

# ITV Modern Slavery Act Transparency Statement

*March 2025*



# *Introduction*

ITV plc and our subsidiaries are committed to identifying, addressing and preventing modern slavery in our operations and supply chains in a manner that puts concerns for potential victims at the centre. We understand modern slavery to encompass slavery, servitude, forced labour, human trafficking, sexual exploitation and child labour. However, we also know that modern slavery is at the extreme end of a spectrum of labour rights issues and that we need to address labour issues well before they reach the threshold of modern slavery. For ITV, our most salient risks relate to poor labour practices in our supply chains.

This is our ninth modern slavery statement in which we set out the steps we have taken during the 2024 financial year in support of this commitment, pursuant to the UK Modern Slavery Act (2015).

# Our structure, business & supply chains

## Overview

ITV is one of the UK's best-known brands and one of the longest established television companies, formed through mergers of regional broadcast licence-holders. We have since expanded both organically and through acquisitions of production, distribution and digital content businesses and in 2025 will celebrate 70 years of ITV.

We are also one of the largest independent producers in the world, creating, producing and distributing a broad range of programmes. We have been growing internationally since 2012.

We are headquartered in the UK, with significant operations in the US, Netherlands, Australia, France and Germany. In 2024, we have faced a challenging financial environment amid budgetary pressures and the need for cost savings across the business.



- **Production:** ITV Studios' main business is creating, producing and distributing high-quality content for broadcasters and platforms around the world. We make around 6,000 hours of original scripted and unscripted programmes a year, across 60 labels in 12 different countries.
- **Media & Entertainment:** In the UK, ITV operates the largest commercial family of channels. We broadcast and commission news, sport, documentaries, entertainment, drama, comedy and children's programmes, distributing them via our channels and on demand through platforms such as ITVX. We also sell advertising space and programme sponsorship opportunities on these channels and platforms.
- **Distribution:** We distribute finished programmes and formats worldwide through licensees, including the sale of finished tapes of scripted and unscripted programmes to international broadcasters and issuing licences of TV formats, such as The Voice, internationally to independent third parties.
- **Brand and licensing:** ITV generates revenue directly from consumers through subscription video on demand (SVOD) on BritBox and ITVX, and by commercialising our intellectual property in ancillary categories, such as competitions, live events and set tour attractions, games apps, merchandise and pay per view events.



## Our colleagues

Our colleagues include permanent and fixed-term employees, freelancers (mainly in TV production) and people working at ITV sites on behalf of our suppliers, including those in cleaning, maintenance and catering.

In 2024, we employed 6,965 people globally, 5,519 people in the UK and a further 1,446 people across the US, Netherlands, France, Germany, Italy, Spain, Finland, Norway, Denmark, Sweden, and Australia. In the UK, we work with approximately 2,000-2,300 freelancers at any one time who are mainly involved in the production and broadcast of our TV programmes, as well as our contractor population.



## Our supply chains and partnerships

Across ITV we buy workplace and property services, technology and professional services. The majority of our spend in these categories is consolidated with larger suppliers, with which we have long-term relationships.

Within our Studios division, the main activity is TV production, which includes supply chains for clothing, equipment, props, set construction materials, vehicles and support services such as catering, cleaning, security, driving and set construction. These supply chains are more fragmented given the nature of local production requirements and many suppliers are small or medium-sized enterprises.

Within our Media and Entertainment division, we commission shows, where our

main suppliers are production companies. Our broadcast operations focus on getting programmes to air or making them available on our digital platforms and ensuring technical compliance for them. Our main supply chains for broadcasting include suppliers of IT support and infrastructure, data centres, transmission and distribution partners, software and technology contractors. This division also spends on marketing and production activities.

Within distribution, brand and licensing, we have supply chains for merchandise and for putting on live events. ITV also enters into sponsorship arrangements with other brands and licences with third parties (licensees) for the use of ITV's intellectual property to create, produce and distribute consumer products by the licensees on their own account.

# *Policies in relation to slavery & human trafficking*

## **Our operations**

All our policies flow from ITV's [Code of Ethics and Conduct](#), which makes specific reference to modern slavery in order to reflect ITV's proactive approach. The Code has been translated where required for all international markets in ITV Studios and communicated through ITV's Ambassador networks, senior management bulletins and CEO sponsorship to ensure that this is a 'tone from the top' message. Compliance with the Code is mandated in all employee and freelance contracts.

