

# Modern Slavery Statement

## Introduction

Modern slavery is a crime and a violation of fundamental human rights. Allowing it to take place within an organisation, either consciously or through complacency, results in extensive and unnecessary suffering - often in a way that disproportionately affects groups of the most disadvantaged people.

We are committed to acting ethically to implement and enforce effective systems and controls to ensure modern slavery is not taking place within our operations or supply chains.

## Our organisational structure and business

We design, make and sell fantasy tabletop miniatures, games and associated hobby products (including books, paints, and other modelling accessories). We also licence our intellectual property (IP) to carefully selected partners to allow them to use our IP in connection with board games, merchandise and apparel, and media and entertainment.

We are a vertically integrated business, retaining control over every aspect of design, manufacture, and distribution of our miniatures and games.

The Games Workshop head office is located in Nottingham, UK, and includes the main design and manufacturing facilities. Distribution centres to support our global sales network are located in Castle Donington, Derby; Memphis, Tennessee; and Sydney, Australia.

Our products are sold through a chain of over 500 retail stores in the United Kingdom, the United States, Canada, Australia, New Zealand, Japan, China, Hong Kong, Malaysia, Singapore, France, Germany, Spain, Italy, the Netherlands, Eire, Belgium, Austria, Poland, Norway, Sweden, Denmark and Finland. Products are also sold by our trade partners, which consist of more than 6,000 other hobby, game and toy shops around the world. These outlets are complemented by our global webstore.

## Supply chain

In addition to our international workforce, we also rely on a network of global suppliers for the sourcing of raw materials and components for the manufacture of our products, the sourcing of supplementary products for resale, and the procurement of goods and services needed for day to day business operations. These tier one suppliers also have their own supply chain and like most businesses our visibility and ability to control or influence the policies, controls, and management processes becomes more challenging the further down the supply chain we go.

## **Anti-Slavery Policy**

All employees of Games Workshop are required to comply with our Anti-Slavery Policy at all times. Any breach of this Policy by a member of Staff may result in disciplinary action being taken, up to and including dismissal from Games Workshop.

The Anti-Slavery Policy also forms part of our Corporate Social Responsibility (CSR) requirements. These CSR requirements are detailed within our Supplier Manual, purchase agreements, and within our standard terms and conditions for the purchase of goods and services and cover both the activities of the supplier and the activities of their supply chain.

The key principles outlined in our anti-slavery policy are:

- that we undertake all business ethically and with integrity in accordance with all applicable laws and operate in full compliance with our obligations under all applicable anti-slavery legislation, including the Modern Slavery Act 2015.
- that we will not undertake business with any suppliers that do not agree to act in a manner consistent with our commitment against slavery.
- that we review our anti-slavery risk assessments and associated policies at least every 12 months and update them accordingly.

The Anti-Slavery Policy is communicated to all suppliers of (i) raw materials and components used for the manufacture of our products, and (ii) supplementary products for re-sale. These suppliers are required to comply with the Anti-Slavery Policy as part of our Corporate Social Responsibility (CSR) requirements.

Our licensing partners are also required to meet the compliance standards set out within the Anti-Slavery Policy. This may be achieved by requiring these partners to comply with our standard CSR requirements in the manner detailed above, or by reliance on the ethical codes and standards of those partners where equivalence can be demonstrated.

Any breach of the Anti-Slavery Policy or its compliance standards by a supplier or partner organisation shall result in appropriate action being taken against the supplier or partner organisation, up to and including immediate termination of any business relationship and reporting of the supplier or partner organisation to the relevant authorities.

## Risk management

Modern slavery risks are identified, assessed and managed as part of our company-wide risk management process. Risks are identified through a range of processes at all levels of the business and are recorded on our Anti-Slavery Risk Register. Each identified risk is assessed based on the likelihood of occurrence and the potential impact of that risk. The level of risk determines the level of due diligence that we undertake to help ensure our standards and expectations are being met with regards to the control and management of any risks of slavery occurring in our operations or supply chain.

The effective management of modern slavery risks forms an important part of our Social Responsibility and Sustainability (SRS) strategy. Responsibility for management of modern slavery risks - such as maintenance of our associated policies, training, and risk assessment activities - lies with our Head of Social Responsibility and Sustainability.

Ultimate accountability for modern slavery risks sits with our Board. These risks are reviewed at least twice a year via our Audit and Risk Board Committee.

Whilst we consider the overall risk of modern slavery to be low, we recognise the following areas of our business as being at elevated risk and so additional controls are implemented in order to manage this risk.

Business activity	Description of risks	Management process
Licensing	Our supply and distribution chain is global and when we engage with external companies, particularly those in diverse industries and high risk territories, our ability to control and influence how modern slavery risks are managed is reduced. This increases the likelihood of a situation where our business becomes associated with an organisation that does not conform to our high standards for ethical and responsible business practices.	Our staff that work in these areas receive mandatory refresher training on our policies regarding modern-slavery, responsible supply chains, and ethical sourcing. This includes tailored sessions that provide relevant examples for each business function and provides clear guidance on how to evaluate the business practices of potential partners and ensure they have robust anti-slavery and responsible business practices in place that are at least equivalent to our own.
Buying & Merchandising		
Distribution		
Recruitment of agency workers	The use of agency workers in our operations and facilities through a third party reduces our visibility for how these employees are treated by their employer. This increases the likelihood of a situation where our business becomes associated with activity that does not conform to our high standards for ethical and responsible business practices.	

## **Due Diligence Processes**

As part of our systems and controls to ensure modern slavery is not taking place within our operations or our supply chains, we undertake the following:

- Appropriate vetting and due diligence in respect of suppliers and licensees.
- Whenever possible, we maintain long standing relationships with suppliers, such relationships being based on good supplier performance and trusted compliance with Games Workshop's CSR requirements.
- Auditing and inspections of suppliers. All suppliers of products or product components are required to undergo independent third party ethical sourcing audits in order to become and remain a Games Workshop supplier. We have not found any evidence of slavery through these audits.
- Conducting risk assessments every year to identify those areas of the business that may be regarded as being at high risk of exposure to slavery, with such high risk areas being subject to additional safeguards.
- Reporting procedures for employees and suppliers which encourage the reporting of any incidents of potential, suspected, attempted or actual slavery.

## **Communication and Training**

We communicate our Anti-Slavery Policy to all employees, suppliers and licensing partners in the manner described in this statement. Employees that work in high risk areas are required to undertake annual training and pass an associated test to help them understand, identify, and manage any modern slavery risks that they may come across during their duties. This training is also made available to any members of staff that undertake project work in high risk regions or where their manager believes it to be necessary.

We will continue to review and update our policies and procedures as required to ensure that appropriate safeguards are maintained against modern slavery within our operations and our supply chains.

This statement is made on behalf of all companies within the Games Workshop group, including but not limited to, Games Workshop Group PLC, and Games Workshop Limited.

This statement is approved by the board of directors of the Games Workshop group on 15 October 2024, is made pursuant to section 54(1) of the Modern Slavery Act 2015, and constitutes our slavery and human trafficking statement for the financial year ending 2 June 2024.

Kevin Rountree

Chief Executive Officer

Games Workshop Group

15 October 2024