

# Avoiding and Eliminating Modern Slavery

Informa's Modern Slavery Statement 2019

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# Modern Slavery Statement 2019

This is Informa Group's fourth Modern Slavery Statement, published in accordance with the UK Modern Slavery Act 2015.

In it, we set out the action taken by Informa Group, including subsidiaries, to prevent modern slavery and human trafficking within our business and supply chain during the year ending 31 December 2019.

Informa's role as a leading international events, intelligence and scholarly research Group, gives us a powerful perspective on the many ways that businesses connect, do business and take informed decisions. It is important to us that our own connections and relationships with partners and suppliers reflect our values and commitments as a responsible business.

We have [four Guiding Principles](#) as a Company, which were refreshed during 2019. Each principle reflects our culture and is designed to support responsible business practices. One in particular has a specific relevance to the issue of modern slavery: **Success is a Partnership**.

The partnerships and business relationships that are part of our success must be sustainable and of mutual benefit. The abhorrent practice of modern slavery and forced labour is the opposite of true partnership and can form no part of how Informa works.

We remain committed to ensuring that, as far as possible, our business and our supply chain operates free of modern slavery in all its forms, and we support the global effort to eliminate modern slavery and human trafficking from business.

This Modern Slavery Statement was approved by the Board of Directors at its Board meeting on 6 November 2020. It is made on behalf of Informa PLC and all applicable subsidiaries, where the activities form part of the supply chain or business of Informa as a parent company. This includes Informa UK Limited, Informa Connect Ltd. (formerly known as IIR Ltd.), Informa Telecoms & Media Ltd. and Informa Markets UK Ltd (formerly known as UBM UK Ltd.).

A full list of our subsidiaries can be found in [the 2019 Informa Annual Report](#) and contact details for any other questions or enquiries are also available [on our website](#).



Stephen A Carter

Group Chief Executive

6 November 2020

# 1. About Informa

Informa's purpose is to **Champion the Specialist**. Through hundreds of powerful brands, we work with businesses and professionals in specialist markets, providing the connections, intelligence and opportunities that help customers grow, do business, make breakthroughs and take better informed decisions.

Our teams organise in-person and online events and exhibitions for international communities, deliver specialist data and intelligence services in a variety of formats and provide access to cutting-edge academic research in digital and print formats.

Informa is listed on London Stock Exchange and is a member of the FTSE 100, with 11,000 colleagues working in more than 30 countries. The Group generated annual revenues of just under £3bn in 2019.

The Group is organised into five operating divisions: Informa Markets, Informa Connect, Informa Tech, Informa Intelligence and Taylor & Francis, supported by a sixth business, Global Support, which provides Group functions and support services to the rest of the organisation.

## Our Colleagues

At the end of 2019, Informa employed 11,000 colleagues in 38 countries on a permanent basis, supported by over 1,000 contractors and contingent workers.

Recruitment to the Group, including recruitment of contractors and contingency staff, is managed by specialist recruitment teams in each of the divisions. The recruitment process is closely scrutinised. All those engaged to work in Informa are subject to identity checks and a confirmation of the Right to Work in that location as part of the onboarding processes. Where applicable, this includes age and citizenship status checks.

Informa has been a Living Wage employer in the UK since 2017.

## The Supply Chain we work with

The partnerships we form with suppliers, contractors, agents and other businesses and professionals are integral to Informa's success. Our aim is to create and maintain sustainable partnerships of mutual value and trust. Whether they are long or short term engagements, we seek to work with those that share our values, both in terms of the quality of the product or service they provide and the methods they use. We expect all our business partners to operate in an ethical, lawful and socially responsible manner.

Informa's Business Partner Code is used to support the tendering process and contracts with business partners across all Divisions and applies to suppliers, contractors, agents and other third parties. It contains an explicit requirement that business partners must not engage in, work with or subcontract to any third party that engages in the use of forced labour, human trafficking, or any methods used to prevent free movement of labour. In 2019, no breaches of this clause were identified or reported.

