



# Anti Modern Slavery Policy Statement

This statement is our response pursuant to Section 54 (1) of the Modern Slavery Act 2015 (the 'Act') and sets out the steps that Team17 Group plc ("Company or Group") is taking to ensure slavery and human trafficking is not taking place in any part of our business nor in our supply chains. This statement covers all entities that sit under Team17 Group plc, as the legal parent entity and was approved by the board of directors on 7 June 2023.

## About us

Team17 Group plc is a global games label, creative partner and developer of independent ("indie") premium video games, developer and publisher of educational entertainment ("edutainment") apps for children and a leading working simulation games developer and publisher. The business has nearly 450 employees in 5 locations/remote working under hybrid arrangements across the UK, Ireland, Germany, USA and Canada.

## Our approach

Team17 Group plc does not tolerate any form of modern slavery or human trafficking in any part of our business. As a UK-centred video games developer and publisher computer gaming business, the Group has a relatively low risk of modern slavery within its employee base and relatively small supply chain.

Should anyone within our Group have any concerns and/or suspicions, including those that could be related to this subject matter; our Whistleblowing, Anti-Bribery and Grievance Policies also provide processes for employees to report on any concerning incidences which can be raised through either HR or contacting in written form or calling Safecall (the Group's external third-party hotline provider).

## Our supply chain

In 2022 the majority of our spend with external partners was made up of milestone payments to 3rd party development partners for new titles in development as well as royalty payments for completed and released titles.

In addition to the 3rd party development partner payments, the Group utilises external work for hire companies that cover a range of activities covering game development, localisation and quality assurance testing as part of the overall game development process.

To continue our efforts, all new contracts and those renewing, will include a clause requiring that our suppliers, and their subcontractors, comply with the Act, and include the companies right to terminate in the instance of any breach of this obligation.

## Due Diligence

Team17 Group plc will make reasonable endeavours to ensure all employees and agents within our Group supply chain are not subject to any form of forced, compulsory/bonded labour or human trafficking by implementing this statement. 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 division that joins Team17 Group plc.

## Risk assessment

As a game developer business, Team 17 Group plc does not have significant physical inputs into its business operations, but we understand that no supply chain is risk-free, and that greater risk may be present further down the supply chain. We continue to follow a risk-based approach to our supply chain.

The majority of our supply chain retained a low risk of modern slavery however, a couple of areas were considered to carry a slightly higher risk which are QA testing and localisation, and we will continue to assess and manage the risks in these areas on an ongoing basis as part of the Group's overall risk register assessment review process which is carried out annually with a mid-year review.

Additionally, we emphasize the importance of transparency and accountability. Therefore, our annual report, which includes the assessment of risks and our approach to support our internal teams and each of our stakeholders is published on our company's website. We believe that this regular reporting contributes to our commitment to combat modern slavery and ensure responsible practices throughout our businesses and supply chain.

## Governance

The boards of directors of the division entities are in scope for this statement and approve the information disclosed in this statement.

Operational responsibility for reviewing our approach to modern slavery sits with our Audit Committee, which reports into the board at least twice per year.

For employees, suppliers, clients and third parties our whistleblowing policy encourages and enables reporting on anything of concern and explains how they can do so confidentially. Concerns by employees can be raised through our HR teams or contacting our external third party provider in written form or calling directly.

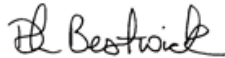
## Awareness and Training

We raise awareness among our employees, suppliers, and stakeholders of the risks of modern slavery and human trafficking, and the steps we are taking to prevent it. We are committed to providing necessary and appropriate training to all employees and suppliers to ensure that they understand their responsibilities effectively and how to appropriately identify and report any potential instances of modern slavery or human trafficking.

We have adapted and re-promoted our existing corporate policies to address modern slavery and human trafficking where relevant, including our whistleblowing policy which allows employees to report any concerns confidentially.

## Our Commitment

Team17 Group plc continues to take positive steps to improve transparency within our divisions. The board of directors believe that the Group operates with a very low inherent risk of slavery and human trafficking potential. Nevertheless, this assessment is kept under continual review. The board of directors are responsible for the ongoing review of this document, the Prevention of Modern Slavery Policy. This will be carried out annually or when any organisational changes arise that may impact the way the Group operates.



**Debbie Bestwick**

Team17 Group plc, Chief Executive Officer

Date: 22 June 2023