

## PREVENTION OF MODERN SLAVERY

### CODE OF CONDUCT FOR SUPPLIERS AND CONTRACTORS TO KEYWORDS STUDIOS LIMITED AND ITS SUBSIDIARIES (the “Code”)

Keywords Studios Limited and its subsidiaries (collectively, “**Keywords Studios**”) are opposed to slavery and human trafficking in any part of our activities or supply chain. Following the implementation of the UK’s Modern Slavery Act 2015, we are further committed to ensuring that we have appropriate policies and procedures in place to identify and prevent these practices and we have outlined our approach to tackling this important issue below.

This Code, which is incorporated into our standard vendor services agreement, sets out the minimum standards expected from our suppliers and contractors in order to manage the impacts of our operations in a responsible manner. It is based on international standards, including the International Labour Organization Conventions (the “**ILOC**”).

An approved supplier or contractor must adhere to the following provisions while providing services to any member of the Keywords Studios’ group:

#### 1. **Forced involuntary labour**

The supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes and regulations from time to time in force, including the Modern Slavery Act 2015 in any part of its supply chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour. All work must be voluntary. Workers must have the right to terminate their employment freely, as appropriate, after 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 supplier shall provide a safe, healthy and sanitary working environment 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 equally. Suppliers shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement or any employment practice based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership or political affiliation or any other characteristic other than the worker's ability to perform the job subject to any accommodations required or permitted by law. 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.

#### **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.

#### **6. Working hours and wages**

All applicable laws and industry standards including, but not limited to, the ILOC, on employee wages, benefits and working hours should be adhered to in all countries of operation, without any unauthorised deductions.

#### **We agree to abide by the above Code**

Supplier Name: \_\_\_\_\_

Supplier Signature: \_\_\_\_\_

Date: \_\_\_\_\_