## Overview of supply chain

In 2019, the Group engaged with over 44,000 suppliers across more than 120 countries, who fell into the below categories:



Due diligence on suppliers is carried out on a risk basis, with the specific criteria determined by the Division owning the supplier relationship. Suppliers who are categorised as tier one partners, because of the level of expenditure or because their product or service is identified as business critical, are subject to additional, enhanced due diligence, which includes checks on compliance, social responsibility and anti-exploitation of labour.

In 2019, our Informa Markets division, which is responsible for approximately 44% of overall procurement spend, introduced a new procurement system that builds into the tendering stage of procurement the requirement to comply with our Business Code of Conduct. To date, nearly 170 tenders have been run on the new system, with roll out continuing into 2020.

## 2. Our Modern Slavery Programme

### Programme governance and frameworks

Informa's modern slavery programme is overseen by the Group Compliance function under the Head of Group Compliance. It is supported by Group functions including Legal, Sustainability, Procurement, Human Resources and Internal Audit, and continues to be executed by operational teams in each division. At Executive Management Team level, the Group General Counsel has oversight.

The programme sits within our broader Human Rights programme, guided by the International Bill of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights to Work, and the work we do more broadly to support and promote responsible business. We operate in compliance with local laws, are committed to respecting internationally recognised human rights standards and follow the United Nations Guiding Principles on Business and Human Rights.

## 3. Modern Slavery Risk

The most significant part of our modern slavery programme is the process by which we identify our risk of modern slavery, assess its likelihood and potential impact, and identify and deploy multiple means of managing or reducing the risk that it may occur.

### Risk identification and assessment

We recognise that risk is a natural consequence of doing business, and seek to manage and monitor it as part of business strategy. Our approach is to enable colleagues and leaders to make informed decisions about risk and to manage rather than eliminate risk. Risk identification, understanding and monitoring are carried out through a set of governance structures, policies and frameworks, which are described in detail in our [Annual Report](#).

Our risk assessment processes consider both financial and non-financial impacts and the broader likelihood of their occurrence. In our assessment of the risk of exposure to modern slavery in Informa's operations and supply chain, we follow the standard Group Risk processes. These are then overlaid by modern slavery-specific considerations, seen from the perspective of the rights holders and with consideration of remedy, in line with the United Nations Guiding Principles.

This model was developed using findings from the Group-level Human Rights Risk Assessment conducted in 2018. Sources of data used to assess our modern slavery risk include the Global Slavery Index and the Freedom in the World Report.

The following key risk indicators are considered:

- Nature of the business operations
- Industry sector, including the type of product or service provided and nature of workforce
- Geography, including location of operations, offices, venues, supply chain partners
- Level and type of engagement with the supplier (larger, business critical or longer-term engagements provide us with greater opportunity to influence, monitor and support)
- Local / national regulatory or legal compliance

We consider the interrelationship of these indicators closely, where, for example, the geographical risk of engaging with partners located in certain jurisdictions may be mitigated or exacerbated by the nature of the service or product provided. For example, we work with many highly respected global academics and subject matter experts, whose location in countries recognised as having a high incidence of modern slavery should not in and of itself mean that our business relationship with them constitutes a risk.

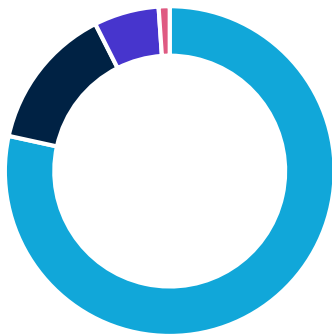
Modern slavery risk continues to be considered as part of other broader operational risk assessments, including the Group Risk function's Country Risk Assessments. These are used to identify various operational, security and reputational risks for existing and prospective markets, where it is considered alongside broader human rights threats and issues.

## Modern slavery risk profile

In 2019, our risk assessment and identification processes have focused on the locations and the industry sectors with which we and our business partners operate. Our other key risk indicators are used to identify appropriate means to address, mitigate or otherwise manage our risk.

