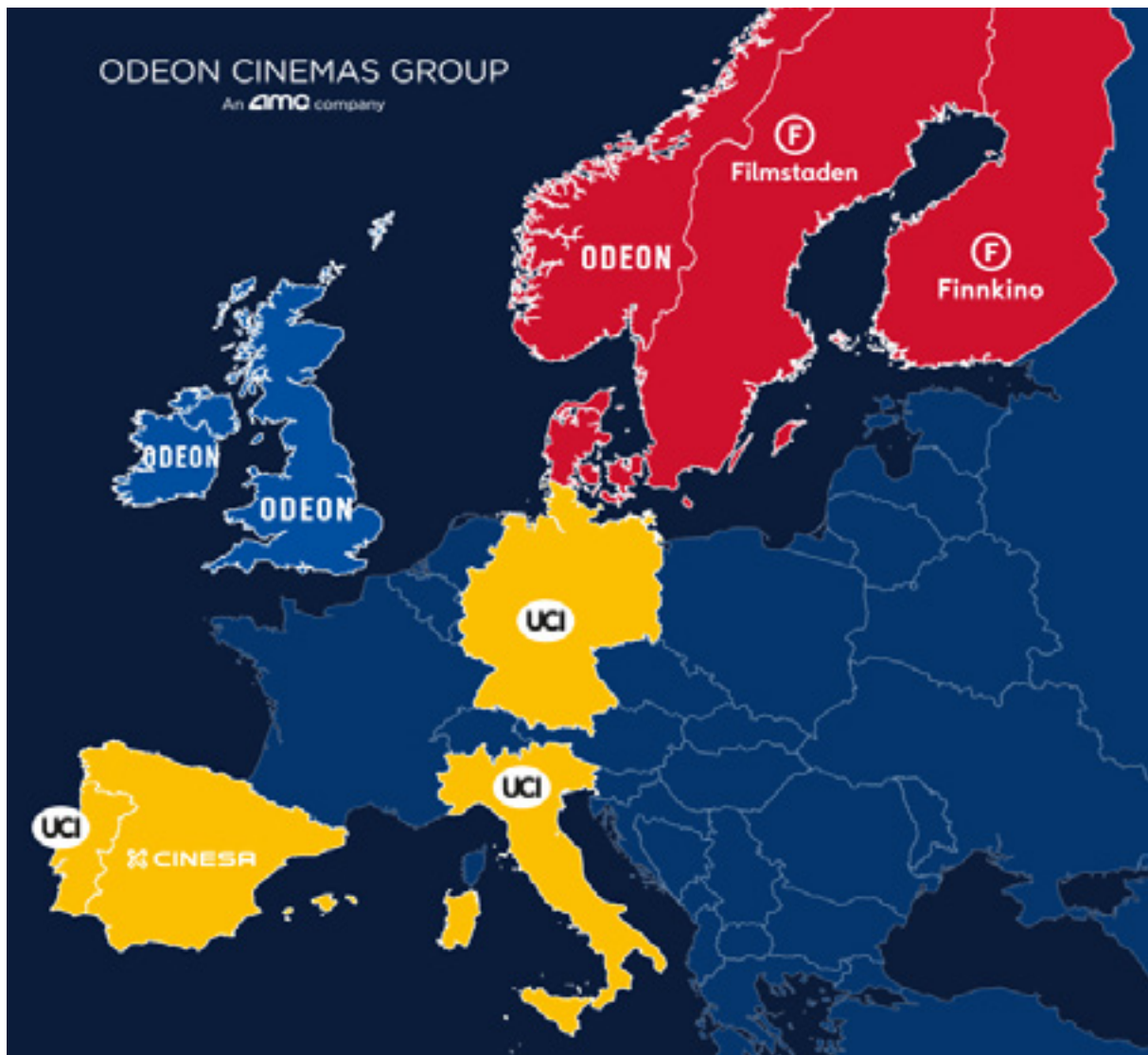


# MODERN SLAVERY POLICY 2026

HUMAN RIGHTS & MODERN SLAVERY

ODEON CINEMAS GROUP

An **amc** company



## **ODEON CINEMAS GROUP MODERN SLAVERY POLICY 2026**

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## 01 Introduction



People are at the heart of everything we do at ODEON Cinemas Group – whether that is our colleagues, guests, partners, suppliers, and any others we may meet or do business with. Therefore, this modern slavery policy reflects our values of trust & respect and co-operation & accountability, and we take it very seriously.

At ODEON Cinemas Group, we understand our commitment as a responsible company to reduce the risks of modern slavery, and will address any allegation of human rights failures in our company and supply chain.

Modern slavery is a complex and global issue that continues to face additional challenges due to current factors, such as inflationary pressures, labour shortages, increased migration, climate change, and armed conflict.

We are focused on continuing to identify and prevent human rights violations and modern slavery and this policy outlines the actions we have taken during the last year, along with information on our commitment to reduce the risk and prevent slavery and human trafficking in our operations and supply chains.

