

# Vista Group International Limited

## Modern Slavery and Human Trafficking Statement (2021)

### 1. Introduction

Nga mea pai me nga – doing good things with good people – is at the heart of what Vista Group International Limited (Vista Group) and its subsidiaries do. Consistent with this goal, Vista Group and its subsidiaries are committed to ethical and sustainable conduct, including taking reasonable steps to identify and address the risk of slavery and human trafficking in their respective operations and supply chains.

### 2. Purpose

This voluntary statement sets out the steps that Vista Group and its subsidiaries have taken during the financial year ending 31 December 2021 (FY21) and will take during the financial year ending 31 December 2022 (FY22) to identify potential modern slavery and human trafficking risks related to their businesses and in their supply chains, and to mitigate such risks.

### 3. What we do

Vista Group is a diversified group of companies that provide software and technology solutions that span the value chain of the global film industry, from production and distribution to cinema exhibition and the moviegoer. Vista Group includes:

- Vista Cinema (cinema management software for enterprise cinemas) – [www.vista.co](http://www.vista.co)
- Veezi (cloud-based cinema management software for independent cinemas) – [www.veezi.com](http://www.veezi.com)
- Movio (data analytics and campaign management software for cinemas) – [www.movio.co](http://www.movio.co)
- Maccs (film distribution software) – [www.maccs.com](http://www.maccs.com)
- Numero (box office reporting for film distributors and cinemas) – [www.numero.co](http://www.numero.co)
- Powster (creative studio platform) – [www.powster.com](http://www.powster.com); and
- Flicks (a moviegoer facing website and application that provides information about what content to see and where to see it) – [www.flicks.co.nz](http://www.flicks.co.nz) / [www.flicks.com.au](http://www.flicks.com.au) / [www.flicks.co.uk](http://www.flicks.co.uk).

### 4. Structure

Vista Group (the parent company of the Vista Group group of companies) is incorporated in New Zealand and is listed on the New Zealand and Australian stock exchanges under ticker code “VGL”. Vista Group:

- Is the controlling shareholder in companies operating in New Zealand, Australia, US, United Kingdom, the Netherlands, South Africa, Malaysia and Romania
- Has other shareholdings in entities operating in US, Mexico, Brazil and China (minority shareholding)
- Employs over 700 staff across its subsidiaries

### 5. Supply chain

Vista Group’s main supplier categories include technology related goods and services, professional services, property, facilities and facilities-related services, and office consumables.

Vista Group has not during the course of carrying out its FY21 modern slavery risk assessment and work programme identified or been informed of any allegations of human trafficking / slavery activities

against suppliers to Vista Group and its subsidiaries, but Vista Group commits to conducting ongoing due diligence to identify key risk areas (including cleaning and services contractors at Vista Group's key offices, and IT equipment and office supplies) to ensure appropriate action can be taken to prevent such activities occurring in Vista Group's supply chains. (See Next Steps below.)

## 6. Policies and Governance

**Code of Ethics:** Vista Group has a Code of Ethics which plays a key role in establishing the framework by which Vista Group's Directors and employees are expected to conduct themselves. The Code of Ethics sets out guiding principles to facilitate decisions that are consistent with Vista Group's values, business goals and legal and policy obligations. Directors and employees are required to familiarise themselves with Vista Group's Code of Ethics, as it governs their behaviour while they are engaged or employed by Vista Group or its subsidiaries.

**Modern Slavery Policy:** Vista Group has adopted a Modern Slavery Policy which provides an overview of the approach Vista Group follows in identifying and addressing modern slavery risks in the operations and supply chain of Vista Group and its subsidiaries. The policy applies to all persons working for or on behalf of Vista Group and its subsidiaries and is available [here](#).

**Recruitment:** Conducting "right to work" checks, to ensure all staff are eligible to work in the country in which their role is located, and to safeguard against individuals being forced to work against their will, is a standard and embedded part of the recruitment processes of Vista Group and its subsidiaries.

## 7. Actions and progress during FY21

During FY21 Vista Group conducted the following exercises as part of its modern slavery risk assessment and work programme:

- **Awareness:** Vista Group's Board and senior management are well aware of our modern slavery obligations and we have increased employee awareness across the businesses.
- **Supplier mapping:** We identified and recorded Vista Group International Limited and Vista Entertainment Solutions (UK) Limited Tier 1 Suppliers, including name, location, category of product / service supplied, and whether those suppliers have published a modern slavery statement.
- **Risk assessment:** We developed risk assessment criteria for identifying whether Tier 1 suppliers present a high, medium or low risk of exposure to modern slavery in their supply chain. Vista Group's risk assessment criteria are based on the Global Slavery Index 2018 and take into account: (a) countries with a high prevalence of modern slavery; and (b) products and services at high risk of being produced or supplied by forced labour, as reported therein.
- **Modern Slavery Policy:** We developed and rolled out a Modern Slavery Policy, outlining how Vista Group seeks to identify and minimise modern slavery risks in its operations.
- **Supplier onboarding Modern Slavery Questionnaire:** We prepared a Modern Slavery Act questionnaire for all new suppliers, to share our expectations with suppliers to increasingly manage the risks of modern slavery. We will roll out the questionnaire to all new suppliers and key **existing** suppliers in the next phase of our work programme.
- **Training:** We developed modern slavery awareness training for all staff involved in sourcing products / services on behalf of Vista Group, to raise awareness of potential modern slavery risks related to Vista Group's business and supply chains and how to report such risks. We will roll out this training to all employees engaged in procuring products and services for Vista Group in the next phase of our work programme.
- **Corporate Governance Code:** We updated the Vista Group Corporate Governance Code to reflect Vista Group's Modern Slavery Policy.

## 8. Next steps

During the FY22 Vista Group will focus on:

- Further enhancing its supplier risk management programme, including:

- Expanding our supply chain map.
  - Applying our risk assessment criteria to all mapped suppliers.
  - Rolling out our supplier modern slavery onboarding questionnaire to all new suppliers and key existing suppliers to assess the suppliers' reputation and respect of the law.
  - Developing a Supplier Code of Conduct to set out minimum standards we expect of our suppliers.
  - Developing a system and policy for managing Vista Group suppliers found to have a medium or high risk of modern slavery in their supply chain.
- Rolling out modern slavery awareness training to all employees of Vista Group and its subsidiaries that are engaged in procurement activities.
  - Developing OKRs to monitor, measure and improve the effectiveness of our actions.

## 9. Consultation and Approval

Vista Group and its subsidiaries are not currently required to publish a modern slavery statement but have elected to implement modern slavery risk management within their operations and publish this statement on a voluntary basis.

This is a joint statement of Vista Group International Limited (NZ company number 1353402) and Vista Entertainment Solutions (UK) Limited (UK company number 06028720).

This joint statement covers the period from 1 January 2021 – 31 December 2021. It was circulated to the Vista Group Audit and Risk Committee for review on behalf of Vista Group International Limited and Vista Entertainment Solution (UK) Limited, prior to being approved by the Board on 25 January 2022.



**James Ogden**

Independent Director and Chair of the Audit and Risk Committee  
**Vista Group International Limited**