The Code explains ITV's aim to identify and address the risks of modern slavery in our operations and supply chains by conducting human rights due diligence on our business activities and relationships, reviewing our own commissioning and purchasing practices, engaging our

suppliers, partners and peers to find ways of working together to reduce risks, enabling workers in our operations, productions and supply chains to raise concerns by speaking up, listening to those potentially affected by poor labour practices and taking action to address the issues they flag, being victim-centric in our response. The Code also reflects ITV's Speaking Up and Procurement Policies, together with our commitment to equal opportunities, respect, dignity and understanding. This approach is aligned with the UN Guiding Principles on Business and Human Rights.

Supporting the Code, we have policies and guidelines on holidays, sick pay, unpaid work experience & placements, working conditions, disciplinary processes and speaking up. In 2024, we launched a new prevention of sexual harassment policy,

accompanied by training, and introduced a policy on personal relationships at work, which is now being rolled out. Each business area throughout our global operations has a dedicated Human Resources team to provide continuous support and guidance on all these policies. In 2025, we will continue to embed awareness of our policies across our global operations.

Since 2014, ITV has been accredited by the Living Wage Foundation as a voluntary Living Wage employer in the UK. This means that we pay all colleagues (permanent and fixed-term employees including apprentices, freelancers, contractors and agency workers) as a minimum, the hourly rate set independently and updated annually by the Living Wage Foundation, which is higher than the Government's National Minimum Wage and National Living Wage rates. We

undertake monthly checks on all UK employees of ITV using an automated report from the HR / Payroll system. Where there are any issues, such as someone receiving an hourly rate below the appropriate Living Wage, this is rectified in the next payroll run and backdated to the relevant effective date, with new contractual paperwork issued accordingly.

We have also standardised all our agreements so that anyone employed or contracted by ITV in the UK via a third-party organisation will receive the Living Wage. The Living Wage is a route to encouraging social mobility and access to the industry, particularly in higher cost of living locations. We do annual checks across key suppliers to ensure that increases in rates are applied.



## Production companies

Where we have direct control of a production company or a majority stake, we require them to adopt our policies and procedures in relation to modern slavery as set out in ITV's Code of Ethics and Conduct.

## Suppliers

Our [Supplier Code of Conduct](#) sets out the expectations that we have of our suppliers, including in relation to human rights and labour, and aligns with the International Labour Organization (ILO) core conventions. We have a [website for suppliers](#) that hosts all our policies, expectations and resources in one place. Suppliers are required to take steps to understand and address the risk of modern slavery occurring in their operations and supply chains. This includes ensuring

that workers are not illegal, forced, involuntary, bonded or exploited and are free to terminate their employment without fear of penalty. No worker should be charged fees or costs for recruitment or be required to lodge deposits, identity or travel documents. If potential victims are found, the Supplier Code of Conduct requires suppliers to prioritise their safety. We expect suppliers to notify ITV and work together to remediate any incidents of modern slavery.

Our Procurement Policy provides guidance to colleagues in assessing risks when bringing in new suppliers and points to specialist expertise across the business. It highlights low-cost labour as a particular risk area and requires enhanced due diligence of suppliers that use low-cost labour to deliver products and services to ITV.



# *Due diligence processes in relation to slavery and human trafficking in our business and supply chains*

## **Approach to risk management**

Across ITV, business divisions own the management of their risks and are responsible for:

- Identifying and reporting local risks
- Maintaining risk registers and business continuity plans where appropriate
- Implementing mitigating actions and controls

Business divisions are supported by Group Functions, which include Group Risk, Legal & Business Affairs, Corporate Compliance, Health & Safety, Procurement, People and Workplace Services. Identified risks are assessed and reported in line with ITV's Risk Management framework.

A human rights and modern slavery working group, comprising senior representatives from

multiple relevant functions, is responsible for implementing mitigations and reporting back on progress. Emerging risks are reviewed and addressed throughout the year. ITV's approach to human rights and modern slavery is ultimately overseen by the Board's Audit and Risk Committee (ARC).

