



## Modern Slavery and Human Trafficking Statement

---

This statement, made in accordance with section 54 of the Modern Slavery Act 2015, sets out the policies adopted and steps taken by Vue International to:

- assess the risk of modern slavery or human trafficking occurring within our business or supply chain;
- prevent any instances of modern slavery or human trafficking occurring within our own business; and
- ensure that every supplier with whom we do business is taking appropriate steps to ensure that modern slavery or human trafficking does not occur within their business (or their own supply chain).

In this statement, the term “Vue International” refers to Vue International Holdco Limited and all of its subsidiaries.

### Our business, structure and supply chain

Vue International is one of the world's leading cinema operators, managing a number of the most respected brands in major European markets and Taiwan, spanning nine countries, 226 sites and 1,980 screens (as at July 2020). Vue International has leading positions in the United Kingdom, Ireland, Germany, Denmark, the Netherlands, Italy, Poland, Lithuania and Taiwan.

Each of our brands operates as a separate business unit, with local management in each jurisdiction reporting to the Vue International head office located in London.

Our suppliers and contractors include providers of food, drinks, uniforms, technical equipment, cleaning and facilities management services, property maintenance and construction services, and other professional service providers (such as architects, lawyers, accountants and auditors).

### Vue International policy statement

Vue International does not and will not tolerate modern slavery or human trafficking in any aspect of our business, and expects its suppliers to uphold the same zero-tolerance standard (regardless of the nature, scale or jurisdiction of their business).

### Supplier diligence

Vue International is in the process of formalising and rolling out a revised Procurement Policy (building on existing procurement practices already adopted by the group). That Policy will codify the existing Vue International requirement that, before being engaged to provide any goods or services to any part of our business, any potential supplier must, including but not limited to, provide us with the following:



- confirmation that no instance of modern slavery or human trafficking has occurred (or is occurring) within their business;
- information about the steps they have taken to ensure that no modern slavery or human trafficking has occurred (or is occurring) within their own supply chain; and
- such further information or evidence as we may reasonably request in relation to that potential supplier's policies and processes in relation to modern slavery or human trafficking.

Our Group Procurement team (in the case of group-wide supplier arrangements) or the local Head of Procurement or Head of Retail (in the case of territory-specific supplier arrangements) will assess the information provided. The Procurement team(s) will then form a view as to whether the potential supplier has appropriate and robust modern slavery and human trafficking policies and procedures in place. Where necessary, we will request further evidence or information, or will arrange for site visits to inspect the manufacturing facilities of individual suppliers.

In the event that we are not able to satisfy ourselves as to the adequacy of modern slavery and human trafficking policies or procedures of a potential supplier, we will not conduct any business with that supplier. Were we to discover any evidence, or have cause for suspicion, that any instance of modern slavery or human trafficking has occurred with any of our existing suppliers, we would report this to the appropriate legal authorities.

Where any member of the Vue International group enters into a contract with any supplier for the provision of goods and services, we will always seek to ensure that such contract contains an obligation on the supplier to comply with applicable modern slavery and human trafficking prevention laws and regulations, and to maintain appropriate and robust policies and procedures in that regard.

It is intended that each of the territories forming part of the Vue International group will have formally adopted (and taken steps to implement) the revised Vue International Procurement Policy before the end of the financial year ending 30 November 2021.

The Group Procurement team continues to liaise with existing suppliers to ensure compliance with our modern slavery and human trafficking policies. In 2019, the Group undertook an internal risk assessment of existing suppliers in relation to modern slavery and human trafficking. In accordance with Vue International policies on prevention of modern slavery and human trafficking, Group Procurement has commenced a review to reaffirm that our key suppliers are compliant with all applicable laws and regulations in relation to these matters.

### **Supply chain risk analysis**

Generally, we consider the risk of modern slavery or human trafficking occurring within our supply chain to be low. The principal reasons for this are that:



- the large majority of our suppliers are large international organisations with comparatively robust and sophisticated prevention and compliance policies (overseen by professional compliance teams) in relation to modern slavery and human trafficking; and
- many of our suppliers operate in industries which receive a relatively high degree of independent regulatory scrutiny (for example, our suppliers in the food and drink supply and manufacturing industry).