### Geographical risk

The findings of the 2018 and 2019 Global Slavery Index have been used as a reference to determine the Group's relative exposure in the territories in which Informa's colleagues, customers and business partners operate and live. This geographical risk assessment also takes into consideration the impact of laws and regulations which may have been put into place by local or national governments to help to address modern slavery, and the overall culture of the location.

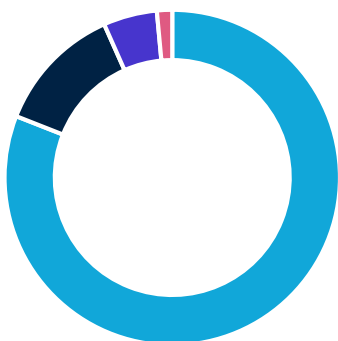


### Colleagues

2019: 11,000+ colleagues in 38 countries

93% of colleagues in locations assessed as low or moderate risk of modern slavery

In 2019, 78% of colleagues were located in countries assessed as having the lowest prevalence of modern slavery, including the UK, US, Australia and Canada, with a further 14% located in countries assessed as having a moderate prevalence, including colleagues located in China and Singapore. 1% of the colleague population is located in areas assessed as very high, including Thailand and the Philippines. However, alongside the broad country risk, we also consider the comparatively high professional status, qualifications and experience of the colleagues concerned.



### Suppliers

2019: over 44,000 suppliers in 120+ countries

Over 93% of procurement expenditure was with suppliers located in countries rated as low or moderate risk

■ Low ■ Moderate ■ High ■ Very high

Over 93% of our procurement expenditure took place in countries assessed as having low or moderate risk of modern slavery, according to the same assessment criteria. Our engagement with business

partners in some of those countries rated high or very high risk is low, at just 1.5% of our total spend, and includes examples such as partnerships with academics, professionals, subject matter experts and expert speakers who are based in locations including Laos and Rwanda.

### Industry sector risk overview

Analysing our products and services in terms of particular industries they rely on, we identified the below sectors as areas that could be exposed to the risk of modern slavery and associated labour and human rights abuses, and our programme places particular focus on these.

#### Construction

- Office buildings and venues, including temporary structures
- Construction and take down of stands at events

#### Timber products

- Paper and card used in printing of publications and office supplies
- Timber used in stand construction for events

#### Hospitality and venues

- Exhibition centres, trade centres and other event venues
- Hotels and other venues used by event attendees or colleagues during business travel

#### Manufacturing

- Small manufactured products e.g. branded badges, lanyards, gifts
- Printing and related production including binding, inks

#### Mining

- Extracted minerals and metals used in extended supply chain
- Products include event stands and structures, technology

#### Service sector

- Facilities management services for offices and venues, including catering, waste management, cleaning, maintenance

## 4. Addressing and Managing Modern Slavery

The actions we take to address modern slavery fall into three categories:

- Risk mitigation: processes and controls that reduce the likelihood that modern slavery will occur, and address potential severity in the event that it does
- Engagement with colleagues and business partners: communication, training and clearly articulated policies that ensure that our position is known and understood and that key teams are equipped with the knowledge to support the programme
- Participation: supporting global efforts to address modern slavery through our industry connections, influence and our products and work as an organisation



## Risk mitigation

Informa deploys a number of measures to address and mitigate the risks represented by our operations and third-party engagements, according to how the risk to the Group is assessed. We specifically consider the key industry sector risks outlined above.

Some of the measures used in different ways across our Divisions include:

- Specific anti-modern-slavery and anti-child labour clauses in exhibitor and attendee manuals and codes of conduct, contracts and framework agreements
- Embedding the requirement to comply with the Business Partner Code of Conduct in tendering processes and as a contractual clause
- Communication, training and engagement with key teams, including identification of red flags
- Site and venue in-person monitoring, including monitoring by operational teams for the presence of children on site during event construction and take down, and monitoring for the use of forced labour
- Audit and monitoring to ensure that teams continue to follow processes, including modern slavery and child labour checks conducted by Group Internal Audit team as part of operational audits at events, , plus tracking to completion of any corrective actions identified
- Internal recruitment processes, including identity and rights to work checks, and payment of a Living Wage
- Use of ISEMS (Informa Sustainable Event Management System) to track and report on actions taken by Event operations teams, including modern slavery related activity and awareness training
- Provision and communication of confidential or anonymous multi-language multi-channel reporting lines

## Specific sector risk mitigation activity

### Events and exhibitions

#### *ISEMS*

The risk represented by our events and exhibitions is managed via a combination of the risk mitigation measures listed in the section above.