In 2024, we strengthened our governance framework by streamlining various subject-focused forums and establishing a Risk Committee to oversee key risks and significant topics across ITV, including modern slavery. The committee is tasked with ensuring consistent risk evaluation, reducing fragmented reporting and enhancing risk prioritisation. With delegated authority from the Group Executive Committee, it is responsible for strategic decision-making, providing guidance and

recommending improvements within its remit. Throughout the year, no modern slavery issues or incidents were escalated to the committee.

## **Due diligence on our own workforce**

We conduct thorough recruitment processes for all roles, hiring directly wherever possible and we are confident that none of our direct employees managed through central systems are experiencing conditions of modern slavery. Where we use agencies, these are only for technical and highly skilled roles. Recruitment of some employees is not managed centrally but by subsidiary production companies, which are required to meet the same standards. We also provide a range of opportunities for people to raise concerns about themselves and others, which is

an important process through which ITV can get early warning of potential issues.

While we do not see modern slavery as a risk in our own workforce, we recognise that it is at one end of a spectrum of labour practices with decent work at the other. Our focus therefore is to strive for decent work and to address any labour issues we identify that fall short. In 2024, we improved our information on recruitment and developed more robust right to work checks, embedding these into our recruitment practices and using specialist support to validate documents. In 2025, we will roll these improvements out to freelancer recruitment.

TV production and broadcasting relies on engaging freelancers and subcontractors. Teams of people come together for the time it takes to make a programme or deliver a project



and then they move on to other programmes, sometimes with ITV and sometimes with other production companies. In our UK operations, only Approved Engagers can book freelancers. To become an Approved Engager a person must complete mandatory training which includes content on labour rights and the importance of the Living Wage, together with a module specifically on modern slavery. All Approved Engagers must complete annual refresher training.

The freelance nature of engagement in the TV industry can be both a benefit to workers, in terms of flexibility, and a challenge, due to the unpredictable nature of assignments. We continue to work on long-term improvements for freelancers, covering processes, systems and their experiences of working with ITV. We are also

represented on a new industry group Action for Freelancers<sup>1</sup>, which seeks to pool resources and deliver tangible outcomes for freelance workers.

In 2025, we will focus on the new Employment Rights Bill and seek to ensure that ITV meets its requirements under it.

## Due diligence on our suppliers

Our centralised Procurement function supports all of ITV's UK operations and operates a list of pre-approved suppliers for relevant spend categories. ITV's [standard terms of engagement](#) with suppliers require them to

- comply with all relevant laws, including modern slavery legislation;
- warrant that they have suitable practices and procedures in place to ensure that bribery, tax

evasion, human trafficking and modern slavery does not take place in their organisations or their supply chains;

- notify ITV if they become aware of any violations; and
- allow ITV to audit them to ensure that they are complying with modern slavery laws.

Implementation of our Supplier Code of Conduct is supported by our Vendor Risk Management framework. Our approach is that the Procurement team should be involved for all new supplier engagements with a value of over £100,000, or where risk is considered high according to defined criteria, to ensure appropriate pre-qualification questions are answered and evaluated. These suppliers are required to answer scoping questions that cover a broad range of risk domains, including modern slavery. Selected

suppliers will then receive a more detailed modern slavery questionnaire.

Cumulatively, 327 suppliers have now been through our updated due diligence process after being identified as potentially high risk or as part of a tender or reassessment process. Just over half of these were then required to complete the detailed modern slavery questionnaire. Part of our checks include a question about employing low cost (i.e. minimum or living wage) or zero-hour contract workers to supply products or services to ITV. Of the potentially high-risk suppliers identified, 94% stated they had no low-cost labour or zero hours workers in relation to ITV's supply chain and no concerns were identified for the remaining 6%.

In 2024, we continued to improve the way that questions are asked, moving away from

<sup>1</sup> For further information, see Broadcast Article: [“Revealed: fresh efforts to improve working life for freelancers”](#).





yes/no answers and free text boxes, which we found provided limited useful insights. Instead we require suppliers to identify from a list which practices they have in place. This is giving ITV better insight into the extent of modern slavery due diligence practices in our supply chain and it is a way for suppliers to see what other practices they might consider. Our review has found that 98% of suppliers that completed the detailed set of questions reported some form of good practice to address modern slavery and labour rights risks. For example, 66% reported having a person assigned to address modern slavery and 80% had made a real living wage commitment, including 63% that had passed the commitment onto their suppliers.