However, if we identify a supplier (or potential supplier) with higher risk characteristics in relation to modern slavery and human trafficking, they will be subjected to a higher degree of scrutiny as part of the Vue International procurement process. Characteristics indicating a need for such enhanced scrutiny may include, but are not limited to, the following:

- the smaller scale of the supplier's business meaning that their internal policies and processes in relation to modern slavery and human trafficking are less well developed;
- the operation of manufacturing or processing facilities by a supplier in countries with higher levels of estimated modern slavery (as determined by the Global Slavery Index 2018); or
- a supplier's reliance on supply chains with considerable geographic or operational complexity, resulting in challenges for consistent application and monitoring of relevant policies.

### **Effectiveness of the policies and strategies**

At no time since its formation has Vue International encountered, or been the subject of any allegations or complaints of, any occurrence of modern slavery or human trafficking within its business or supply chain.

Whilst this is encouraging, we acknowledge that we have a continuing obligation to ensure that our relevant policies and strategies remain fit for purpose as the scale of our business and operations develops over time.

### **Employee awareness and training**

Vue International has adopted a Whistle-blowing Policy, the details of which are available to all employees. This Policy details how any employee with concerns about a potential issue (which may include potential occurrences of modern slavery or human trafficking) should bring the matter to the attention of senior management. This includes an option to raise the matter through a confidential whistle-blowing hotline and email contact address.

One of our continuing policy development goals is to increase awareness of, and engagement in, specific modern slavery and human trafficking issues and risks among our employees.

Vue International continues to encourage all of our employees to raise any concerns or queries they may have in relation to potential misconduct of any kind, and we continue to make our employees



aware of the specific role they have in preventing slavery and human trafficking, and helping us to implement our policies and processes in that regard.

Proposals currently under consideration include:

- rolling out a program of training sessions (either in person or online) in relation to modern slavery and human trafficking for all new and existing employees;
- including information in relation to our employees' role in relation to modern slavery and human trafficking in new starter induction training; and
- increasing the quality and visibility of the modern slavery and human trafficking information available on our group intranet site.

### Continuing development

We are constantly looking to enhance our policies (including modern slavery and human trafficking prevention policies and processes) to reflect the most recent standards of best practice. Our key goals for the 2021 financial year include:

- completing and formally adopting our revised procurement policy throughout the Vue International group, and starting the process of implementing that policy with a view to having it fully integrated in all territories by the end of November 2021;
- ensuring that our revised Vue International Procurement Policy is adequately sign-posted to potential suppliers in all of our procurement and tender documentation, as well as notified to existing Vue International suppliers;
- completing our risk assessment and diligence confirmation process in relation to existing Vue International suppliers;
- updating our Employee Handbook to include details of employees' specific rights and responsibilities in relation to the prevention of modern slavery and human trafficking;
- increasing employee engagement in, and awareness of, their role in preventing modern slavery and human trafficking within our business and supply chain; and
- ensuring that all new supplier agreements we enter into contain adequate provision in respect of supplier compliance with modern slavery and human trafficking law and regulation.

Approved for and on behalf of Vue International:

**J. Timothy Richards**  
CEO & Founder

**Alison Cornwell**  
CFO

**Steve Knibbs**  
COO



**Vue International group entities in the UK which are covered by this policy:**

Vue International Finco Limited  
Vue International Midco Limited  
Vue International Bidco PLC  
Vue Holdings (UK) Limited  
Vue Entertainment Holdings Limited  
Vue Entertainment Holdings (UK) Limited  
Vue Services Limited  
Vue Entertainment Limited  
A3 Cinema Limited  
Aurora Holdings Limited  
Aurora Cinema Limited  
Ster Century (UK) Limited  
Vue Theatres (UK) Limited  
Vue Properties Limited  
Treganna Bidco Limited  
Apollo Cinemas Limited  
Vue Cinemas Limited  
Vue Cinemas (UK) Limited  
Vue Booking Services Limited  
Shake UK Newco Limited  
Tulip UK Newco Limited