In addition to these measures, in 2019 the Group Sustainability Team launched the Informa Sustainable Event Management System (ISEMS) to detail and track the actions taken by our events operations teams to create more sustainable events and exhibitions. This includes impacts on community, wellbeing, equality and respect for all. The System aims to help teams understand what a sustainable event looks like, identify areas of focus appropriate to the specific event, encourage continual improvement and track performance. Recommended types of activity to enhance our positive and sustainable social impacts include the delivery of training on modern slavery, forced and child labour to the operational teams.

Over 50 events have now completed the first step in the System: Event Fundamentals. The ISEMS process is tracked and monitored by the Group Sustainability team.

### Print production

Informa continues to be a member of the Book Chain project, a collaborative project aimed at developing more responsible and sustainable supply chains for publishers. The Book Chain Project, which involves 28 leading book and journal publishers and their print and paper suppliers focuses on Forest Sourcing, Chemicals & Materials, and Labour & Environment.

Informa participates in Labour & Environment, which sets publishers' expectations on labour practices and environmental management for our print suppliers, shares audits and hosts the industry Code of Conduct. The Code is based on the ILO conventions, the UN Declaration for Human Rights and the ETI basecode, amongst other internationally recognised Codes and laws. Suppliers from countries assessed as being higher risk are required to submit an audit from a third-party provider, such as ETI, or may request to be audited by SMETA against the provisions of the Code.

All of the suppliers involved in Taylor & Francis's Journals production to which the Book Chain project is relevant have signed up to the Book Chain, including some who may be considered higher risk owing to the location of their operations.

### Paper and timber usage

Timber remains an industry with a significant identified risk of forced and child labour, especially where forests are harvested unsustainably or illegally.

Informa aims to mitigate the risk represented by its use of timber and paper products by a commitment to ensure, as far as possible, that the timber and paper used in our offices and products hold a responsible sourcing certificate, such as the FSC, which provides chain of custody assurance and holds workers' rights as one of its key principles.

This commitment remains a cornerstone of the Group's sustainability programme is reported annually as a KPI in Informa's Sustainability Report.

In 2019, 94% of paper and timber used was derived from certified sources, a figure independently verified by Bureau Veritas. The KPI is to achieve 95% sourced from sustainable, certified sources by 2020, with a long term target of 100%.

We have a Group Paper and Timber Policy, which was revised in 2019 and sets out in more detail our commitment to certified paper and timber. The policy is mandated for those colleagues who are responsible for ordering timber or paper materials either directly or through contractors. It requires them to obtain certified timber or paper, or recycled products, wherever possible, to ensure that the policy forms part of all contracts with relevant suppliers, and to monitor ongoing compliance with the policy.

To mitigate the greater risk associated with timber or paper sourced from certain areas, such as South America or South East Asia, colleagues are required to engage in greater due diligence on such products, in the event that certified sources are not available. As a minimum, it is required that suppliers provide confirmation that the timber or products provided are legally harvested and there are no human rights violations in their supply chain.

## Reporting concerns

To support the processes and controls in place to mitigate modern slavery risk, we ensure that everyone who works with us or for us, or who visits any of our events, has the opportunity to report things that they have seen or experienced and raise concerns with us freely and in confidence.

All Informa's colleagues, business partners and customers are able to access whistleblower reporting lines, to raise concerns securely and in confidence about anything they may have observed or experienced during their time working with Informa or visiting our premises or venues.

Our whistleblowing reporting line, Speak Up (link) is hosted by a third party, Navex, and is free in most countries and available in multiple languages. Our revised Code of Conduct, Business Partner Code of Conduct and all our Global Policies continue to provide details on how to access Speak Up or make use of other channels, such as emailing the Group Compliance, Legal or HR teams, to make confidential reports. Our Business Partner Code also contains a requirement for our business partners to communicate these details to any of their employees engaged on Informa's business.

