

## Prevention of Modern Slavery Statement for the financial year ended 31 December 2020

### **Keywords Studios' Organizational Structure and Business**

Keywords Studios is a public limited company, headquartered in Dublin, Ireland. Our delivery facilities are located in over 65 locations in 21 countries and 4 continents. Our Company workforce consists of employees providing professional services to the games and related industries, as an international technical services provider to the global video games industry, with 61% of those located within the EU, UK and North America, 69% are located in studios in low risk countries according to the 2018 Global Slavery Index. Clients engage with us at the individual Studio level, by Service Line or across service lines at the Group level. Our supply chain is mainly made up of freelancers who supply professional services, software and IT equipment providers.

### **Our Policies on Slavery and Human Trafficking**

At Keywords, we do not tolerate any form of modern slavery or human trafficking in any part of our business. We operate to international standards and principles including the International Bill of Human Rights, the UN's Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Children's Rights and Business Principles.

Keywords Studios and any of its subsidiary or associated companies acknowledges global responsibility and is committed to driving out acts of modern slavery and human trafficking from within its own business and supply chains. Keywords acknowledges its responsibility under relevant National Modern Slavery Acts and will ensure transparency is achieved within the organization to ensure that awareness of the Acts is achieved on a consistent basis.

Our Prevention of Modern Slavery Policy statement is available on the Company website for the Group and readily available to all employees. Our Whistleblowing, Anti-Bribery and Grievance Policies also provide processes for employees to report of any concerning incidences and/or suspicions, including those that could be related to this subject matter. These and other ethical policies and expected behaviours are outlined in the Keywords' Code of Business Conduct available on our group website ([www.keywordsstudios.com](http://www.keywordsstudios.com)).

### **Due Diligence**

Keywords Studios will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of forced, compulsory/bonded labour or human trafficking by implementing this statement and the accompanying Code of Conduct for Suppliers. Adequate resources will be made available to ensure slavery and human trafficking are not taking place within our organization or to the best of our knowledge within our supply chains. Our Prevention of Modern Slavery policy is shared with each new studio that joins Keywords Studios and is shared annually with every studio. Due diligence is conducted with each new supplier. Within the policy is a Supplier Code of Conduct, which is signed by each of our suppliers.

**Risk Assessment**

We continue to take positive steps to improve transparency within our Company. Following the annual review of our policy and processes, we believe that we operate with a very low inherent risk of slavery and human trafficking potential. Nevertheless, this assessment is kept under continual review. We will continue to assess and manage the risk as part of an annual review of our policy.

**Effectiveness**

Keywords management team is responsible for the ongoing review of this document, the Prevention of Modern Slavery Policy and the Code of Conduct for Suppliers. This will be carried out annually or as and when organisational changes impact the way the company works. While we do think we are low risk, we will keep this under constant review. During 2020 no instances of modern slavery were reported or identified.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Keywords Studios' slavery and human trafficking statement for the 2020 financial year which ended on 31 December 2020.

This statement has been approved by the Board of Directors on 15 March 2021, and signed off by the Joint Interim Chief Executive Officer.



**Jon Hauck**  
**Joint Interim Chief Executive Officer**  
**Date: 15 March 2021**