



## Modern slavery and human trafficking statement

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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 our business or supply chain;
- prevent any instances of modern slavery or human trafficking occurring within our own business; and
- ensure that every supplier with whom we do 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 term “Vue International” refers to Vue International Holdco Limited and all of its subsidiaries.

### Our business, structure and supply chain

Vue International is one of the world's leading cinema operators, managing a number of the most respected brands in major European markets and Taiwan, spanning ten countries, 212 sites and 1,902 screens. The group has leading positions in the United Kingdom, Ireland, Germany, Denmark, Netherlands, Italy, Poland, Latvia, Lithuania and Taiwan.

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

Our suppliers and contractors include providers of food, drinks, uniforms, technical equipment, cleaning and facilities management services, property maintenance and construction services and other professional service providers (such as architects, lawyers, accountants and auditors).

### Group policy statement

Vue International does not and will not tolerate modern slavery or human trafficking in any aspect of our 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

In the financial year ending 30 November 2017 Vue International adopted a revised group procurement policy, which is being rolled out across the group’s operating territories in the 2018 financial year. The policy requires that, before being engaged to provide any goods or services to any part of our business, any potential supplier must provide us with (among other things):



- confirmation that no instance of modern slavery or human trafficking has occurred (or is occurring) within their business;
- information about the steps they have taken to ensure that no modern slavery or human trafficking has occurred (or is occurring) within their own supply chain; and
- such further information or evidence as we may reasonably request in relation to that potential supplier's policies and processes in relation to modern slavery or human trafficking.

The information provided will be assessed by our Head of Group Procurement (in the case of group-wide supplier arrangements) or the local Head of Procurement or Head of Retail (in the case of territory-specific supplier arrangements), who will form a view as to whether the potential supplier has appropriate and robust modern slavery and human trafficking policies and procedures in place. Where necessary, we will request further evidence or information or will arrange for site visits to inspect the manufacturing facilities of individual suppliers.

In the event that we are not able to satisfy ourselves as to the modern slavery and human trafficking policies or procedures of a potential supplier, we will not conduct any business with that supplier. Were we to discover any evidence, or have cause for suspicion, that any instance of modern slavery or human trafficking has occurred with any of our existing suppliers, we would report this to the appropriate legal authorities.

Where any member of the Vue International group enters into a contract with any supplier for the provision of goods and services, we will always seek to ensure that such 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, we consider the risk of modern slavery or human trafficking occurring within our supply chain to be low. The principal reasons for this are that:

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

If however we identify 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 Vue International procurement process. Characteristics indicating a need for such enhanced scrutiny may include:



- the smaller scale of the supplier's business meaning that their internal policies and processes in relation to modern slavery and human trafficking are less well developed;
- the operation of manufacturing or processing facilities by a supplier in countries with higher levels of estimated modern slavery (as determined by the Global Slavery Index 2016); 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.

### **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, we acknowledge that we have a continuing obligation to ensure that our relevant policies and strategies remain fit for purpose as the scale of our business and operations develops over time.

### **Staff awareness and training**

Vue International has adopted a whistle-blowing policy, details of which are available to all members of staff. This policy details how any member of staff with concerns about a potential issue (including potential occurrences of modern slavery or human trafficking) should bring the matter to the attention of senior management. This includes an option to raise the matter through a confidential whistle-blowing hotline and email contact address.

One of our policy development goals for the 2018 financial year is to increase awareness of, and engagement in, specific modern slavery and human trafficking issues and risks among our employees.

Whilst we encourage all of our employees to raise any concerns or queries they may have in relation to potential misconduct of any kind, we accept that we could always do more to make our employees aware of the specific role they have in preventing slavery and human trafficking, and helping us to implement our policies and processes in that regard.

Proposals currently under consideration include:

- rolling out a program of training sessions (either in person or online) in relation to modern slavery and human trafficking for all new and existing employees;
- including information in relation to our employees' role in relation to modern slavery and human trafficking in new starter induction training; and
- increasing the quality and visibility of the modern slavery and human trafficking information available on our group intranet site.



### Continuing development

We are constantly looking to update our policies (including modern slavery and human trafficking prevention policies and processes) to reflect the most recent standards of best practice. Our key goals for the 2018 financial year include:

- embedding our revised group procurement policy throughout the Vue International group and ensuring consistent implementation of this policy in all jurisdictions and business areas;
- updating our employee handbook to include details of employees' specific rights and responsibilities in relation to the prevention of modern slavery and human trafficking;
- increasing employee engagement in, and awareness of, their role in preventing modern slavery and human trafficking within our business and supply chain; and
- ensuring that all new supplier agreements we enter into contain adequate provision in respect of supplier compliance with modern slavery and human trafficking law and regulation.

Approved for and on behalf of Vue International:

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