



Vista Group International Limited

# Modern Slavery Policy

Approved by resolution of the Board dated: 26 February 2024

## 1. Policy Statement

Vista Group International Limited (Vista Group) is committed to ethical and sustainable conduct in our operations and to working with suppliers to establish responsible business practices. This Policy should be read alongside Vista Group's Code of Ethics and other policies, frameworks and processes.

Vista Group is the parent company of a diversified group of companies that provide software and technology solutions across the global film industry. This Policy applies to Vista Group and all of its subsidiaries, including in New Zealand, the United States, Europe, Australia, Asia, the Republic of South Africa, and the United Kingdom.

This Modern Slavery Policy provides an overview of the approach Vista Group follows in identifying and addressing modern slavery risks in the operations and supply chains of Vista Group and its subsidiaries.

This Policy applies to all persons working for or on behalf of Vista Group or any of its subsidiaries, in any capacity, including employees, directors, officers, agency workers, contractors, and consultants.

## 2. Modern Slavery Obligations

Modern slavery describes situations of severe worker exploitation, including forced labour, trafficking in persons, debt bondage, servitude, deceptive recruiting, child labour, and severe exploitation of migrant workers.

Modern slavery legislation in the United Kingdom and Australia currently requires certain large organisations to disclose their risk management of forced labour in their operations and supply chains by publishing annual modern slavery statements.<sup>1</sup>

Vista Group is a reporting entity under Australia's *Modern Slavery Act 2018 (Cth)*.

Vista Group (NZ) Limited and Vista Entertainment Solutions (UK) Limited are subsidiaries of Vista Group that operate in the United Kingdom. Neither entity is currently required to publish a modern slavery statement in the United Kingdom but they have each elected to implement modern slavery risk management within their operations and publish a joint statement with Vista Group on a voluntary basis.

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<sup>1</sup> Australian Modern Slavery Act 2018 & UK Modern Slavery Act 2015.

### **3. Actions to identify and address Modern Slavery risks**

Vista Group and its subsidiaries are committed to ethical, responsible business conduct and to continuously improve policies and practices to combat modern slavery in all of its forms. Vista Group and its subsidiaries demonstrate this commitment by:

- prohibiting engagement in any form of modern slavery across their operations and supply chains;
- adhering to all applicable laws and regulations (whether that be the United Kingdom or Australian legislation) in the countries they operate in, including ensuring responsible labour standards, wages and employment conditions and recruitment practices;
- incorporating modern slavery risk into their governance and risk management processes, including by updating Vista Group's Code of Ethics (within our Corporate Governance Code), which contains the expectations for all directors, employees, contractors and advisers, to reflect specific management of modern slavery risk;
- identifying modern slavery risks in their operations, including contracted services;
- mapping their supply chains to understand key or priority areas of modern slavery risk and applying the risk assessment criteria, based on the Global Slavery Index 2018, to key suppliers;
- introducing a supplier onboarding questionnaire to ascertain suppliers' modern slavery risks in their operations and supply chains;
- engaging with key suppliers to better understand their supply chains and their potential modern slavery risks, including encouraging those suppliers to have human rights and modern slavery policies in place, including their own supply chain mapping, codes of conduct, and specialised training for employees;
- addressing and acting on any cases of identified or alleged instances of modern slavery in their operations and supply chains;
- introducing tailored specialised training to employees on how to identify risks of modern slavery and what to do if they have concerns that these activities are taking place;
- providing a non-discriminative work environment across our organisation that encourages employees to discuss human rights and modern slavery concerns in a confidential manner; and
- publishing modern slavery statements.

### **4. Reporting and remediation**

Vista Group and its subsidiaries take any allegations of modern slavery in their operations and supply chains seriously.

Vista Group is committed to addressing potential and actual risks of modern slavery across its operations and supply chain. Accordingly, Vista Group and its subsidiaries expect and

encourage employees and suppliers to report any concerns they may have regarding any actual or suspected occurrence or incident of modern slavery or unethical conduct.

Specifically, Vista Group's Whistleblower Policy offers an anonymous channel to report any unethical conduct, including any illegal acts and any modern slavery violations. All reports are treated confidentially and investigated.

If remediation is required involving a supplier relationship, Vista Group will work with the supplier to reinforce expected standards. If Vista Group or its subsidiaries identify that they have caused or contributed, either directly or indirectly, to any form of actual or suspected occurrence or incident of modern slavery, Vista Group commits to address and remediate the occurrence or incident as soon as possible.

## **5. Breach of Policy**

Any breach of this Policy will be taken seriously. Any employee who breaches this Policy will face disciplinary actions, which may result in dismissal for misconduct or gross misconduct.

Vista Group and its subsidiaries commit to considering termination of a supplier relationship where there are concerns regarding ongoing breaches or un-remedied behaviour by that supplier in relation to modern slavery.

## **6. Reviewing the Policy**

This Policy reflects the current practice of Vista Group and its subsidiaries.

Modern slavery compliance will be reviewed regularly by Vista Group's Board. Vista Group and its subsidiaries are committed to continuously improving the modern slavery compliance program and processes.

This Modern Slavery Policy was last updated on 26 February 2024.