Where issues are identified with a supplier, it may be necessary for ITV to terminate the engagement and our standard terms include provisions

that would allow us to do so. However, we understand that in certain cases termination is likely to exacerbate the risk to already vulnerable workers. In these circumstances we would seek to work with suppliers to deliver compliant practice and use termination as a last resort. In 2024 our due diligence process did not uncover any issues or incidents of concern with existing suppliers but in some cases responses to our modern slavery questionnaire have contributed to potential suppliers not progressing.

During the year, we improved the tailored advice we provide to buyers in ITV. For example, we have developed a short, easy-to-read summary of risks to consider when working with suppliers. In addition, we have purchasing practices guidance for buying merchandise that aims to reduce the amount of merchandise overall. Where purchases are still required, ITV buyers are asked to put

sustainability and human rights considerations first and check that minimum criteria around the supplier can be met.

In 2025 we aim to improve our processes further with prompts at the point at which buyers are making decisions. This will include additional system controls to ensure buyers have followed the correct policies and engaged the relevant internal support teams. We expect this to help reinforce our policies and guidance among ITV's buyers.

## Due diligence within ITV Studios

For ITV's own productions, our risk management programme focuses on developing the right behaviours and aims to ensure that those in the business who are making decisions on

the ground are empowered to understand, own and manage the risks in the making of their content and are provided with the support and expertise to enable them to achieve this. This allows us to understand whether our policies and good practices are truly embedded and implemented. The focus is on encouraging openness and a culture of raising issues, gathering emerging themes and sharing lessons to drive continuous improvement. In addition, our 'Inside First' initiative promotes the use of ITV's internal facilities where we have better oversight of labour practices.

In 2024, we launched a new internal ITV Studios Supplier Network as part of our longer-term programme to build and evolve a resilient supply chain. The information, provided on a central portal, makes it easy for production colleagues to identify a handpicked selection of recommended suppliers in



different categories, where we have strong relationships and we have overarching frameworks in place. Our procurement team has been and will continue to conduct deep-dive key category reviews of production suppliers, which includes questions about labour practices to identify gaps and encourage improvement. In 2024, we initiated a review of post production suppliers, which we will continue into 2025. We also plan to take a closer look at studios and production services companies during the forthcoming year with an ongoing Supplier Relationship Management (SRM) approach.

A production portal is an important way for productions to align to our standards and policies and we have started to build this out into different languages and territories for our international labels and studios. For every new international label joining ITV,

we ensure that they have their own portal with relevant local legal requirements. By the end of 2025 our aim is that the majority of labels will have their own portals.

All ITV's productions are required to complete a series of questionnaires on a central database known as SPOT ('single point of truth'). In 2024, the system underwent a significant overhaul to improve its useability, which included a review to understand how best to identify and ensure mitigation of human rights risks. The improvements, which went live in November, mean we are now able to collate more comprehensive data on human rights risks, including in relation to welfare, safety, security and the extent to which a production will need low paid work, such as day labourers.

Any filming planned for high-risk jurisdictions is flagged internally to legal and business

affairs for additional support at an early stage. During the year, there were 18 productions flagged as high risk in relation to modern slavery before controls were applied. This is a slight increase on last year and correlates with an increase in production activity in cost-effective locations.

## Due diligence within our Media & Entertainment division

For commissioned programmes, we operate a Risk Management Tool (RMT) to track and collate risks related to productions. This enables internal teams to pick up potential risks related to health, safety, security, welfare, legal and regulatory. Language on modern slavery is also included in the pre-greenlight completion forms.

## Due diligence of our brand, licensing and sponsorship partners

In relation to partners, we are exploring ways to integrate them into our third-party risk management framework. We currently use a set of guidelines to support decision-making and, in the UK, we predominantly work with well-known brands. During the year, we have declined to work with brands where there have been serious ethical concerns. We are particularly proud of our partnership between eBay and Love Island, which began in 2022 and will have covered seven series by the end of 2025. The partnership has helped to raise the profile of pre-loved fashion.



