

**Verizon Media**  
**UK Modern Slavery Act Statement**  
**for the Financial Year ending 31 December 2018**

## **1. Opening statement**

Verizon Media is a media and technology company operating a variety of content sites, search, communications and digital content products and advertising platforms that leverages data, content, and technology to connect publishers with their targeted audiences using its programmatic advertising technology. The digital world promises a better, more connected life, and we are delivering it. We make it possible for people to stay in touch and businesses to connect with their customers. We work better because our team is comprised of people from diverse backgrounds and experiences. At Verizon Media, we are committed to the highest standards of business conduct in our relationships with each other, our users, our stockholders and our customers, suppliers and partners.

We recognize that servitude, slavery, forced labour (including debt bondage) and human trafficking (collectively, for the purposes of this statement, “Modern Slavery”) are a global issue and that no industry is immune. Verizon Media is committed to preventing acts of Modern Slavery from occurring within its business and supply chain. As discussed below, our Supplier Code of Conduct specifically prohibits the use of involuntary labor, including bonded or indentured labor, in our business operations, including in our supply chain.

This statement is made in accordance with the Modern Slavery Act 2015 for the financial year ending 31 December 2018 and sets out the steps that Verizon Media has taken to prevent Modern Slavery in its business operations and supply chain. This statement also sets out some of the measures Verizon Media intends to take, including reviewing our processes and policies.

## **2. Structure of the organisation**

Verizon Media is a group of companies that includes Oath Inc. and the Oath (UK) Limited subsidiaries and affiliates, which operating companies are part of the Verizon Communications Inc. group of companies (“Verizon Group”).

In January 2019, Verizon Group announced that it was creating a “Verizon Media” group to include the companies previously operating as “Oath”. While this statement is submitted on behalf of Verizon Media, it also further describes actions taken by the Verizon Group on behalf of all of its subsidiaries, including its UK subsidiaries, in respect of supply chain due diligence.

To find out more about the nature of our business, please click <http://VerizonMedia.com>.

As an information and digital content delivery company, the majority of our procurement activities are related to the purchase from third party Suppliers of IT equipment, office related materials, and professional services. Verizon Media also has key agreements with various business partners in relation to search and advertising services, sales operations, technology and intellectual property licensing, and product development, promotion, and distribution.

In order to provide our services, we contract with a broad range of suppliers including technology solutions providers, professional services organisations, outsourcing specialists, network engineering Suppliers and facilities management Suppliers. Contracting with suppliers, and diligence activities with respect to our supply chains, are conducted primarily by functions at the Verizon Media corporate level.

## **3. Policies**

As part of our commitment to combating Modern Slavery, we have implemented and enforced the following policies:

Verizon Media uses the Oath Standards of Business Conduct. These standards define our ethical business practices, and are located here: <https://www.oath.com/standards-of-business-conduct/>

Our Supplier Code of Conduct (Supplier Code) defines the ethical business practices that our suppliers

must adhere to. Verizon Media uses Verizon's Supplier Code of Conduct, which is located at: <https://policies.oath.com/us/en/oath/terms/vendor/supplier-code-conduct/index.html>. In 2018, our Supplier Code was amended to strengthen our prohibition on forced labor, including through the inclusion of language specifically prohibiting the charging of recruitment fees and the withholding of passports and identify documents.

We make personal contact with our Suppliers as we conduct our due diligence review. This is our primary mechanism to ensure Suppliers promote ethical conduct in the workplace, safe working conditions and the treatment of workers with respect and dignity. It is our general practice to review the Supplier's business profile, and examine various risk factors to determine whether the Supplier is at risk for non-compliance with our policies and expectations.

Under the Supplier Code, Suppliers are required, and the public is encouraged, to report violations of the standards in our Supplier Code. Under the Supplier Code, Suppliers are further bound to prevent any retaliation against whistleblowers.

#### **4. Due diligence**

As part of our efforts to monitor and reduce the risk of Modern Slavery and human trafficking occurring within our supply chains, we have adopted the due diligence procedures described below.

