

Introduction

This statement sets out the actions taken by Encompass Digital Media Services Limited (“Encompass”) 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 the financial year ending 31 March 2021.

Structure, Business and Supply Chains

Encompass’ business is principally involved in delivering services in support of the processing, management and distribution of media content around the world on behalf of broadcasters. Encompass Digital Media Services Limited and its subsidiaries have 315 employees and a turnover of approximately £50m.

Key countries of operation and supply are the United Kingdom, North America, Latin America, Latvia, Singapore, Oman and Ascension Island.

As part of the global media industry, Encompass recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Encompass is committed to preventing such practices in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

As of 1 November 2020, Encompass Digital Media Limited and Encompass Digital Media Services Limited consolidated their business into one entity, being Encompass Digital Media Services Limited. This involved a comprehensive review of all policies, including those relating to modern slavery and human trafficking.

Relevant Policies

Encompass operates the following policies in 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** Encompass encourages all its employees, customers and other business partners to report any concerns related to its direct activities and supply chains. 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. Employees, customers or others who have concerns can discuss them in confidence with senior managers.
- **Employee Code of Conduct** Encompass’ code, in the form of an Employee Handbook which is distributed to every employee, makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Code of Conduct** Encompass is committed to ensuring that its suppliers adhere to the highest standards of ethics. A revised Supplier Code of Conduct was issued as part of the consolidation of the businesses will be issued to all suppliers as a standard requirement. Suppliers are required to demonstrate that they comply with anti-bribery and corruption legislation, provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Where necessary, the organisation will work with suppliers to ensure that they raise their standards to meet the expectations of the code and improve their workers’ working conditions. However, serious violations will lead to the termination of the business relationship.
- **Anti-Bribery and Corruption Policy** Encompass is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Its anti-bribery policy is made fully accessible to all employees and associated persons and subject to regular review, and clauses relating to anti-bribery and corruption are standard in both customer and supplier contracts.

- **Recruitment/Agency workers policy** Encompass uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Corporate Social Responsibility Policy** Encompass' day-to-day business is conducted according to rigorous ethical, professional and legal standards and all employees are made aware of the organisation's expectations via inclusion of its Corporate Social Responsibility Policy in its Employee Handbook.

Identifying and Assessing Risk

We consider that the risk of modern slavery is low within our business and supply chain, particularly given the requirement for specific technical skills in the delivery of the majority of our services, but we regularly review this assessment to take account of any change in circumstances.

Due Diligence

Encompass undertakes due diligence when considering engaging new suppliers. A review of existing suppliers was undertaken as part of the business consolidation process. The organisation's due diligence practices include commissioning third-party due diligence reports on both customers and suppliers and evaluating the modern slavery and human trafficking risks of each new supplier, taking into account particular product or geographical risks.

Effective Action Taken to Address Modern Slavery

No instances of modern slavery or human trafficking have been identified during the year.

Training and Awareness

All members of our senior management team have been briefed on understanding, identifying and mitigating against the risks of modern slavery and human trafficking and we continue to assess training needs for all relevant members of staff.

Board Approval

This statement was approved on 9 April 2021 by the Board of Directors of Encompass Digital Media Services Limited, who review and update it annually, and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.



Nick Thompson
Managing Director, EMEA
On behalf of Encompass Digital Media Services Limited
9 April 2021