

# MODERN SLAVERY STATEMENT

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## A) ORGANISATION

This statement applies to Embracer Group AB, a public company registered and operated under the laws of Sweden (referred to in this statement as **“Embracer”** or **“Parent Company”**), PLAION GmbH, a company registered and operated under the laws of Austria, and the following companies registered and operating under the laws of the United Kingdom (referred to in this statement as **“UK Entities”**):

- Plaion Ltd. (**“PLAION UK”**);
- Deep Silver Dambuster Studio Ltd (**“Deep Silver UK”**);
- Free Radical Design Ltd. (**“Free Radical”**);
- Splatter Connect Ltd. (**“Splatter”**);
- Atlantis Games Ltd. (**“Atlantis”**);
- Flying Wild Hog Development Ltd. (**“FWH”**); and
- Voxler Ltd. (**“Voxler”**).

PLAION GmbH and the UK Entities together also referred to in this statement as **“PLAION”**. The information included in the statement refers to the financial year 2021/2022 ended on March 31st, 2022.

## B) ORGANISATIONAL STRUCTURE

Embracer 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 movie publisher and distributor. Through its affiliates, including, the PLAION, THQ Nordic GmbH, Saber Interactive, Gearbox, Coffee Stain, Easybrain, Deca Games, Asmodee, Eidos, Crystal Dynamics and many others, it is active in several EU member states and worldwide with companies in Austria, Germany, France, Spain, UK, BeNeLux, Sweden, USA, Hong Kong, Japan, Australia etc..

Founded in 2011, Embracer is a group of businesses led by entrepreneurs in PC, console, mobile and board games and other related media. Embracer has an extensive catalog of over 850 owned or controlled franchises, including Deep Silver, Prime Matter, Saints Row, Dead Island, Let's Sing, Borderlands, World War: Z, Goat Simulator, Darksiders, MX vs. ATV, Red Faction, Titan Quest, Biomutant, Wreckfest and many more.

In 2017 Embracer acquired 100% of PLAION GmbH (formerly known as Koch Media GmbH) with its head office in Höfen / Austria, and with subsidiaries and branches in Germany, UK, Spain, Italy, the USA, BeNeLux, Hong Kong, Japan, Australia and others. PLAION maintains strategic collaborative partnerships with numerous game developers: Blizzard Activision, Bethesda, Capcom, Koei Tecmo, Konami, Sega, Square Enix and many others.

PLAION's publishing labels Deep Silver, Prime Matter, Ravenscourt, Milestone and Vertigo have released more than 200 games, including independent brands such as Saints Row and Metro. PLAION owns, amongst others, Fishlabs, Deep Silver Dambuster Studios, Deep Silver Volition, Voxler and Vertigo development studios.

The labour supplied to PLAION in pursuance of its operation is carried out in all countries where it has its offices, e.g. across all Europe, the USA and Asia.

In the UK, PLAION is carrying out its business through its UK Entities, all 100% subsidiaries of PLAION GmbH.

**PLAION UK** is located at 2nd Floor, Building 1230 Waterside, Arlington Business Park, Theale, Reading, RG7 4SA, UK.

Deep Silver, the global games publishing entity is part of this company.

**Deep Silver Dambuster Studio** is located at 122 Canal Street, Nottingham, NG1 7HG, UK.

**Free Radical** is located at Wollaton Street, Suite 201, The Atrium, Nottingham, NG1 5FW, UK.

**Splatter** is located at Advantage Business Centre, 132-134 Great Ancoats Street, Manchester, M4 6DE, UK

**Atlantis** is located at 2nd Floor, Building 1410, Arlington Business Park, RG7 4SA Theale, Reading, RG7 4SA, UK

**FWH** is located at 122 Canal Street, Nottingham, NG1 7HG, UK

**Voxler** is located at PO Box OFFICE G07, 14-16 Dowgate Hill, London, EC4R 2SU, UK

The main activity carried out by PLAION is the development, publishing and physical and digital distribution of entertainment software (video games), movies and board games. PLAION's business divisions in the gaming sector include game development, publishing and distribution under the labels Embracer, Deep Silver, Ravenscourt, Milestone and Vertigo, as well as partner publishing and distribution.

### **C) DEFINITIONS**

The Group 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.

### **D) COMMITMENT**

PLAION acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

PLAION does 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 PLAION in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the European Union, the respective country, and in many cases exceeds those minimums in relation to its employees.

### **E) SUPPLY CHAINS**

Since PLAION is a video game publisher and developer the most important assets are intellectual properties either developed by the Group itself or by its partners.

For certain products, for example physical games, merchandising or consoles, PLAION's supply chain include 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. PLAION 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.

PLAION has not to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

## **F) POTENTIAL EXPOSURE**

PLAION considers its main exposure to the risk of slavery and human trafficking to exist in the field of software development. For many young and talented developers working in the entertainment and games industry is a dream and their passion. The downside is that to be able to work in the entertainment industry developers are willing to sacrifice their interests, for example work life balance and wage.

However, compared to other industries (e.g. clothing supply) in which labour do not need to have an certain education level, skill or knowledge, software developers are not facing the risk of being exploited in a way relevant for the Modern Slavery Act and have their human rights violated.

In general, PLAION considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## **G) STEPS**

PLAION carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

PLAION has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, PLAION has taken the following steps to ensure that modern slavery is not taking place:

- Committing business partners to existing law;
- Internal accountability standards and procedures for employees and contractors and take action on those who fail to meet company standards regarding slavery and trafficking
- Company employees and managers with direct responsibility for supply chain management training on human trafficking and slavery, particularly with respect to mitigating risks.

## **H) POLICIES**

PLAION has the following policies which further define its stance on modern slavery

- Embracer Code of Conduct

## **I) TRAINING**

PLAION provides the following training to staff to effectively implement its stance on modern slavery

PLAION is holding workshops in which we train employees and raise the awareness for compliance and sustainability, which includes modern slavery/human trafficking. The workshop covers:

- Code of Conduct training
- Laws which apply
- Commitment to law
- Internal policies
- Raise awareness of every employee for risks in his business field and daily work

## **J) ANTI-SLAVERY COMPLIANCE OFFICER**

PLAION has an Anti-Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

- **Signature page to follow** -

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Date of approval.....

*Ian Gulam*

Signed.....

Ian Gulam, Chief of Staff, Legal & Governance  
Embracer

Date of approval.....

*Kundratitz*

Signed.....

Dr. Klemens Kundratitz, CEO  
PLAION GmbH

Date of approval.....

*Kundratitz*

Signed.....

Dr. Klemens Kundratitz, Director  
Deep Silver Dambuster Studios Ltd.

Date of approval.....

*McNicol*

Signed.....

Craig McNicol, Director  
PLAION Ltd.

Date of approval.....

*Kundratitz*

Signed.....

Dr. Klemens Kundratitz, Director  
Free Radical Design Ltd.

Date of approval.....

*Kundratitz*

Signed.....

Dr. Klemens Kundratitz, Director  
Splatter Connect Ltd.

Date of approval.....

*Thomas Merk*

Signed.....

Thomas Merk, Director  
Flying Wild Hog Development Ltd.

Date of approval.....

*Thomas Merk*

Signed.....

Thomas Merk, Director  
Atlantis Games Ltd.

Date of approval.....

*Nicholas Delorme*

Signed.....

Nicolas Delorme  
Voxler Ltd.