



Modern slavery statement

Organisation

This statement applies to **Esdevium Games Limited** which was acquired by Asmodee UK Holding Limited on 5th August 2020. The information included in the statement refers to the financial year ending 31st December 2020.

Organisational Structure

We are an established UK-based distributor of games, collectibles and toys both domestically and across Europe. Established over 30 years ago, the Company became part of the Asmodee Group in 2010. The Asmodee Group is a leading international games publisher and distributor with operations located in Europe, North America, South America and Asia.

We are based in the South East of England and our operations currently run from three sites in Hampshire. Two of our offices are located in Alton and house the Commercial and Support Functions. Our Logistics Operations are located in Bordon.

We release new products every week and perform our distribution activities direct to retailers via telephone orders. Demand for our product is steady throughout the year with seasonal peaks during March/April and October to December.

The labour supplied to us in pursuance of our operation is based in the UK.

Definitions

The Company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

We acknowledge our responsibilities in relation to tackling modern slavery and commit to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both our internal practices in relation to our labour force and additionally, our supply chains.

We do not enter into business with any other organisation in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to our responsibilities under relevant employment legislation in the UK.

Supply Chains

In order to fulfil our activities, our main supply chains include those related to the supply and distribution of games, collectibles and toys from various global suppliers. These include publishers, fulfilment centres/houses and manufacturers.

We understand that our first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers. The Company uses a direct and formal vetting process for suppliers and third parties through a due diligence process.

We consider our main exposure to the risk of slavery and human trafficking to exist in our supply chains if they involve the provision of labour in countries where protection against breaches of human rights may be limited. In general, we consider our exposure to slavery/human trafficking to be limited. Our approach is under regular review and we will proactively respond in the future if we have cause for concern.

The Organisation has not to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In addition, Esdevium Games Limited is a signatory of the British Toy & Hobby Association (BTHA) Code of Practice. We are committed to buying only from suppliers who abide by appropriate ethical standards in the factories used for product manufacture. We are also committed to minimising the negative environmental impact of our business.

The BTHA Ethical Manufacturing Code of Practice can be viewed here:

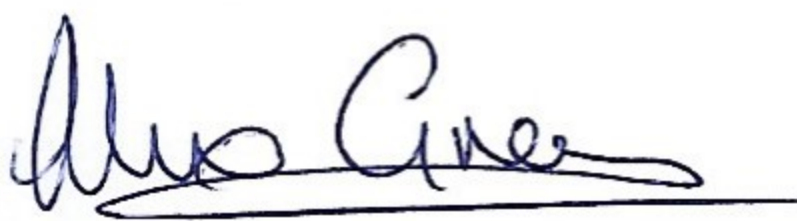
<https://www.btha.co.uk/guidance/ethical-manufacturing/>

Policies

As an employer we run the Company in an ethical manner, with an emphasis on respectful working relationships with our employees, and have policies in place protecting against discrimination, ensuring dignity at work and the health and safety of our employees, all of which are easily accessible in the Employee Handbook.

All employees must complete Code of Conduct Training to ensure the highest ethical standards. Recent mandatory Code of Conduct training has included Workplace Harassment, Anti-Bribery and Corruption and Cyber-Security. Additional training has been provided on Mental Health Awareness, Managing Remote Teams and People Management. A Whistleblowing Procedure is in place for employees to report any concerns.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year. This statement has been approved by the Board of Directors.

Signed: 
Print name: A. R. GREEN
Job Title: MANAGING DIRECTOR
Date of approval: 29-JUNE-2021.