Our procedures and policies are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistle-blowers

Verizon Media is engaged in an ongoing assessment of the nature and extent of its exposure to the risk of Modern Slavery occurring in its supply chain by reviewing, with our supervisory procurement personnel, areas of the Verizon Media supply chain that are: (i) international (ii) high-turnover in nature, and (iii) where Verizon Media has the greatest leverage to influence the actions of such supply chain. In most cases, the presence or degree of these factors guides the company's determination as to whether further diligence is necessary. In one example of the company's assessment efforts, Verizon Media determined that call center services represented an area of its supply chain that reflected certain risk factors. The company engaged in site visits, worker interviews, and an evaluation of employee development programs before determining that further diligence was not necessary as the risk of Modern Slavery was determined to be low.

In addition, Verizon Communications Inc. is a member of the Joint Audit Cooperation (JAC) program, an association of thirteen large telecommunications operators who share resources to develop and enforce standards and best practices within the information communication technology supply chain. The audit activities cooperatively assess and verify compliance with recognized labour, social and environmental standards, including with respect to forced labour, underage labour, and working hours. Reviews of pertinent records such as disciplinary log books, age/identity documents, facility rules and grievance records, along with worker interviews, make up part of JAC's audit process. Members of JAC fund shared assessments and audits of their common suppliers; audits are conducted by independent auditors. JAC reduces redundancy and increases efficiency in supply-chain audit approaches by auditing shared Suppliers once per cycle, using uniform protocols and methods.

#### **5. Risk and compliance**

As a result of the nature of our business operations we believe there to be a relatively low risk of instances of Modern Slavery in our business operations. Verizon Media acknowledges, however, that Modern Slavery is a global problem and that every industry is affected and every company needs to remain vigilant.

In general, we respond to suspected or actual violations of our Supplier Code in a flexible manner appropriate for the nature of the violation. While egregious violations can result in Verizon Media exiting a Supplier relationship, we intend that most suspected noncompliance will be addressed by investigation and where appropriate the establishment of a corrective action plan.

In our business relationships and procurement activities we take various steps through our contracts and agreements to prevent any complicity in Modern Slavery and seek to ensure that our Suppliers observe the same high standards that we expect. Verizon Media's Supplier Code requires compliance with applicable laws and regulations, as well as outlines our ethical values and expectations of integrity. As part of our onboarding process, Verizon Media also requires, where possible, that our Suppliers expressly acknowledge their receipt of Verizon Media's Supplier Code.

We also seek to ensure that our business development and procurement activities are further governed by Verizon Media's standard Supplier terms & conditions, where possible, which require that Suppliers comply with applicable laws and regulations.

## **6. Training**

Verizon Group delivered training in 2016, 2017 and 2018 to assist its business development and procurement employees in recognising the risks of Modern Slavery and human trafficking in our business and supply chains, and to assist in the risk assessment described above. As of 2018, most of the Verizon Media business development and sourcing personnel have been given such live training. The training also focuses on the business development and procurement teams' roles in interacting with Suppliers to improve our due diligence. The training is currently delivered in live sessions by members of our Legal team.

## **7. Further actions and sign-off**

Verizon Media is adopting a Supplier risk management tool and will consider ways to integrate controls relevant to Modern Slavery within it. The new Supplier risk management tool is anticipated to be live by Q4 2019.

Verizon Media will continue to diligently review and, where necessary, update our contracts, policies and training program, including a review of the Verizon Supplier Code and Verizon Media's Supplier and procurement policies. Verizon Media will continue to remain vigilant to identify and mitigate the risk of Modern Slavery in its business and supply chains and in particular will continue to monitor its operations in higher risk jurisdictions.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Verizon Media's slavery and human trafficking statement for the financial year ended December 31, 2018. This statement has been approved by the board of Oath (UK) Limited.

For and on behalf of  
Oath (UK) Limited



Stuart Flint