



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 its business or supply chain;
- prevent any instances of modern slavery or human trafficking occurring within its own business; and
- ensure that every supplier with whom Vue International does 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 terms “Vue International” and the “Group” refer, respectively, to Vue International Holdings Limited and all of its subsidiaries.

Our business, structure and supply chains

Vue International is one of the world's leading cinema operators, managing a number of the most respected brands in major European markets, spanning eight countries, 224 sites and 1,962 screens. The Group has leading positions in the United Kingdom, Ireland, Germany, Denmark, Netherlands, Italy, Poland, and Lithuania.

Each of the Group's brands is operated as a separate business unit, with local management in each jurisdiction reporting to the Group head office located in London.

The Group's suppliers include film and other screen content distributors, as well as manufacturers, wholesalers and distributors of food, beverages, merchandise, uniforms, technical equipment and providers of cleaning and facilities management services, property maintenance and construction services and other professional services.

Group policy statement

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

Supplier diligence

Before entering into a relationship with any new supplier, Vue International assesses the modern slavery risks associated with that supplier, the goods or services with respect to which Vue International is proposing to contract with that supplier, and the geographical areas in which that supplier operates. The outcome of this initial analysis determines the level of due diligence which Vue International conducts with respect to that supplier and in relation to those goods or services. In all cases, Vue International will take all reasonable steps:



- to confirm that no instance of modern slavery or human trafficking has occurred (or is occurring) within that supplier's business;
- to confirm the steps that the supplier has taken to ensure that no modern slavery or human trafficking has occurred (or is occurring) within their own business or supply chain; and
- to obtain such further information or evidence from that supplier or other sources as the Group may deem necessary or appropriate regarding that supplier's policies and processes in relation to modern slavery or human trafficking.

Vue International's approach to supplier diligence is informed by the Group's zero-tolerance approach to modern slavery and human trafficking. If the Group is not able to satisfy itself as to the modern slavery and human trafficking policies or procedures of a potential supplier or the modern slavery risks associated with that supplier and its operations, the Group will not conduct any business with that supplier.

While Vue International places significant emphasis on diligence at the point of potential engagement, it also keeps itself apprised of its supply chains as required. Were the Group to discover any evidence, or have cause for suspicion, that any instance of modern slavery or human trafficking had occurred with any of its suppliers, the Group would immediately cease to do business with that supplier pending a full investigation and if appropriate would report the matter to the relevant legal authorities.

Additionally, the Group will always seek to ensure that any supplier 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.

Supply chain risk analysis

Generally, Vue International considers the risk of modern slavery or human trafficking occurring within its or its businesses' supply chain to be low. The principal reasons for this are that:

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

If the Group identifies 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 procurement process. Characteristics indicating a need for such enhanced scrutiny may include:

- the operation of manufacturing or processing facilities by a supplier in countries with less developed protections against worker exploitation, or with higher levels of estimated modern slavery (as determined by the Global Slavery Index 2023); 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.

The Group also recognises the fact that over the last few years, global supply chains have continued to feel the strain of economic and political instability, international conflict, inflationary pressures and



rising raw material prices. These factors put suppliers under pressure which, in turn, increases the risk of modern slavery and human trafficking. The Group takes account of that increased risk during its analysis of the materials provided by potential suppliers as part of the diligence process.

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, Vue International acknowledges that the Group has a continuing obligation to ensure that its relevant policies and strategies remain fit for purpose as the scale of its business and operations develop over time.

Employee awareness and training

Vue International has adopted a Whistle-Blowing Policy, details of which are available to all employees. This Policy promotes accountability and encourages employees to report concerns about any potential issue affecting the Group, including actual or suspected occurrences of modern slavery or human trafficking. The Policy sets out how employees can raise their concerns, including through the confidential whistle-blowing hotline.

The Group's Code of Conduct encourages all employees to raise any concerns or queries they may have in relation to potential misconduct of any kind. The Group continues to consider further ways in which it can increase its employees' awareness of the specific role they have in preventing slavery and human trafficking, and in helping the Group and its individual businesses to implement policies and processes in that regard.

Continuing development

The Group and its businesses strive to improve and update their policies to reflect the most recent standards of best practice including the policies and processes intended to reduce the risk of modern slavery and human trafficking.

Vue International's key initiatives include the following:

- standardising the supplier due diligence criteria and process record keeping across all businesses and functions within the Group;
- implementing a recurring programme of training and awareness in relation to modern slavery and human trafficking; and
- increasing the quality and visibility of the modern slavery and human trafficking information available on the intranet sites for the Group's businesses.



Approved for and on behalf of Vue International by:

A handwritten signature in black ink, appearing to read "J. Richards".

J. Timothy Richards
CEO & Founder

A handwritten signature in black ink, appearing to read "Alison Cornwell".

Alison Cornwell
CFO

A handwritten signature in black ink, appearing to read "Matt Eyre".

Matt Eyre
COO



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

Vue Holdings (UK) Limited
Vue Entertainment Investment Limited
Vue Entertainment Holdings Limited
Vue Entertainment Holdings (UK) Limited
Vue Entertainment Limited
Vue Services Limited
A3 Cinema Limited
Aurora Holdings Limited
Aurora Cinema Limited
Ster Century (UK) Limited
Vue Cinemas Limited
Vue Cinemas (UK) Limited
Treganna Bidco Limited
Apollo Cinemas Limited
Shake UK Newco Limited
Tulip UK Newco Limited
Vue Properties Limited
Vue Entertainment International Limited