

## Sermidigital Employee Policies

### Introduction

This statement sets out Sermidigital SRL's actions to understand all 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 own business and its supply chains. This statement relates to actions and activities during the financial year 2019.

Sermidigital SRL recognises that it has a responsibility to take a robust approach to slavery and human trafficking. While we believe that our commercial activities pose a low risk in this regard the organisation is 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

As noted above, as a company, we believe our commercial endeavours are low risk from the perspective of modern slavery as Sermidigital SRL activities are mainly based in Italy and are staffed and produced in line with Italian employment and broadcasting regulations.

Risk assessments are carried out for each production or service and will include an evaluation of the risk of slavery and human trafficking.

The most likely risk within Sermidigital SRL could arise from foreign filming to do with the engagement of international fixers and the relevant company policies set out ensure any such risk is identified and minimised.

### Relevant policies

Sermidigital SRL operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing policy** Sermidigital SRL 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. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Anti-Corruption policy** Sermidigital SRL is committed to promoting high standards of business integrity. No Sermidigital SRL employee may engage in corruption in any part of the world. Corruption includes bribery and giving or receiving an advantage in return for improper conduct. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. Any engagements for international fixers or experts (or any other self-employed workers) are sourced through reputable industry resources.

- **Living Wage** Sermidigital SRL is committed to ensuring that all employees including any work experience placements are paid at least the Living Wage.
- **Suppliers** Sermidigital SRL is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and

within the law in their use of labour. Should any areas of non-compliance be identified suppliers must permit Sermidigital SRL to review and execute an improvement plan. Sermidigital SRL may also terminate the contract with the supplier should they fail to comply with these obligations.

Should anyone engaged by Sermidigital SRL have any concerns whatsoever regarding modern slavery they can speak confidentially to the CEO or CFO who will investigate and take steps to rectify or minimise the risk of any potential issues.

This statement was approved and will be reviewed annually.

**SERMIDIGITAL S.R.L**

*Amministratore Unico*



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Marco Cunsolo

Chief Operating Officer Sermidigital SRL