The process for reporting concerns is also covered in more detail in our new Speaking Up Policy, developed in 2019 and will be included in future Code of Conduct training. It explains in more detail the multiple reporting channels available for colleagues, includes details on the process for reporting other types of concern (such as those managed by the Privacy or Health, Safety and Security functions) and the process we follow during investigations and afterwards.

Breaches of any aspect of the Code of Conduct and associated Group Policies is reported to the Risk Committee and Board on a regular basis, by the specific functions responsible, and volumes of breaches and resolution times are tracked. The Group Compliance team maintain a watching brief on reports made via the Speak Up line to ensure they are managed appropriately and consistently.

## Training and awareness activities

In 2019, there was a focus on developing a broader understanding of the areas of risk within our business, and on supporting colleagues to recognise and report on potential labour abuses.

### Training

In 2019, our mandatory Code of Conduct training was redeveloped to reflect new content in our Code of Conduct, including a section on recognising and responding to red flags for forced and child labour. The training will be rolled out to all colleagues in 2020, including directly engaged contractors, and will be available in nine languages.

Code of Conduct training continues to be mandated for all new joiners. The KPI for all Code of Conduct training is 70% completion within 30 days, and 95% completion for the colleague population overall.

### Enhanced training and engagement

In 2019, targeted modern slavery e-learning, face-to-face training and awareness sessions were provided to core teams including Group Sustainability and senior procurement management and procurement teams in the divisions.

In addition, one of the senior members of the modern slavery programme completed a comprehensive modern slavery risk management and programme delivery course, run by Ardea International and accredited with IEMA.

### Communication

The Group marked International Slavery Day with intranet communications designed to remind all colleagues about key risk areas within our organisation and supply chain, their role and reporting methods. Any colleague wishing to find out more about modern slavery was given access to our e-learning module, which is normally deployed to those in roles specifically relevant to our risk management work.

### Policies

Our modern slavery and child labour commitments are expressed in two key documents, our Code of Conduct and our Business Partner Code of Conduct, which together set out our expectations of our colleagues and business partners and are available [on the Informa website](#) and our intranet.

Our Code of Conduct, *How we work at Informa*, was fully revised in 2019 and aligned with our new Guiding Principles, and is endorsed by the Group CEO and approved by senior management. The Code has been translated into nine languages to reflect the needs of our global colleague population.

In line with our risk assessment for the Group, the revised Code of Conduct now contains the following additions:

- Colleagues are required to report suspected labour abuses when visiting or working on an event, travelling on Informa business or visiting business partners
- Colleagues engaged in recruitment are required to carry out appropriate due diligence

All colleagues are mandated to comply with the Code of Conduct and will be required to confirm this individually as part of the global training programme scheduled for 2020.

The associated Business Partner Code of Conduct was also revised and will be available in 2020. Publication of the Group Human Rights Policy, originally scheduled for 2019, is now expected in 2021.

The Code of Conduct is supported by more detailed process documents on regional and divisional recruitment and procurement, which are available to colleagues on our intranet.

### Indices

Informa continues to participate in a number of benchmarks and indices which require us to make disclosure of our work on human rights, modern slavery and other labour rights abuses within our business and supply chain.

In 2019, we maintained our place in the Dow Jones Sustainability Index and our score included an increase to the 95<sup>th</sup> percentile for our work on Human Rights.

Informa is also a member of the Ethibel® Sustainability Index Excellence Europe and the FTSE4Good.

## Our wider contribution to global modern slavery efforts

### Sustainable Development Goals

The UN's 17 Sustainable Development Goals (SDGs) are the framework through which government, businesses and society can combine to address the biggest issues faced by the world. In 2019, Informa confirmed its commitment to supporting the SDGs, focusing not just on the actions of our own business and people, but on the connections, access to specialist knowledge, analysis and research required to support their own efforts. We report on our relative contribution to the SDGs in the annual Sustainability Report, and in 2019, SDG 8, which includes the subsidiary Goal 8.7 (*take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour*) was identified as one of the Group's top four SDGs in terms of contribution across our brands.