Our focus and commitment in this area applies not only to the UK but extends to all the nine European countries where we operate. We remain committed to our programme of ongoing improvement and continue to review and adapt what we do to manage these risks effectively. We also pledge to continue working closely with our partners and new suppliers to ensure that fundamental human rights are always respected in our supply chain and across our business.

A handwritten signature in blue ink, consisting of a stylized 'M' followed by a long horizontal stroke.

Mark Way  
President AMC Europe & Managing Director ODEON Cinemas Group

This is the Modern Slavery policy and statement for Odeon Cinemas Group Limited, and its subsidiary companies in the UK (ODEON) made under section 54 of the UK Modern Slavery Act 2015. It sets out the approach taken and constitutes our Group Modern Slavery Policy for the year ending 31 December 2025.

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**ODEON's modern slavery statement:**

Modern Slavery is a crime and a violation of fundamental human rights, and we understand our responsibility in relation to this global issue. ODEON has a zero-tolerance approach to modern slavery.

We are committed to acting ethically, transparently and with integrity in all our business dealings and relationships. We also expect the same high standards from all our key suppliers, contractors, and other business partners; and we expect that our partners will hold their own suppliers to the same high standards.

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**This policy and statement is agreed on behalf of ODEON Cinemas Group by:**

Mark Way, President AMC Europe & Managing Director  
Juan Antonio Gomez, Chief Partnerships & Content Officer  
Chris Thomas, Group Chief Legal & Compliance Officer

## 02 Our Purpose

ODEON Cinemas Group is proud to be Europe's largest cinema operator, with leading brands in the UK, Ireland, Spain, Italy, Sweden, Finland, and a strong presence in Norway, Germany and Portugal. In Europe, we welcome millions of guests each year to enjoy great hospitality while watching the latest films and entertainment in around 280 cinemas and 2,500 screens.

Our brand purpose is to make movies better by developing world-class cinemas that deliver memorable entertainment experiences for our guests, whilst offering fantastic careers for our people.

We pride ourselves on delivering more immersive big screen experiences, with Luxe fully reclining seats offering optimum space and comfort; coupled with the very best in sight and sound innovation through our own iSense screens and our partnerships with IMAX and Dolby Cinema. We have evolved our experiences to be more seamless for guests, through investment in digital booking platforms and rewarding membership and subscription schemes. We believe that to make movies better you need a passionate and dedicated team to make the cinema experience more memorable for our guests, as well as a wide selection of quality food and beverage options to make the experience more delicious.

As an AMC company, ODEON Cinemas Group is part of the largest movie exhibition company in the world with around 910 theatres and around 9,900 screens across the globe.



### 03 Our Supply Chains

ODEON suppliers are essential to how we operate our business and to our success in making movies better for our guests and providing inspiring colleague experiences for our people.

We recognise and understand the value of stability in our supply base which is why we have many long-term relationships in place across our key categories.

We have a clear supplier strategy which supports our commitment to responsible sourcing and when selecting and introducing our new suppliers, we work hard to ensure that they are aligned with us, in our values and views on ethics and conduct.

ODEON procures products and services through an extensive and diverse supply chain. These include:

- Food & Beverage
- 3rd Party Logistics
- Packaging
- Waste Management
- Temporary Staff
- Facilities Management
- Communications and IT services
- Marketing
- Professional Services
- Utilities



**04 Our Governance and Policies**

# INCREDIBLE TOGETHER

Our group-wide corporate responsibility work is brought together under the umbrella of **'Incredible Together'**. Internally this programme is led by a group who focus on Environmental, Social and Governance updates to this business.

As a successful business, we take our responsibilities seriously and care about our people, our local communities, and our planet.

We have ongoing partnerships with several charities across our Group. This year marks the 10-year partnership with our UK charity partner, Mind, and last year, we raised a total in the sum of £120,500 through activities across our UK support offices and cinemas.

We manage our company for sustainable financial growth by applying the right ethics and governance – leading with our unique culture and values. We will be as inclusive as possible, connecting people and building a community spirit.

ODEON Cinemas Group's Executive team (ExCo) has overall responsibility for our Anti-Slavery and Human Trafficking policy.

The Group Legal & Compliance Officer and the Chief Partnerships & Content Officer have primary and day-to-day responsibility for our Anti-Slavery and Human Trafficking policy, monitoring its use and effectiveness, dealing with any queries, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.



OUR COMMUNITY



OUR PEOPLE



OUR PLANET

## Our Policies

ODEON has a suite of policies and documents, which demonstrate our commitment to standards, ethics, and business conduct. They are held on our 'Supplier Hub' and reflect how we work, what we value and what behaviours we expect from our colleagues, partners and suppliers.

Our reputation is one of our most valuable assets, and it depends on our honesty and integrity. We expect every colleague and supplier to be accountable for their actions. Our policies apply in, and our procurement activities take place in, all the countries where we operate.