# *Parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk*

In 2024, the challenging cost environment meant that some potentially higher risk projects, such as those involving construction, were put on hold. However, it has also increased labour rights risks in some areas where pressure to reduce costs is most likely to harm those who are already low paid. This year we have continued to focus on the supply chains for workplace services, TV production and merchandise as our priority areas for addressing potential slavery and trafficking risks.

## **Workplace Services**

ITV directly employs people to deliver a number of services which include reception/front of house, logistics, building maintenance and compliance and transport at our hub sites in London, Leeds and Manchester.

We also provide a number of these services at all the other circa 70 sites throughout the country from Edinburgh down to Jersey.

We work with suppliers for security, cleaning and catering, and understand that roles in these services are often at higher risk of poor labour practices. Accordingly, we manage our contractors closely, building strong relationships with them and checking their employees' terms and conditions and levels of pay to ensure that all workers are paid at least the Living Wage (as determined by the Living Wage Foundation). Our main labour risks relate to the need to cut costs across Workplace Services, where much of the work is based on labour costs and the workforce are in relatively low paid roles.

To address some of the risks to these workforces, ITV pays the Living Wage as soon as it is announced, without waiting until its formal introduction each April. In 2024, we extended the Living Wage rise to freelance drivers who provide vehicle support to productions. We also review the salaries of the managers and supervisors of those on the Living Wage and make sure they also get an increase that is agreed following the announcement.

We also build relationships with all those providing services to ITV sites and have followed up on pay queries and other labour rights with third party suppliers where there appear to be discrepancies. For example, during the year we were made aware of some security guards who were working long shifts

without adequate breaks. We were able to address the issue swiftly and are now looking into the root causes to understand how this happened. All the Workplace Services managers have completed training on modern slavery and they ensure issues relating to labour practices are covered in quarterly meetings with suppliers.

As well as managing our own buildings and contractors, ITV occupies a number of sites managed by landlords and we have contacted them all to request information about their Modern Slavery due diligence practices and whether or not they are a Living Wage employer. Around 50% have replied to confirm that they have a Modern Slavery Statement/Policy available and have confirmed their



Living Wage status. We are continuing to follow up with the remaining Landlords that are yet to respond and are hopeful of getting to 80% by the end of 2025.

In 2025, we plan to review all suppliers in Workplace Services to identify any risk areas not yet addressed and to ensure that we are clear on the potential human consequences of ongoing requirements to cut costs.

## TV productions, including sport and news

TV production covers our own business operations, through the shows that ITV Studios makes and broadcasts, and our supply chains, where we commission or buy shows from independent production companies. Through our own due diligence work and our involvement with industry bodies, we have identified that

labour risks predominantly relate to ancillary services that are subcontracted and where there is less oversight or control, such as cleaning, catering, security, driving and hospitality.

We continue to support the [TV Industry Human Rights \(TVIHR\) Forum](#), which focuses on understanding and addressing human rights risks in TV productions, by conducting research and developing tools and guidance which are then shared freely with the whole sector. In 2024, we participated in Forum meetings that covered issues such as location due diligence and human rights risks to contributors. We also engaged with a collaborative project on human rights with the Centre for Sport and Human Rights, research into labour conditions in post production and a survey of workers providing cleaning, catering, driving and security services to TV productions.

In terms of other relevant multistakeholder initiatives, ITV Studios is supporting:

- The TV Access Project to improve accessibility of TV productions
- Action for Freelancers to improve working conditions for freelancers in the industry
- Creative Industries Independent Standards Authority to develop minimum industry standards in relation to addressing bullying, harassment, inclusion and reporting concerns

In 2024, we completed six 'MOTs' on unscripted productions, such as Good Morning Britain and Come Dine With Me. These assessments found overwhelmingly positive attitudes among workers on these shows, with some suggestions for improvements to shift patterns and unsociable hours. Many of these have since been addressed, for example,

amending the shift rota for Good Morning Britain which involves a significant amount of night work. We also carried out participant surveys for those who take part in our shows and 100% of respondents gave maximum scores for enjoyment and said that they felt safe on set. In 2025, we have pledged to use the Film and TV Charity's [Whole Picture Toolkit](#) for mentally healthy productions on 80 productions.

