



MODERN SLAVERY POLICY

1. Policy statement

- 1.1 Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, involving adults or children, 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 ("**Modern Slavery**").
- 1.2 Winvia Entertainment plc (company number 03755182) (the "**Company**") and its subsidiaries from time to time (together, with the Company, the "**Group**") is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls in accordance with the UK Modern Slavery Act 2015 to ensure modern slavery is not taking place anywhere in our own Group. The Company expects the same high standards from all of our contractors, suppliers and other business partners and that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy sets out the Group's commitment to:
 - (a) responsibly source goods and services to use in our business;
 - (b) ensure there is transparency in our approach to tackling modern slavery in our own business and throughout our supply chains;
 - (c) take action to prevent, mitigate and where appropriate, remediate the harm caused by modern slavery occurring in our business or supply chains; and
 - (d) comply with applicable laws and regulations including under the UK Modern Slavery Act 2015.
- 1.4 This policy (including any updates) must be complied with and incorporated into the policies, procedures and operations of our own business and our supply chains.
- 1.5 This policy applies to all persons working for us or on our behalf in any capacity, including (but not limited to) employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, supply chain participants and business partners.

- 1.6 This policy does not form part of any employee's contract of employment nor existing or future contractual arrangements with our contractors, suppliers and other business partners (unless agreed) and we may amend it at any time.
- 1.7 As part of the implementation of our policy commitment concerning our operations and supply chain, our contracting processes will be based upon a risk based approach to identifying and assessing the risk of modern slavery and including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children or other requirements, as appropriate.

2. Responsibility for the policy

- 2.1 The Board of Directors has overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations, and that those under our control seek to comply with it.
- 2.2 The Compliance Officer is responsible for the day-to-day implementation of this policy, monitoring its use and effectiveness, dealing with any queries about it, and maintaining internal control systems and procedures to ensure they are effective in addressing the risks of Modern Slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 2.4 Employees and contractors are responsible for understanding this policy, adhering to its principles, and reporting any suspected risks of modern slavery.
- 2.5 Suppliers are responsible for ensuring their employees and suppliers involved in the supply of goods or services to us understand and comply with this policy.
- 2.6 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group's head of legal.

3. Compliance with the policy

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us (for example, our employees and contractors), on our behalf (for example, our suppliers) or under our control (for example, our subsidiaries). You are required to

avoid any activity that might lead to a potential or actual breach of this policy or relevant laws making modern slavery an offence.

- 3.3 You must notify the Compliance Officer at mihai.zdrobeu@wow365.com as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future so that we can consider and/or take appropriate steps which aim to address any risks of engaging in Modern Slavery.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help address coercive or exploitative work practices in their own business and supply chains.
- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within our business or any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Compliance Officer at mihai.zdrobeu@wow365.com.
- 3.7 The Group is committed to fostering openness and will support anyone who raises genuine concerns in good faith under this policy, even if those concerns turn out to be mistaken. Each member of the Group is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Officer immediately at mihai.zdrobeu@wow365.com. If the matter is not remedied, and you are an employee, you should raise it formally using the process set out in our Grievance Policy.

4. Communication and awareness of this policy

- 4.1 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all contractors and supply chain participants at the outset of our business relationship with them and reinforced as appropriate thereafter (including by way of obligations included in the supply contract).

5. Breaches of this policy

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 Each member of the Group reserves the right to terminate relationships with individuals or organisations acting on its behalf (including agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives) if they are found to be in breach of this policy.

6. Review of this policy

This policy will be reviewed annually and may be updated from time to time. All updates must be complied with by the Group and its stakeholders.

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