations Global Compact 10 principles and the UN Guiding Principles on Business and Human Rights.

The Guardian Sourcing Values provide the framework against which an ethical assessment of GMG’s suppliers are measured. GMG requires suppliers to comply with applicable legislation and regulations and be aware of the key risks to human rights in their operations and supply chains, and includes relevant obligations in services contract templates.

GMG is committed to ensuring that all employees are paid fairly and to support this it has been a Living Wage Accredited Employer for a number of years. The company has in place a company minimum salary, in excess of the Living Wage, thereby reinforcing this commitment. The minimum salary is reviewed on an annual basis. Furthermore, GMG has a strong relationship with recognised unions, the National Union of Journalists and Unite. Additionally, there are employee forums that provide a platform for employees to raise any concerns on matters relating to pay and the working environment more generally. The combined effect of GMG’s commitment, reinforced with a strong governance framework, helps ensure that modern slavery is not occurring in the operations.

STEL has an Environmental and Social Impact policy, which outlines how the endowment seeks to generate real-world positive impact through its investments and engagement with stakeholders, while pursuing a primary objective of generating strong risk-adjusted returns. STEL has been reviewing its

policy to include human rights and modern slavery, outlining its commitment to upholding human rights and combatting modern slavery through its investment practices.

Due diligence processes

GMG and its suppliers are expected to live up to and adhere to the principles of the Guardian Sourcing Values.

Procurement processes take into account the potential risk factors of different types of suppliers and, where appropriate, new suppliers go through an assessment process to evaluate risk, including in relation to human rights and modern slavery. The ethical due diligence process relates to purchasing across all offices where the goods and services touch on the activities of the UK business.

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

STEL primarily invests in collective funds run by investment managers. STEL assesses the goals, capabilities, and policies of its investment managers with respect to environmental and social impact as part of its initial investment assessment and in ongoing monitoring. This assessment examines the investment managers' policies and public disclosures on modern slavery, the actions they have taken to mitigate the risk of modern slavery in their operations and supply chains, and the procedural controls and practices in their recruitment and remuneration process to mitigate the risk of modern slavery. STEL also assesses investment managers' stewardship with investee companies and their supply chains on these issues.

Risk assessment and management

Categories and services that may be of a higher risk of modern slavery have been identified based on a calculated risk assessment. This includes environmental, social and governance risk mapping, taking into account factors such as the complexity of the employment relationship and profiling of the type of work undertaken.

The process involves engaging with the suppliers in these higher risk categories, including but not limited to highlighting relevant sections of the code with the relevant supplier. During the period, 47 new potential suppliers for GMG were identified in the higher risk categories. These were all assessed and were all considered appropriate to onboard as new suppliers to GMG.

In addition to the potential new suppliers, we also re-assessed 8 of GMG's current suppliers. None of these raised any concerns. During 2025/26 GMG plans to continue to re-assess as many of GMG's current higher risk category suppliers as possible.

Supplier terms and conditions require suppliers to comply with the MSA, thereby reducing the risk of modern slavery and human trafficking in the supply chain. In the case of higher risk suppliers, the contracts include audit and termination rights to enable more effective monitoring of those suppliers and to enable us to take the relevant action.

Policies are in place to ensure that responsibilities are met to respect and protect human rights, including in relation to modern slavery, including policies covering: economic governance; access to information; engagement with young people; safety security and wellbeing; access to grievance and remedies; discrimination; protection of the environment; and human rights.

Through its investment stewardship STEL works with its investment managers and expects them to have policies and processes to minimise the risk of human rights violations and modern slavery across investee companies and their supply chains. Some investment managers that STEL invests with lead industry-wide initiatives that seek to improve a broad range of human rights and STEL encourages its investment managers to be part of collaborative investor initiatives combatting modern slavery. STEL participates in investor initiatives that incorporate a respect for human rights in the expectations set of companies.

Effectiveness in ensuring that slavery and human trafficking is not taking place

No evidence has been found of practices that violate the Guardian Sourcing Policy or Values within our current suppliers, including the values that relate to slavery and human trafficking. During the period, no supplier questionnaires as part of the due diligence questionnaire for new suppliers has raised material concerns. Modern slavery provisions continue to be included in contracts where applicable.

The Guardian has been certified BCorp since 2019 and was recertified in 2023. BCorp certification will be reassessed every three years, requiring The Guardian to supply evidence of applicable policies and processes relating to (among other things) employee rights, supply chains and environmental impact.

STEL engages with its investment managers annually to monitor progress made in upholding human rights and combatting modern slavery. STEL encourages its partners to report any incidents to comply with relevant discourse regimes, and to learn lessons to inform measures to prevent similar harm occurring in the future.

Principles are in place to assist decision-making in the event of a breach of standards, for example a requirement to address any breach immediately.

Training

GMG has a procurement team which has been trained to assess the risks of modern slavery throughout the tender processes, contract renewals and at the point of new supplier approvals.

This statement is made pursuant to section 54(1) of the MSA and constitutes The Scott Trust, GMG and STEL's slavery and human trafficking statement for the financial year ending 31 March 2025.

Approved by the Board of Directors of The Scott Trust, GMG and STEL on 15th July 2025.

Anna Bateson

Chief Executive Officer

Date: 15 July 2025