In scripted productions, we have continued to promote ways for staff, freelancers and ancillary workers to speak out if they have concerns about themselves, other people or any issue which they believe needs escalating outside of the individual production hierarchy. These include ITV's Safecall reporting phone line plus we promote the use of the Call It! app, which gathers anonymous data regarding health and safety, safeguarding, working conditions and experiences



of bullying, harassment and discrimination.

ITV Sport broadcasts sporting events from venues around the world, including rugby, football, snooker and horse racing. The main risks of modern slavery are in relation to security and catering provided at venues and stadiums and over which ITV has no sight of pay and conditions. To address these challenges, we ensure that our crew on the ground know what to look out for and we report any potential issues back to the Federations responsible for the events. Working on sporting events can also involve long hours, with crew often outside in all weathers. We support our crews as much as possible with good quality hotels, catering and a culture that offers development and progression.

ITV News in the UK uses some well vetted security suppliers but no other ancillary services. In terms of other labour risks,

long working hours are part of many people's jobs and this is sometimes compounded by long travel times as crews cover large regional areas. They are encouraged to claim back time and days off in lieu. We also use our platform to raise awareness of the complexity of slavery and trafficking issues and have highlighted it in our news coverage, covering under-explored aspects of this topic. For example, ITV News undertook an investigation into seasonal workers in the UK: ["Seasonal workers at prestigious farm given 'cramped and undignified' accommodation"](#).

## Merchandise supply chains

Merchandise continues to be an area of modern slavery risk for ITV as some of it is manufactured in low cost countries.

We have one supplier of internal merchandise for ITV that has undergone considerable due diligence in terms of both human rights and sustainability. ITV's own merchandise purchases are a relatively small proportion of overall spend and we work to engage teams that place orders for merchandise to ensure they have understood and mitigated modern slavery risks. In 2024 we launched a new internal website for merchandise that includes a social purpose section and shows the location from where goods are sourced. This is enabling the business to switch out regularly bought items from high-risk locations and engaging employees on responsible sourcing practices.

We operate an online shop for members of the public to purchase programme-branded merchandise, which is run by a separate supplier. In 2025, we will be engaging more closely

with this supplier to further build our understanding of their due diligence processes.

Higher risk for ITV are the supply chains for our global merchandise deals, where we enter into licences with third parties (licensees) for the use of ITV's intellectual property for the creation, production and distribution of consumer products by the licensees on their own account. Whilst these licensees are not suppliers as such and ITV does not typically have a role in managing the creation and manufacture of the products, for any product licences with a value of over £50k, the licensees are required to complete due diligence questionnaires, which include questions that seek to identify where risks might be for modern slavery in terms of geography and business activity. ITV has a right to audit compliance with the licence agreement.

# *Training about slavery & human trafficking*

Across the business there is annual mandatory online training which covers modern slavery and Speaking Up, among other topics, and reminds colleagues of the policies in place. This helps us ensure that the highest standards of safety are maintained and that an ethical lens and good judgement are applied when making decisions. In 2024, there was a 90% completion rate for all training modules across our UK and international population. During the year we launched, to all employees and freelancers, a mandatory training module on human rights, including modern slavery and labour issues. This module used example scenarios to explain how to apply concepts from the UN Guiding Principles on Business and Human Rights and it had a 92% completion rate.

Our Human Resources teams receive annual training on modern slavery from an employment law firm. We also provide regular communications to all Approved Engagers to ensure that they understand good labour practices and risks around modern slavery. In 2024, we revised and improved the training available using a platform that enables regular communications around change, such as on Living Wage rates.

All crew and freelancers working on our scripted productions receive a presentation at the outset, together with a VT by talent, that explains ITV's Code of Ethics and Conduct on bullying, harassment, protected characteristics and behaviour on set, including treatment of ancillary workers.

In 2024, ITV's International Heads of Production received bespoke training on human rights and modern slavery risks and the human rights and modern slavery group participated in a refresher workshop on ITV's risks and responsibilities.



# Measuring our performance

In 2024, we continued to track a series of key performance indicators relating to our work on modern slavery.

