

Vista Group International Limited

Modern Slavery Policy



Approved by resolution of the Board dated: 24 November 2021

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 subsidiary entities, including in New Zealand, the United States, Europe, Australia, Asia, 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 Vista Group's operations and supply chains.

This Policy applies to all persons working for or on behalf of Vista Group, 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 UK 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.¹ Vista Group is not currently required to publish a modern slavery statement but has elected to implement modern slavery risk management within its operations on a voluntary basis.

3. Actions to identify and address Modern Slavery risks

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

- prohibiting engagement in any form of modern slavery across our operations and supply chains;
- adhering to all applicable laws and regulations (whether that be the UK or Australian legislation) in the countries we operate in, including ensuring responsible labour standards, wages and employment conditions and recruitment practices;
- incorporating modern slavery risk into our governance and risk management processes, including by updating our Code of Ethics (within our Corporate Governance Code), which

¹ Australian Modern Slavery Act 2018 & UK Modern Slavery Act 2015.

contains our expectations for our directors, employees, contractors and advisers, to reflect specific management of modern slavery risk;

- identifying modern slavery risks in our own operations, including contracted services;
- mapping our supply chain to understand key or priority areas of modern slavery risk and applying our risk assessment criteria, based on the [Global Slavery Index 2018](#) to key suppliers;
- introducing a supplier onboarding questionnaire to ascertain our suppliers' modern slavery risks in their own operations and supply chains;
- engaging with key suppliers to better understand their supply chains and their potential modern slavery risks, including encouraging our 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 our operations and supply chains;
- introducing tailored specialised training to our 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 our employees to discuss human rights and modern slavery concerns in a confidential manner; and
- publishing voluntary modern slavery statements.

4. Reporting and remediation

Vista Group takes any allegations of modern slavery in its operations and supply chains seriously.

We are committed to addressing potential and actual risks of modern slavery across our organisation and supply chain. Accordingly, Vista Group expects and encourages its 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 are fully investigated.

If remediation is required involving a supplier relationship, Vista Group will work with the supplier to reinforce our standards. If Vista Group identifies that it has caused or contributed, either directly or indirectly, to any form of actual or suspected occurrence or incident of modern slavery, we commit 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.

We commit to considering termination of a supplier relationship where we are concerned by ongoing breaches or un-remedied behaviour in relation to modern slavery.

6. Reviewing the Policy

This Policy reflects Vista Group's current practice.

Vista Group's modern slavery compliance will be reviewed regularly by the Board, to ensure it continues to reflect Vista Group's modern slavery compliance practices. We are committed to continuously improving our modern slavery compliance program and processes.

This Modern Slavery Policy was last updated on 24 November 2021.