



Modern Slavery Statement

1. Organisation

This statement applies to **Esdevium Games Limited** (the “**Company**”) which was acquired by Embracer Group AB on 8 March 2022. Embracer Group AB is a public registered company under the laws of Sweden. It is mainly active in the entertainment business as a video and board games developer, games and film publisher and distributor.

The information included in the statement refers to the financial year beginning 1 January 2022 and ending 31 March 2023, after the extending the financial year to align with the Embracer Group AB.

At Esdevium, we are passionate about our great games and the amazing stories they allow us to tell together. Using the narrative power of games, we aspire to create experiences that follow game players throughout their life, across all forms of media. We are committed to offering to every person the opportunity to live great stories and intense moments.

2. 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 which in turn became part of the Embracer Group AB in March 2022. In November 2022 the business and assets of the Company’s wholly owned subsidiary, Coiledspring Games Ltd, were transferred to the Company which now operates through two trading divisions of Asmodee United Kingdom and Coiledspring Games. The Asmodee Group is a leading international games publisher and distributor with operations located in Europe, North America, South America and Asia.

All our employees are based in the UK. In particular, we are based in the South East of England and our operations currently run from three sites in Alton and Bordon, Hampshire and one site in Hampton Hill, Richmond.

We distribute to retailers across a wide range of existing and newly released products every week from both third party publishers and games studios across the Asmodee Group. Demand for our product is steady throughout the year with seasonal peaks during March and April and October to December.

3. 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.



4. 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.

5. 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 Company 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/>



6. 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. Mandatory Code of Conduct training has included Workplace Harassment, Anti-Bribery and Corruption, Cyber-Security, Global Data Privacy and Financial Integrity. In line with the acquisition by Embracer Group AB of the Asmodee Group, additional training in 2022 was provided on Code of Conduct, Anti-Corruption, Corporate Governance, Information Policy, Insider Trading, Group Privacy and Trade Compliance Policies. Management Skills Training was provided throughout the year. All employees may raise a concern anonymously through our whistleblowing channel and we will aim to act as soon as possible after an incident is reported. Our policy is one of no retaliation against any person reporting concerns in good faith. As at the date of this statement, no incidents have been reported.

Our Supplier Code of Conduct reflects our commitment to acting with integrity in all our business relationships and our evolving systems and controls to ensure slavery and human trafficking is not taking place in our supply chains. It also sets out our expectation that all employees, suppliers and third-party partners will comply with ethics and anti-slavery practices.

A copy of the Code of Conduct, Supplier Code of Conduct and Trade Compliance policies can be found [here](#).

7. Plans for the future

Our priorities for 2023 are to continue to monitor and scrutinise our supply chains in relation to Modern Slavery and to continue to support the wellbeing and human rights of all our employees and the communities in which we operate. In order to help us achieve this aim, we will include guidance in our Supplier Handbook which is being reissued in the coming financial year for suppliers to report any concerns through our whistleblowing channels.

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:

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ALEX GREEN
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Print name:

Alex Green

Job Title:

Managing Director

Date of approval:

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