

Modern Slavery and Human Trafficking Statement 2023

beIN Media Group WLL (“**beIN**”) is a multi-national media company with operations in Pay-TV, Sport, Original Programming, Movies and General Entertainment in 43 countries across 5 continents and in 9 different languages spanning across Europe, North America, Asia, Australia and the Middle East & North Africa (“**MENA**”). We recognise that our activities, and those of third parties that form our supply chain, provide opportunities to positively impact our employees’ working and living environments and to set a standard as a responsible global employer.

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the “**Act**”) on behalf of beIN IP Limited, beIN Europe Limited and beIN IH Limited (the “**Companies**”). Our statement identifies the steps we have undertaken (in our most recent financial year) to identify and address the risk of modern slavery that may potentially result from our supply chains.

About us

beIN IP Limited is the central rights acquisition entity for the network of the beIN Sports channels worldwide. The company provides commercial, strategic and legal support in relation to the acquisition of sports media rights on behalf of beIN Media Group and its subsidiaries. beIN IH Limited is the international holding company of beIN Europe Limited and beIN IP Limited as well as other beIN subsidiaries in regions such as the U.S.

Our Commitment

beIN does not tolerate slavery or human trafficking and seeks to uphold the highest ethical standards in its business.

beIN is against all forms of modern slavery and we are committed to ensuring that modern slavery practices are not taking place in our business operations or our supply chains. We understand that modern slavery is a fundamental breach of human rights and that it can take many forms, such as debt bondage, forced labour, human trafficking, bonded labour, etc. We believe that all businesses have a responsibility to identify and eliminate modern slavery in all its forms.

As one of the world’s leading sports and entertainment media companies, we recognise that while our direct operations have a low risk of modern slavery, there may be some risk inherent in our supply chains, depending on the sector of the services we require, the labour source employed, the operating context of the supplier and the contract type employed. We are committed to identifying, remediating and preventing modern slavery in our supply chain.

Our supply chain includes:

- Talent: recruitment, agency and training services
- Technology: providers of computer hardware and software services
- Data: industry and data licensors
- Professional services: accountancy, tax, legal and other similar services
- Advertising and marketing: online and above-the-line marketing services
- Facilities: services to maintain, repair and fit out our offices and sites of operation

We recognise that we cannot meet this commitment alone.

Preventing modern slavery is a collective responsibility and any meaningful impact requires a continual dialogue with our suppliers and business partners. We have undertaken a massive effort to understand and identify modern slavery risks in our business and we work with suppliers, experts, partners, civil society and government entities to prevent them. We also seek to assist our suppliers and partners in adhering to our commitments and compliance standards and will cease our partnerships with entities that fail to meet those standards, if necessary.

In this respect, we have implemented a roadmap which includes the rolling-out and monitoring of policies and procedures designed to combat slavery and human trafficking in our supply chain and our business generally.

This statement has been approved by the Board of Directors of beIN Media Group on __ March 2023.

How we address Modern Slavery

We have implemented and are working on improving due diligence processes on our majorly used suppliers. We have KYC questionnaires being deployed which address questions designed to identify slavery and human trafficking risks and explain to suppliers the behaviours and ethical standards that we expect of them. We also have standard contractual terms for suppliers to prohibit the use of forced, compulsory or trafficked labour. While we limit the in depth due diligence to contracts above \$250,000, we are working on a more refined process to capture lower value contracts as well.

Our progress this year

We recognise the need to scrutinise our supply chain to understand where there is a risk. Since March 2022, we:

- ◆ fully rolled out the risk identification and management procedures as part of our procurement activity in all relevant jurisdictions by conducting a risk assessment of our tier one]¹ supply chain applying the supplier risk assessment model previously developed in conjunction with Control Risks, a global specialist risk consultancy;
- ◆ instructed the procurement department and responsible end-users to apply the training they received on the supplier risk assessment model to continually assess all new tier one supply contracts in MENA, Turkey, Asia Pacific, France and the U.S. to further identify any risk of modern slavery in our supply chain;
- ◆ have approved by the Board additional policies (e.g. anti-fraud policy, anti-money laundering policy, etc.) and are having them deployed in the various entities of the Group
- ◆ appointed a key contact person in each of our principal jurisdictions to oversee the supplier risk assessment and due-diligence process in their particular jurisdiction, to ensure proper application of the defined supplier risk standards and compliance requirements, and to monitor and flag any high risk or disqualified suppliers identified; and
- ◆ reviewed our labour rights policy and compliance requirements, which set out our commitment to the fair and equal treatment of all workers in our operations and supply chain on a global level; this involved the re-publication of the policy on our internal and external websites, its communication to all employees, and requesting our tier one suppliers to contractually adhere to such policy; and
- ◆ hired a dedicated resource and are developing a dedicated pool of competencies focused on this area.

Key Risk Areas

Our understanding of the risks of modern slavery in our supply chain is improving. We have now mapped our tier one suppliers within the group with a focus on MENA and Turkey and have since expanded our review to beIN's global tier one suppliers in Asia Pacific, France and the U.S. Our review was conducted using a developed and tested supplier risk assessment model designed to provide an indicative assessment of the risk of modern slavery based on the country-level risk factors and the labour-type risk factors used in the supply of the goods or services by third parties. This review identified that our operations in MENA and Turkey were likely more exposed to certain modern slavery related risks within their supply chains (than our operations in other jurisdictions) due to:

- **The operating context** - there may be a presence of low-cost and/or migrant labour, variances in worker representation and a low-level maturity of third-party suppliers' compliance with local labour laws and legislation; and

¹ A tier one supplier for this purpose is a third party that provides goods or services directly to beIN whose contract value exceeds USD 250,000 per annum.

