



## **Modern slavery and human trafficking statement**

### **Introduction**

This statement covers the activities of Argonon and its subsidiary companies (collectively, “Argonon”).

This statement sets out Argonon's actions to understand 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 business and its supply chains. This statement relates to activities during the financial year 1 January 2018 to 31 December 2018 and action points for the following financial year.

As part of the television and media industries, Argonon recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Argonon is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

Argonon is an independent production group headquartered in London with offices across the United Kingdom and in New York and Vancouver. The group consists of several companies who produce programming for a wide range of major broadcasters in the UK and USA.

### **Countries of operation and supply**

Argonon currently has companies in the following countries:

- United Kingdom;
- United States of America; and
- Canada.

Due to the nature of Argonon's work, operations can extend into countries across the globe during the making of television productions.

The following is the process by which the Argonon assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Overall risk assessment of Argonon's activities is undertaken by members of the legal team with input from finance and HR colleagues and with general oversight by senior management and the governing board.
- Risk assessments for individual productions are undertaken by a production manager with support from the group Director of Productions. Each broadcaster also requires production companies under commission to comply with the broadcaster's corporate policies and due diligence procedures.
- Finance staff in collaboration with production management adhere to internal due diligence procedures when engaging suppliers including checking the standing of companies in both domestic and foreign jurisdictions and taking industry references.
- Any concerns about a supplier are escalated to the senior management team of the relevant subsidiary company and to Argonon's central legal and senior management team where necessary.

### **High-risk activities**

We do not consider our business activities to pose a high risk of modern slavery.

In terms of our supply chains, we regard the risk factors to be territorial and whether a supplier is a significant supplier of people. Our modern slavery procedures will continue to be risk based in this manner, with our attention focussed on areas of higher risk.

## Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Policies are drafted by the legal team and reviewed by the relevant finance and HR staff with oversight from senior management. Policies are developed based on government guidance, legislation and industry best practice.
- **Risk assessments:** Risk assessment with regards to human rights and modern slavery risk analysis is undertaken annually by the legal team in consultation with finance and HR colleagues.
- **Investigations/due diligence:** All staff are encouraged to raise concerns to either their line manager or to HR in relation to known or suspected instances of slavery and human trafficking. Legal and finance staff along with senior management are engaged as required.
- **Training:** Argonon has a training policy in place and actively encourages staff to request training opportunities. Argonon will be implementing training designed to ensure staff better understand and respond to slavery and human trafficking risks.

## Relevant policies and contractual obligations

Argonon operates the following policies and ensures the appropriate contractual obligations are in place to mitigate the risks of modern slavery and outline steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** Argonon encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Argonon's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential disclosure form.
- **Contractual obligations** Argonon's contracts with staff and suppliers contain an obligation to ensure that their actions and behaviour are appropriate and an obligation to adhere to all company policies and procedures. Argonon strives to maintain the highest standards of employee conduct and ethical behaviour within its operations and its supply chain.
- **Recruitment Policy, Policy on Basic Pay, and Work Experience Policy** These policies are designed to ensure that Argonon is undertaking rigorous recruitment processes and to ensure that all members of staff are paid at an appropriate level for the work that they provide including strict adherence to the National Minimum Wage.

## Due diligence

Argonon undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Following a risk assessment of Argonon's due diligence and practices, the organisation is putting in place further procedures and training to ensure the organisation is:

- assessing the geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of supply chains;
- conducting supplier audits or assessments where risks have been identified;

- taking steps to improve procedures for engaging suppliers who operate in high risk jurisdictions, including contracting with suppliers on the organisation's standardised supplier contracts which require each supplier to adhere to the organisation's corporate policies;
- providing advice to suppliers if substandard practices are identified; and
- invoking sanctions against suppliers that seriously violate the conduct expected of each supplier, including the termination of the business relationship.

### **Performance indicators**

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring all production managers, the group Director of Productions, all other relevant production staff and relevant central Argonon staff to have completed training on modern slavery by 30 September 2019;
- improving the system for supply chain verification expected to be in place by 30 September 2019, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- ensuring all new suppliers who are operating in high-risk countries (as determined by reference to the Global Slavery Index [here](#)) are obligated by virtue of agreeing to Argonon's supplier agreements to warrant that the supplier does not engage in modern slavery and has processes in place to prevent modern slavery and human trafficking in its supply chains.

### **Training**

The organisation will require all relevant staff working in high risk countries and in relevant Argonon central roles to complete an internal training course on induction or for current members of staff by 30 September 2019.

The organisation's modern slavery training will cover:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available;
- how to contract with suppliers to ensure the supplier is obliged to prevent modern slavery and human trafficking within its operations; and
- what steps Argonon should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Argonon's supply chains.

### **Awareness-raising programme**

As well as training staff, Argonon is working to raise awareness of modern slavery issues by providing access to relevant information on the organisation's intranet and drawing staff's attention to this via email. The information provided will include:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

- what external help is available, for example through the Modern Slavery Helpline.

**Board approval**

This statement was approved on 28 March 2019 by the organisation's board of directors, who review and update it annually.

**Director's signature:**



---

**Director's name:**

LAURA BEWELL

**Date:**

28 / 03 / 19