

# MODERN ANTI-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 the “Parent Company”), Koch Media GmbH, a company registered and operated under the laws of Austria (referred to in this statement as “Koch Group”), Koch Media Ltd., a company registered and operated under the laws of the United Kingdom (referred to in this statement as “Koch UK”) , and Deep Silver Dambuster Studio Ltd, a company registered and operated under the laws of the United Kingdom (referred to in this statement as “Deep Silver UK”). All together are referred to in this statement as the “Group”.The information included in the statement refers to the financial year 2020.

## 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 games developer, games and movie publisher and distributor. Through its affiliates, including, the Koch Media Group, THQ Nordic GmbH, Saber Interactive, Deca Games and many others, it is active in several EU member states and worldwide with companies in Sweden, Austria, Germany, France, Spain, UK, BeNeLux, Sweden, USA, Hong Kong, Japan, Australia etc.

Founded in 2011, Embracer is a global video game publisher and developer. Embracer brands include 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 the Koch Group with its head office in Austria and with subsidiaries and branches in Germany, UK, Spain, Italy, the USA, BeNeLux, Hong Kong, Japan, Australia and others. The Koch Group maintains strategic collaborative partnerships with numerous game developers: Blizzard Activision, Bethesda, Capcom, Koei Tecmo, Konami, Sega, Square Enix and many others.

Koch Media’s publishing labels Deep Silver and Prime Matter has released more than 200 games, including independent brands such as Saints Row and Metro. Deep Silver owns, amongst others, the Deep Silver Fishlabs, Deep Silver Dambuster Studios, Deep Silver Volition, Voxler and Vertigo development studios.

The labour supplied to the Group 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 UK, Embracer is carrying out its business through the subsidiaries Koch UK and Deep Silver UK, both 100% subsidiaries of the Koch Group.

Koch UK’s office is Koch Media Ltd. 2nd Floor, Building 1230 Waterside, Arlington Business Park Theale, Reading, UK.

The Deep Silver UK office is Deep Silver Dambuster Studios 122 Canal Street Nottingham NG1 7HG, UK.

The main activity carried out by Embracer is the physical and digital distribution, publishing and development of entertainment software (video games) and movies. Its business divisions in the gaming sector include game development and self-publishing under the labels Embracer, Deep Silver and Ravenscourt, 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 or 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**

The Group 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.

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

## **F) POTENTIAL EXPOSURE**

The Group 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 own 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 a 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, the Group 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**

The Group 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.

The Group 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, the Group 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**

The Group has the following policies which further define its stance on modern slavery:

- Embracer Compliance Guide and Code of Conduct

## **I) TRAINING**

The Group provides the following training to staff to effectively implement its stance on modern slavery:

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

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

## **J) SLAVERY COMPLIANCE OFFICER**

The Group has a 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:** September 1<sup>st</sup>, 2021

Signed..... *Lars Wingefors* .....

**Lars Wingefors, Group CEO**

**Date of approval:** September 1<sup>st</sup>, 2021

Signed..... *Klemens Kundratitz* .....

**Dr. Klemens Kundratitz,  
CEO Koch Group**

**Date of approval:** September 1<sup>st</sup>, 2021

Signed..... *Klemens Kundratitz* .....

**Dr. Klemens Kundratitz, Director  
DeepSilver Dambuster Studios Ltd.**

**Date of approval:** September 1<sup>st</sup>, 2021

Signed..... *Craig McNicol* .....

**Craig McNicol, Director  
Koch Media Ltd.**