



Modern Slavery Statement

Financial Year 2025



Introduction

Newsprinters Holdings Limited ("**Newsprinters**") was established in June 2024 and, since our formation, it has been one of our priorities to ensure that we operate ethically, source responsibly and work to prevent modern slavery and human trafficking in our organisation and supply chain.

This statement is published in accordance with the Modern Slavery Act 2015 and highlights the key activities we have undertaken during our first financial year (the period from 3 June 2024 to 30 June 2025) to combat modern slavery in our organisation and supply chain.

References in this statement to modern slavery include modern slavery, slavery, servitude, human trafficking, forced or compulsory labour, and child labour as defined by the Modern Slavery Act.

Our business

Newsprinters is a United Kingdom based company providing print and distribution services to national and regional newspaper publishers.

Newsprinters operates from three print sites, located at Broxbourne and Knowsley in England and Eurocentral in Scotland. We have just over 300 employees and subcontract the provision of additional onsite manufacturing support staff. Newsprinters prints approximately 1.1 billion copies per year.

Our structure

Newsprinters is a joint venture with two shareholders - News Corp UK & Ireland Limited and Daily Mail and General Holdings Limited.

Newsprinters is governed by a board of Directors, appointed by our shareholders, who delegate management and operational control to a Senior Leadership Team. The Senior Leadership Team is responsible for identifying, assessing and responding to modern slavery.

Newsprinters' business is organised into the following areas:

- Operations and Production
- Logistics
- Central Planning
- Central Administration



- Technology and Engineering
- Commercial
- Project Management Office
- Facilities, including Security, Soft & Hard Services
- Procurement and Stores
- Health and Safety
- Finance
- Human Resources
- Legal

Our supply chains

Our key supply chains include the following products and services:

1. Ink
2. Printing plates
3. Printing and manufacturing related consumables
4. Manufacturing support products and services
5. Distribution services
6. Waste management and recycling services
7. Facilities management services
8. Back office support services

Our suppliers are predominantly based in the United Kingdom and Europe. Our goods and services are procured in accordance with our policies and procedures and governed by our standard terms and conditions or bespoke contracts.

Overview of modern slavery risks

Assessing risks

Modern slavery and other issues that relate to third party risk management, such as anti-bribery, form part of our ongoing assessment of risk in our operations and supply chains. Modern slavery risks in supply chains are assessed with regard to suppliers' geographic risk and risks associated with a particular industry



or product / service category, taking into account a range of sources including information obtained through supplier due diligence.

Risks in our operations

Our employees are predominantly full-time employees employed in accordance with UK employment laws and with the choice to be represented by an employee union. As a result, the risk that Newsprinters causes or contributes to modern slavery practices in our own operations is low.

Risks in our supply chains

We understand that the following areas give rise to the highest modern slavery risks in our direct or extended supply chains:

- The provision of small-scale distribution services
- The provision of certain printing and manufacturing related consumables
- The provision of certain facilities maintenance services

However, we have no evidence indicating that modern slavery practices are occurring in any of our supply chains in the reporting period. We will continue to assess higher risk industries and geographic areas which could be linked to modern slavery practices to minimise and prevent instances of modern slavery in any of our direct or extended supply chains.

Actions to address risks of modern slavery

Our Policies

We have appropriate policies in place that underpin our commitment to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our policies are circulated to all staff through our intranet and are regularly reviewed.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our supply chains. We also have the following policies in place which are relevant to modern slavery:



- Our Standards of Business Conduct sets out the ethical conduct required of directors, officers and employees of Newsprinters and anyone working on our behalf. It makes clear that we promote ethical business practices and policies to protect, as far as we are able, workers from being abused and exploited, and requires everyone working on behalf of Newsprinters to report potential violations, including circumstances that may give rise to a risk of modern slavery.
- Our Supplier and Third-Party Compliance Risk Management Policies set out the minimum requirements and responsibilities when engaging a third party on behalf of Newsprinters and the ongoing management of that engagement. These policies detail the risk assessments and compliance checks which must be undertaken to ensure that we only engage with third parties that comply with all applicable laws and regulations, and that meet our standards for ethical conduct.
- Our Whistleblowing and Grievance Policies encourage the reporting of suspected wrongdoing and provide guidance on how to raise concerns and reassurance that anyone raising genuine concerns under these policies will not suffer any detrimental treatment as a result.

Supplier due diligence

We recognise that it is crucial to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks. We have in place procedures and systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of modern slavery occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

We require all direct suppliers to be assessed by and registered in a due diligence management platform ("**Due Diligence Platform**"), or subject to a due diligence process of a similar standard. Suppliers are ranked according to various risk factors, including industry and geographical risk, allowing risk-based, proportionate due diligence to be conducted.

The Due Diligence Platform is configured to trigger additional questions to suppliers in certain service categories which have a higher modern slavery risk and escalate responses to appropriate advisers for evaluation and mitigation. These additional questions include the steps the relevant supplier has taken



to assess and manage modern slavery risk and whether there have been any instances of modern slavery identified in the supplier's business or its supply chain. Suppliers who trigger these additional questions are flagged and the supplier is required to agree to additional contractual representations with respect to modern slavery compliance.

We also use the Due Diligence Platform, or similar systems, to identify any "adverse media reports" about our suppliers, including any reports relating to modern slavery issues. Reported issues in respect of modern slavery in relation to our direct suppliers are brought to our attention to be resolved appropriately, including through enhanced modern slavery contractual provisions or alternative supplier selection.

Further Steps

As part of our initiatives to identify and mitigate risk we also:

- Require all supplier contracts to specifically stipulate the requirement for compliance with modern slavery legislation and provide for termination in the event of failures to comply.
- Provide staff training on our Standards of Business Conduct which highlights the importance of considering and reporting modern slavery risks.
- Provide all staff with access to a whistleblowing hotline to facilitate confidential reporting of illegal or unethical behaviour.
- Will carry out regular modern slavery risk assessments including identifying, assessing and managing the risk of modern slavery within our business and supply chains and engaging with workers and other stakeholders to inform our conclusions.

Remediation

We have not identified that Newsprinters has caused, contributed to, or been directly linked to adverse modern slavery outcomes in FY25. Accordingly, we have not identified any measures that we need to take to remediate modern slavery in our activities or in our direct supply chains.

We encourage staff and third parties to raise any concerns about illegal or unethical conduct, including modern slavery, through our whistleblowing hotline. Anonymity is available and our policy is that no one who, in good faith, reports any suspected problem or wrongdoing, or who assists in an investigation will



suffer retaliation or adverse employment consequences for having made such a report or for participating in an investigation.

Effectiveness

In assessing our effectiveness in combating modern slavery, we review the number of:

- employees who have received relevant online training modules;
- individuals who have received additional training on modern slavery; and
- third parties targeted for further modern slavery due diligence.

Further steps

We will periodically review the effectiveness of the steps we are taking to ensure the risks of modern slavery in our business, operations or our supply chains are addressed. Our aim is to continually monitor and, where necessary, improve any policies, procedures, and systems that we have already implemented.

Consultation and approval process

The Senior Leadership Team has been consulted as part of the preparation of this statement. The board of Directors of Newsprinters has, at a properly convened board meeting, viewed a copy of this statement and approved its signature by a Director.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Newsprinters' modern slavery and human trafficking statement for the financial year ending 30 June 2025. It was approved by the board of Directors in a duly convened board meeting on 29 October 2025.

A handwritten signature in black ink, appearing to read "Emma Humphreys", positioned above a horizontal dotted line.

Emma Humphreys

Director

NEWSPRINTERS HOLDINGS LIMITED

Date: 30 October 2025