What we are measuring	How we are measuring it (KPIs)	Performance in 2023	Performance in 2024
Awareness of modern slavery by employees through annual mandatory online training	Completion rate of annual mandatory online training (global figure)	90%	90%
Ability to raise concerns through the Speaking Up process	Percentage of employees who agree or strongly agree that “I know how to speak up and raise concerns” (Note: Full Engagement Surveys are issued every two years, with the next survey planned for 2025.)	89%	We conducted a short Pulse Survey as an opportunity for employees to let us know what needs to improve. We ran workshops with the Ambassador network to raise awareness of the Speaking Up portal, with a specific emphasis on confidentiality and anonymity. Qualitative feedback showed these were effective in improving confidence.
Implementation of our Living Wage commitment (UK)	Percentage of our fixed-term and permanent workforce on the real Living Wage <sup>2</sup> (as at Dec 2024)	2.8%	2.2%
Due diligence process for new suppliers	Cumulative number of suppliers that have gone through further due diligence as a result of elevated modern slavery risk	185	327
Risk assessment of productions	Number of ITV productions which triggered further due diligence as a result of a raised risk of modern slavery	16	18
Potential incidents of modern slavery	Number of concerns raised about potential modern slavery through our Speak Up channels	0	0

<sup>2</sup> As at December 2024 - National Living Wage is £12.60 per hour; London Living Wage is £13.85 per hour.

## Progress on commitments made in previous statement

Business area	Commitments made in 2023 statement	Performance in 2023	Performance in 2024
<b>Governance</b>	<ul style="list-style-type: none"> <li>Launch standalone mandatory training module on human rights for all employees and freelancers globally</li> </ul>	<ul style="list-style-type: none"> <li>Mandatory training module launched</li> </ul>	<ul style="list-style-type: none"> <li>Explore ways to strengthen how other types of third party, beyond suppliers, are incorporated into our third-party risk management processes</li> </ul>
<b>TV production</b>	<ul style="list-style-type: none"> <li>Integrate human rights and modern slavery considerations into start-up forums for productions</li> </ul>	<ul style="list-style-type: none"> <li>SPOT system relaunched to give a clearer view of human rights and modern slavery risks for productions – this system feeds into start-up forums</li> </ul>	<ul style="list-style-type: none"> <li>Look for opportunities to improve attention to labour practices in productions commissioned by our M&amp;E Division</li> </ul>
<b>Workplace Services</b>	<ul style="list-style-type: none"> <li>Investigate further the data provided by our landlords and how they evidence the responses from their own third-party suppliers</li> </ul>	<ul style="list-style-type: none"> <li>So far, c50% of landlords have confirmed that they have a Modern Slavery Statement/Policy available and have confirmed their Living Wage status. We continue to follow up with the remainder.</li> </ul>	<ul style="list-style-type: none"> <li>Conduct a review of suppliers in workplace and any associated labour rights risks</li> </ul>
<b>Merchandise and events</b>	<ul style="list-style-type: none"> <li>Embed human rights due diligence into licensing and sponsorship division</li> </ul>	<ul style="list-style-type: none"> <li>Limited progress made during the year</li> </ul>	<ul style="list-style-type: none"> <li>Create more awareness of due diligence processes among the team members dealing with merchandising and events</li> </ul>
<b>People</b>	<ul style="list-style-type: none"> <li>Improve data on all our people to help identify and manage risks and implement a series of improvements for freelancers as per our commitment to the Coalition for Change.</li> </ul>	<ul style="list-style-type: none"> <li>Long-term improvement plan in place and ITV is participating in the Coalition's replacement initiative, Action for Freelancers</li> </ul>	<ul style="list-style-type: none"> <li>Improve the global rollout of policies and ensure ITV meets all requirements of the new Employment Rights Bill</li> </ul>
<b>Procurement</b>	<ul style="list-style-type: none"> <li>Further refinement to supplier onboarding and risk management systems including issue resolution processes.</li> </ul>	<ul style="list-style-type: none"> <li>Improvements made to questions for suppliers, giving better data insights</li> </ul>	<ul style="list-style-type: none"> <li>Improve system controls at the point where buyers are making decisions to ensure potential risks have been appropriately considered.</li> </ul>





## Raising concerns

An important mechanism for tracking our effectiveness is through grievance channels and there are a range of ways in which people can raise concerns at ITV. Our Speaking Up process is available for all workers to access should they have any concerns about labour rights practices. It applies to workers beyond direct employees and to those outside the UK. We are explicit in our Code of Ethics and Conduct and relevant policies that retaliation or victimisation of anyone who raises concerns will not be tolerated.