We procure globally, and we expect our partners, and other companies we engage with, to ensure their goods, materials, services, and labour-related supply chains:

- Comply with the Modern Slavery act 2015, Directive 2014/95/EU, and any other relevant and applicable European, regional, or local legislation
- Are transparent, accountable, auditable, and free from ethical ambiguities

Our supplier agreements reflect our commitment to acting ethically and with

integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Our internal policies include:

- **Modern slavery:** Covers examples of modern slavery, how we include controls into our processes, the role colleagues play in preventing it, and what they need to do if they suspect modern slavery is taking place
- **Fraud, Anti-Bribery, and corruption:** Our approach to acting against those committing fraud, bribery, or other illegal or corrupt practices. Covers examples of potential types of fraud, bribery, and corruption, and encourages colleagues to be vigilant and report any suspicions of fraud, bribery, or corruption to management or via appropriate channels such as our Whistleblowing service.
- **Whistleblowing:** Covers the areas of concern that can be reported through our whistleblowing service, provides information on our commitment to investigate matters raised thoroughly, promptly, and confidentially and reminds colleagues of how they can raise concerns.



## 05 Risk Assessment & Due Diligence

Over the last 12 months we have continued to develop our processes and engage resources to better manage the risk of human trafficking and modern slavery.

### Assessing existing suppliers

We have completed an annual modern slavery risk assessment to identify the key services and suppliers that carry most risk to enable us to prioritise our activities.

Our process includes asking questions targeted at slavery and human trafficking risk to allow us to better understand how they manage transparency in their supply chains and how they comply with our requirements.

### Assessing new suppliers

For new key suppliers, wishing to collaborate with ODEON, we issue a Request for Proposal document and/or Pre-Qualification Questionnaire which include questions targeted at slavery and human trafficking risk. In this way we can identify risks and take appropriate action. Moreover, we expect our key suppliers to provide the relevant supportive evidence proving their statements.



We have in place methods and/or systems to:

- Identify and assess potential risk areas in our supply chains
- Monitor potential risk areas in our supply chains

We encourage anyone, including colleagues, suppliers, sub-contractors, and guests, to report in good faith any issue or concerns about potential unethical business practices, such as fraud, bribery or slavery and human trafficking.

## 06 Actions Taken

ODEON are pleased to have continued to make progress in how we review and improve our approach to tackling modern slavery.

We have continued to implement improvements through both supply chain initiatives and enhancements to systems and controls. We have also made changes to some of our internal ways of working to address the opportunities identified through our supply chain risk programme.

### Management responsibility and general awareness

We continue to engage with and report our progress to our ExCo. We have also communicated and raised awareness of this published statement with our key and targeted suppliers through our procurement processes and programme.

### Training

Having launched the OCG Human Trafficking and Modern Slavery Policy in 2024, we recorded a completion rate of 97.11% across the Group, meaning approximately 1853 colleagues have read and accepted the Policy. We will continue to refresh training on induction and identify opportunities for further training at regular intervals.

### Risk assessment

The modern slavery risk assessment is aligned and included in our overall business Supply Chain Risk Programme which considers both internal and external factors.

### **An assessment has been completed across our key suppliers in our supply chain over the last 12 months and the results have been shared with ExCo.**

- The assessment benchmarked our activities against statements and action plans undertaken by other companies; and considered any recent or emerging best practice.
- The results of the assessment have allowed us to identify our key focus categories on modern slavery and to then implement enhanced systems for targeting, monitoring, and managing risk across our key suppliers.
- The programme has also identified some opportunities to improve our internal ways of working, and we are currently reviewing and updating a number of these policies.



## 07 Looking Forward

### What we will deliver over the next 12 months

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#### Governance, Leadership, Policies and Training

- 1 Monitor progress across all areas in ODEON Cinemas Group
- 2 Monitor supply base performance in this area
- 3 Report on progress to the ExCo every 12 months
- 4 Update our published Supplier Code of Conduct to align to the latest requirements
- 5 Refresh Modern Slavery training on induction and identify opportunities for further training and regular intervals
- 6 Monitor and interpret any best practice in this area
- 7 Continue to benchmark against others in similar organisations
- 8 Identify opportunities for partnerships and collaborations in this area
- 9 Implementing deforestation-related ESG requirements will enhance supply chain mapping and supplier visibility. While driven by environmental compliance, this is expected to support human rights due diligence (by strengthening understanding of supply chain structure and risk exposure) and inform our approach to identifying and addressing modern slavery risks.

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#### Risk assessment and due diligence

- 1 Continue to implement Modern Slavery requirements on prospective new key suppliers via our procurement processes
- 2 Continue to increase the number of suppliers that we seek compliance confirmation from as part of our drive for continuous improvements
- 3 From these actions risk assess our suppliers and require them to act where needed
- 4 Continue to implement findings from our Supply Chain Risk Programme (including adapting our internal ways of working to address opportunities)

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We are confident about the next steps of our journey and proud of everything we have achieved so far.

We recognise that human rights is a fundamental principle which allows an individual to lead a dignified and independent life, free from abuse and violations, and we remain committed to identifying and addressing Modern Slavery risk in our business and across our supply chain. Over the next 12 months and in the years to come, we will continue to implement further improvements.