



**Keywords
Studios**
Imagine More

Version: 0.3

Last Amendment:
November 2023

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November 2024

**Prevention of Modern Slavery
Policy**

Department:
People & Culture

GLB-HR-23-11-INT

Contact:
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To be read in conjunction with:
Protected Disclosures (Whistleblowing) Policy

CONFIDENTIAL AND PROPRIETARY

Document History


Date	Version	Description	Author
01/01/2018	0.1	First Draft	Gerry Cleary
12/16/2019	0.1	Reviewed, no changes	Gerry Cleary
12/14/2020	0.1	Reviewed and Approved	Audit Committee
11/29/2021	0.2	Replaced 'company' with 'group'. Section 8/Further steps adjusted to include our annual process.	Gerry Cleary
13/11/2023	0.3	Minor changes and design update	Ekaterina Ustina
13/11/2023	0.3	Reviewed and Approved	Risk & Compliance Committee



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APPENDIX 1 - GUIDELINES: CODE OF CONDUCT FOR SUPPLIERS AND CONTRACTORS TO KEYWORDS STUDIOS AND ALL GROUP COMPANIES

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1. AIMS

Keywords Studios is opposed to slavery and human trafficking in any part of our activities or supply chain. We are committed to ensuring that we have appropriate policies and procedures in place to identify and prevent these practices.

2. SCOPE

The Prevention of Modern Slavery policy applies to all employees of Keywords (the “Group”).

3. REVIEW

The management team is responsible for the ongoing review of this document. This will be carried out annually or as and when organisational changes impact the way the group works. An amendment record will be maintained to document the changes made in each new issue.

4. FEEDBACK

Feedback regarding this document should be directed to any one of the department managers.

5. INTRODUCTION

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 day 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 organisation to ensure that awareness of the Acts is achieved on a consistent basis.

Keywords Studios will make reasonable endeavors to ensure all employees and agents within our supply chains are not subject to any form of forced, compulsory/bonded labor or human trafficking. Adequate resources will be made available to ensure slavery and human trafficking are not taking place within our organisation or, to the best of our knowledge, within our supply chains.


This Statement and associated documentation will be reviewed annually.

6. DEFINITION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. People in these situations of exploitation cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

Forms of modern slavery:

- Forced labor
- Debt Bondage
- Human Trafficking
- Descent-based slavery
- Child slavery
- Forced and early marriage

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7. DUE DILIGENCE PROCESS AND MITIGATION RISK

As part of our efforts to identify and mitigate risk, we will assess our supply chains and our agency labour providers. We will put in place systems to:

- Identify, assess and monitor potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Drive best practices in tackling modern slavery and human trafficking
- Protect whistleblowers through our Whistleblower (Protected Disclosure) Policy
- Make available Code of Conduct to Suppliers and Contractors (See guidelines below)

8. FURTHER STEPS

Keywords is committed to maintaining high ethical standards, protecting human rights, and acting with honesty and integrity in everything we do. We endeavor to understand where there are risks of modern slavery within any part of our business and supply chain so that we can address them appropriately and sustainably.

We will continuously review our policies and develop key performance indicators (KPIs) to ensure that we are measuring how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

Once a year, our policy is shared with our studio locations. We confirm at that time that all suppliers have signed off on our policy and we secure documentation for audit purposes.

9. RESPONSIBILITIES

The Chief People and Culture Officer is responsible for implementing, maintaining and interpreting this document.

10. GUIDELINES: CODE OF CONDUCT FOR SUPPLIERS AND CONTRACTORS

An approved supplier must adhere to the following provisions while providing services to Keywords Studios or any of its subsidiary or associated companies:

1. Forced involuntary labor

Workers will not be subject to any forms of coercion. All work must be voluntary. Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws and collective agreements.

2. Document retention

Confiscating or withholding worker identity or other valuable items, including work permits and travel documents (e.g. passports) is strictly prohibited. The retention of personal documentation shall not be used as a means to bind workers to employment or to restrict their freedom of movement.

3. Humane treatment

The workplace shall be free from any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers and shall not include any inhumane disciplinary measures, including mental or physical coercion or verbal abuse of workers. Threats of physical or sexual violence, harassment and intimidation against workers, their family and close associates are strictly prohibited.

4. Workers Equality


All workers shall be treated fairly and equitably. Workers shall be able to report grievances to their employers about their treatment and conditions and they will not face retaliation for raising a grievance.



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5. Freedom of Movement and Personal freedoms

Workers’ freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises nor shall any other means of coercion be used to restrict their freedom of movement or personal freedom.

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APPENDIX 1

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We agree to abide by the above code of conduct

Supplier Name _____

Supplier Director _____

Date _____