

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This has been prepared for Big Fish Group in respect of the financial year ending 31 December 2024

## **1 POLICY STATEMENT**

1.1 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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to Staff, and all all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any Staff member's contract of employment or engagement and we may amend it at any time.

## **2 RESPONSIBILITY FOR THE POLICY**

2.1 Our Managing Director, Kerry Moston has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 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 compliance manager.

## **3 ACTIONS WE TAKE TO HELP IDENTIFY AND ERADICATE MODERN SLAVERY MAY INCLUDE:**

3.1 Conduct robust due diligence when establishing relationships with agencies:

- (a) Establish in particular that the VAT number being used is legitimate.
- (b) Ensure that the organisation has never been convicted of offences relating to modern slavery.

3.2 Conduct regular checks into agencies which we have ongoing relationships with to ensure that they are continuing to comply with relevant legislation and preventative measures to combat modern slavery.

3.3 Ensure that each individual on the payroll is being paid into a separate bank account and that the name on the account matches the name of the individual.

3.4 Provide training for staff in identifying the signs of modern slavery and human trafficking, and what steps should be taken if exploitation is suspected.