For Modern Slavery, we make a positive contribution to the global effort through the scholarly research we publish on the topics of modern slavery, human trafficking and bonded and child labour, including in-depth studies of current anti-slavery legislation and reviews of the impacts of slavery on victims, economies and communities. Books published in 2019 include the Routledge International Handbook of Human Trafficking and Modern Slavery Legislation, as well as over 600 articles on human trafficking and modern slavery in journals including the International Journal of Human Rights and the Journal of Human Trafficking, which supports the greater understanding of human trafficking by publishing diverse scholarship on all forms of contemporary slavery.

### Industry associations

Through different teams and businesses, Informa is a member of several industry associations that run programmes targeting modern slavery, human trafficking, and child labour, including the UFI (Global Association of the Exhibition Industry) and the IAEE (International Association of Exhibitions and Events).

Informa's Group Head of Sustainability is a member of the Event Industry Council's Sustainability Committee, which sets the EIC's sustainability strategy, including contributing to the development of their Four Principles. The Group is a signatory to these Principles, which include Basic Social Considerations, including universal human rights and labour practices. In 2019, the Council updated its Sustainable Event Standards to include a greater emphasis on regional relevance, social justice, accessibility, diversity and inclusion, including specific measures to raise awareness of human trafficking among members.

## 5. Monitoring, Effectiveness and Response

### Monitoring

Informa's Internal Audit team reviews specific elements of this programme as part of their operational audits. Actions identified are managed to completion and any non-completed actions raised with the Group Audit Committee.

The Business Partner Code of Conduct contains provisions for audit, and we reserve the right to terminate any contract with a business partner in the event that non-compliance with our policies is discovered and

non-compliance is repeated, severe, or cannot be resolved. Individual business partner relationship owners conduct visits to key business partners during the course of the business relationship and, while these are not always formal audits, they provide opportunities for observation of potential issues and engagement with the business partners' employees.

Compliance with the ISEMS reporting system is tracked and monitored by the Group Sustainability team.

Reporting of several key performance indicators for the Group's sustainability programme, including the level of use of certified sustainable timber and paper, was independently verified by Bureau Veritas in 2019.

Training completion statistics plus reports of any breaches of the Code of Conduct are reported to the Group Risk Committee and to the Board.

## Effectiveness

We recognise that the ability to measure the effectiveness of a programme is about providing channels for observing, reporting and identifying cases of modern slavery throughout our operations and supply chain, whether suspected or actual.

We have received no reports in 2019 of cases of suspected or actual modern slavery or child labour, whether through our Speak Up line or other reporting channels, material or otherwise. In addition, none of our current business partners reported any such concerns to us, via their direct contacts with our operational teams, or via our Speak Up line or any other channel.

Internal audit and operational team checks did not discover or observe any instances of forced or child labour, suspected or actual, at our events in 2019.

Our engagement with business partners and other third parties, supported by procurement, recruitment and legal teams, and the colleagues who engage with our third parties on a regular basis, did not report any new concerns, though we continue to monitor a prospective exhibitor whose possible association with forced labour was identified to us in 2018. No cases of modern slavery amongst our current business partners were reported to us via any channel.

## Response

While our Business Partner Code of Conduct gives us the ability to terminate contracts where gross or repeated breaches of its conditions have occurred, we recognise that the use of modern slavery or forced labour is not a problem that is solved if a contract ends, nor is the termination of a contract always in the best interests of those being abused. Even though it is more challenging for the teams involved, it can be more constructive to work with such organisations to address and resolve the issues, where this is possible. Our engagement with teams responsible for procurement and third-party relationship management continues to communicate this, and we work with them to enable them to identify alternative processes in the event that they are exposed to this.

For colleagues, our Code of Conduct mandates compliance. Any breaches may result in disciplinary action, up to and including dismissal, and any colleague knowingly making use of trafficked, child or forced labour would be subject to these processes.