We use Safecall, an independent third party, to provide a confidential Speaking Up telephone hotline and web-based reporting tool. The number is provided on daily call sheets at production sites. Details of the process is also included in mandatory annual training for all employees, as

well as for new joiners and freelancers at the start of each assignment. When a concern is raised, it undergoes an assessment to consider what action is appropriate, which can involve an informal review, an internal enquiry or a more formal investigation. Once this is complete, feedback is provided to the individual who raised the concern.

In 2024, we established a new People Relations team, improving our capacity to deal with employee relations issues, including freelancer concerns. This has included providing ACAS training to a group of managers, giving us a network of managers across the business who are able to hear and investigate grievances. Our Complaints Handling Unit within the Legal & Business Affairs team deals with issues related to talent. During the year, we also ran workshop sessions for ITV's Ambassador Network to demonstrate the

Safecall portal, explain how it works and to reinforce the confidentiality of the process. The feedback received from attendees was very positive and demonstrated that the sessions had helped to improve confidence in the system, with Ambassadors feeling better able to promote the portal.

Every two years, we run a full Engagement Survey, which includes questions to measure trust and awareness in our Speaking Up processes. The next one is due in 2025 but in November 2024, we ran a short engagement Pulse Survey which included three open ended questions for employees to feedback on:

- Tell us what we're great at
- Tell us what we're not so great at
- Is there anything else you'd like to add?

We also run a group of employee networks which provides other avenues for

people to raise labour rights concerns. These include the Ambassador Network comprising 110 colleagues (22 of whom are international), who represent each and every department in ITV. We also have five employee networks: the Women's Network, ITV Able, ITV Embrace, ITV Pride and ITV Balance.

In addition to our Speaking Up policy and employee networks, we also ensure that colleagues can speak up through a variety of mechanisms including:

- Informal conversations with line managers
- ITV's Talking Performance programme
- Employee Assistance Programme
- Talking to Human Resources
- Raising an issue with a member of the Management Board
- Raising a formal grievance



In 2024, we actively supported the Creative Industries Independent Standards Authority (CIISA) and participated in the development of the CIISA Standards. CIISA will provide another independent channel for people in the creative industries to report issues and concerns. It aims to uphold and improve standards of behaviour and to prevent and tackle all forms of bullying and harassment.

Beyond Speaking Up we have collective agreements with colleagues in certain areas of ITV and we consult with the Broadcasting Entertainment Communications and Theatre Union (BECTU), Unite and the National Union of Journalists (NUJ). We see good relationships with trade unions as an important mechanism for people to raise concerns about their labour rights.

In 2024, we did not identify any specific incidents of modern slavery despite a strong focus on areas of concern and no potential incidents were flagged through our Speaking Up channels. We continued to identify and address opportunities to improve labour practices in our operations and supply chains.

## *Useful resources*

**[Social Purpose at ITV](#)**

**[Speaking Up Policy](#)**

**[Anti-Bribery Policy](#)**

**[Climate Action at ITV](#)**

***Contact***  
**[procurement@itv.com](mailto:procurement@itv.com)**

*This statement has been approved by the Board of  
Directors of ITV plc on 25<sup>th</sup> February 2025.*



**Carolyn McCall**  
Chief Executive

This statement relates to the ITV plc Group, including the  
following key subsidiaries:

ITV Breakfast Limited  
ITV Breakfast Broadcasting Limited  
ITV Broadcasting Limited  
ITV Consumer Limited  
ITV Digital Channels Limited  
ITV Studios Global Partnerships Limited  
ITV Rights Limited  
ITV Services Limited  
ITV Studios Limited  
ITV2 Limited  
SDN Limited  
Twofour Broadcasting Limited  
World Productions Limited

