

Bonhill Group plc

Modern Slavery Statement

June 2019

1. Overview

This is Bonhill Group plc's Modern Slavery Statement. It describes our response to the UK Modern Slavery Act 2015 and sets out the steps we are taking to identify, address and prevent modern slavery and human trafficking in our business and supply chain.

While Bonhill has always sought to follow ethical business practices, we are developing a programme that makes a much more explicit commitment to the work of eradicating modern slavery, both in our business and also within the business partners in our supply chain to ensure that we operate in line with the principles of the UK Modern Slavery Act.

2. Company structure, business and supply chain

Bonhill is an international B2B media company owning market leading brands and delivering innovative Business Information, Live Events and Data & Insight products & services to our communities in the Diversity, Financial Services and Technology sectors, in the UK and overseas.

The company's key areas of supply chain expenditure are staffing & contributor fees, printing & distribution, event logistics, technology & communications and facilities management. Our goods and services are sourced from around the world.

We are fully committed to ensuring that we do not participate in the violation of human rights and would expect the same from our suppliers.

3. Risk assessment

We are in the process of launching an annual review of our own business and our business partnerships across our supply chain. This will include:

- Completion of a supply chain risk assessment using the Social Responsibility Alliance's STRT template;
- Updating our list of suppliers and assessing them against the follow metrics:
 - Size of expenditure;
 - Industry sector and/or product/service delivered; and
 - Exposure to high risk countries;
- Categorising the above suppliers into three tiers:
 - Tier 1: High risk – The supplier must confirm acceptance of the company's Business Partner Code of Conduct and complete a supplier questionnaire designed to identify any areas of non-compliance with the Business Partner Code of Conduct and to confirm that our supply chain is slavery and human trafficking free;
 - Tier 2: Medium risk – The supplier must make its own publicly available Modern Slavery Statement; and
 - Tier 3: Low risk – The supplier must receive notification of the company's Business Partner Code of Conduct during the procurement process.
- Preparing a supplier questionnaire as noted above;

- Reviewing our procurement procedures e.g.:
 - Reviewing current procedures with specific reference to modern slavery;
 - Identifying which areas are in need of improvement;
- Identifying and implementing a schedule of work targeting any key risk areas.

4. Code of Conduct and policies

The company's Staff Handbook and Code of Conduct set out our business ethics for our colleagues with respect to workplace issues such as working hours, forced labour, non-discrimination, freedom of association and health and safety. They include a commitment to respect human rights, a definition of modern slavery, the company's aims with reference to modern slavery and how these relate to our business partnerships. Any breach of the Staff Handbook or Code of Conduct is a breach of a colleague's employment terms. Reports of violations of the Staff Handbook or Code of Conduct or associated policies are investigated thoroughly and remedial action, including disciplinary procedures, are taken where necessary.

We review our HR and recruitment policies and procedures annually to ensure that we comply with all applicable laws and protect the rights and freedoms of all those working in our operations. Our recruitment and employment policies address issues such as working hours, working conditions, whistleblowing, discrimination, health and safety in the workplace, holiday and sick pay.

All staff have access to a confidential whistleblowing process for raising concerns including in relation to modern slavery or human trafficking and it is clear from our policies that all staff are invited to speak up if they have any concerns or suspicions that any violation has taken place and will be protected of any retaliation.

5. Third party relationships

The Business Partner Code of Conduct articulates the compliance and ethics standards Bonhill expects as a minimum from all business partners. The code includes detail of our expectations and suppliers' obligations with reference to prohibition of child labour, forced labour (including human trafficking), physical disciplinary abuse and any infraction of an associated law. We intend that, when contracts are renewed, updated or initiated, business partners will be required to comply with the principles in the code, as a minimum standard of behaviour. Any breach of the code will be a breach of a partner contract.

6. Due diligence measures

All colleagues have responsibility for procurement due diligence:

- The company's procurement process is the ultimate responsibility of the COO. The COO is supported by division heads who have specific procurement responsibility e.g. Finance, HR, Technology, Events & Editorial. The COO and division heads will review the company's procurement procedures and implementation on a regular basis.
- Division heads are responsible for those colleagues in their teams who engage in procurement activities to ensure that the company's Staff Handbook, codes of conduct and policies are being properly followed with particular regard to modern slavery.
- All colleagues have a duty to follow the company's Staff Handbook, codes of conduct and policies and to highlight any concerns that they may have about the company's, or its suppliers', processes.

Should a supplier fail to meet the minimum standards outlined in our Business Partner Code of Conduct and/or fail to satisfactorily complete their supplier questionnaire and/or fail to make a Modern Slavery Statement Bonhill reserves the right to terminate the business supplier relationship immediately without consequence or liability.

7. KPIs

We have determined the following KPIs to measure the effectiveness of our Modern Slavery procedures:

- No. and % of Tier 1 suppliers that confirm that their organisations comply with our Business Partner Code of Conduct and/or have adequately completed our supplier questionnaire;
- No. and % of Tier 2 suppliers that have public Modern Slavery Statements or the equivalent;
- No. and % of Tier 3 suppliers that have been made aware of the company's Business Partner Code of Conduct;
- No. and % of colleagues who have received information on the company's Modern Slavery procedures.

8. Reporting issues and enforcement

It is critical that anyone, whether a colleague, contractor, or supplier, can make Bonhill aware of concerns or potential issues. Details of how to make a report are published and available both internally through our Staff Handbook and Code of Conduct, and externally to third parties through our Business Partner Code of Conduct on the company's website. Reports of issues and concerns, including those with modern slavery related concerns should be raised via the whistleblowing process. The company operates a strict "no retaliation" policy for anyone who reports a concern in good faith.

While we prefer to resolve issues through support and re-education, where adherence to our stated principles are contractually enforceable, we will reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered, and the noncompliance is not addressed or cannot be resolved in a timely manner.

9. Training

Following approval of this statement all of the Bonhill UK's colleagues will:

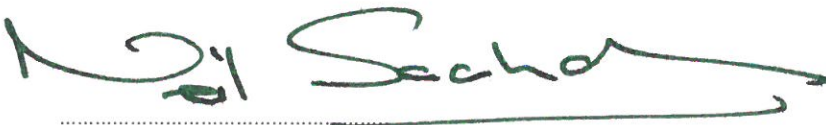
- Receive a copy of the company's Modern Slavery Statement;
- Receive further UK government guidance on modern slavery;
- Be referred to the relevant company policies, Code of Conduct and Staff Handbook stored on the shared drive.

We will assess the effectiveness of the above communication over the next 12 months and, if required, implement further training schemes.

It is our intention to roll out this information flow to our InvestmentNews and Last Word Media colleagues in the next 12 months.

10. Approval

The Board of Directors of Bonhill Group plc approved this statement at its Board meeting on 20th June 2019.



Director of Bonhill Group plc