- **The nature of work** - some of the low skilled third-party supplier contracts supporting our operations in MENA, when considered within the operating context, are likely to be exposed to different or coercive recruitment and employment practices.

Looking ahead

As we look to 2023-2024, we remain committed to improve and refine the processes in place to safeguard against modern slavery, forced labour and human trafficking. We intend to continue discussions and consultations with internal stakeholders in our business, as well as the end-users who interact and deal with suppliers within the wider global network, to maintain assurance that all our tier one suppliers have been mapped and assessed in an accurate fashion and that we are consistent in our global compliance standards and supplier risk assessment practices. Furthermore, we will use the key contact persons appointed in each of these jurisdictions to continue to monitor and review the implemented supplier risk assessment and due-diligence process, which will provide additional insight on any potential supplier risk exposure.

Our “indicative risk” model

To direct our further due diligence on the contracts and suppliers that could be at-risk of modern slavery, we continued to use data sources on the country and labour basis where the goods or services would be sourced from and delivered. We used two primary external data sources; a country-level labour market risk rating provided by a global specialist risk consultancy Control Risks’ CORE platform and open-source data from the Global Slavery Index 2018 (“GSI”). Our indicative risk model (supplier risk assessment model) combines data from both sources to determine an initial risk rating for each contractor to guide further due diligence practices. By March 2024, our supplier risk assessment model shall reflect all updates made to the GSI, if any.

We are currently considering how best to apply these risk identification and management procedures to suppliers below tier one or lowering the tier one value. As this requires significant additional human and financial resources, we are expecting some delay in implementation.

We are also benchmarking various third party risk management portals in order to help develop a fully dedicated compliance and HSE process, including the fight against human trafficking and modern slavery.

Labour rights policy

We introduced a labour rights policy and compliance requirements, setting out our commitment to the fair and equal treatment of all workers in our operations and supply chains before the World Cup. The policy is based on best practices from the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation Fundamental Conventions, and recognised international frameworks including the Dhaka Principles for Migration with Dignity. We have rolled out our policy to all employees and tier one suppliers. We require that our commitments are understood and implemented by all employees, tier one suppliers and business partners, who are contractually required to adhere to and apply them in their own supply chain. We have also liaised with all key contact persons in each of our main jurisdictions to ensure the application of the beIN labour rights policy and associated compliance requirements by all responsible end-users and have requested notification of any high risk or disqualified suppliers identified.

Looking ahead

The labour rights policy, trainings and commitments will continue to be reviewed and updated as necessary to remain in line with international best practices. We recognise that a policy alone does not prevent modern slavery abuses. To ensure that our suppliers ‘walk the walk’, we have included an express acknowledgement of and undertaking to comply with our labour rights policy in any new or renewed contracts with suppliers. Throughout 2023-2024, we will continue working with procurement and end-users for feedback on the labour rights policy and whether we can further identify ways in which its implementation can be improved.

Due diligence and monitoring

To support the compliance with our labour rights policy, we have developed a due diligence process for our procurement department to use during contract tender and renewal, that builds on our indicative risk model and requires our internal end-users to provide relevant and up to date information about suppliers - followed, where required, by an assessment of documentation to ensure compliance with our labour rights policy.

The application of the supplier risk assessment model, labour rights policy and its supplier compliance checklist and guidance enables us to implement a robust supplier due diligence program and procedures for new suppliers as part of the group contract awarding evaluation process.

Our due diligence process (Procurement)

All new suppliers will first be rated by our end-users using the indicative risk model (supply risk assessment model). The procurement team will work with end-users within the business to confirm the country where the services are performed, and the labour type used to deliver the service required. Where a supplier is assessed as medium or high risk, we will require the supplier to submit evidence of compliance with our labour rights policy and compliance requirements. In addition, where a supplier is still found to be a high risk following the submission of evidence, a further dialogue will be held with the supplier to manage the risk or disqualify the supplier from the tender process. Where the supplier is accepted, monitoring will be triggered to address the root causes of the issues identified. Any supplier assessed as extreme risk will be automatically disqualified from the tender.

Looking ahead

The supplier compliance checklist and guidance has been implemented within our procurement and supplier awarding process and will be an evolving document as we strengthen our understanding of modern slavery risks and labour rights abuses. At the end of 2023, we will look to refine and update the supplier compliance checklist and guidance based on feedback from the suppliers, internal end-users and the assessment findings, as necessary. We are also looking to further implement due diligence processes and internal controls with regards to vetting third parties beIN intends to work with. We are looking forward to deploying additional commitments in this respect all our contracts notwithstanding their value.

Monitoring

No suppliers have been disqualified during 2022. Our monitoring criteria are based on our own labour rights policy which details high level principles and specific compliance requirements, incorporating key applicable elements from the International Finance Corporation Performance Standards 2 on Labour and Working Conditions², and the Global Reporting Initiative Social Standards³.

Looking ahead

In 2023-2024, we will continue to identify medium and high-risk suppliers and conduct monitoring activities targeting suppliers operating within all the jurisdictions covered by beIN. The monitoring activities will vary depending on the type of services or products provided by the supplier, but may include visits to the suppliers' corporate offices to review documentation indicative of their employment practices, direct interviews with suppliers' employees, inspections of employer-provided accommodation to assess living conditions or inspections of production facilities to assess the working conditions. We will also ask end-users to provide sufficient supporting documentation for revalidation of any suppliers identified as being medium or high-risk. Each monitoring activity will be conducted in line with our labour rights policy and compliance requirements and will aim to identify not only the issues of concern but to assist the supplier in remedying the issues.

² www.ifc.org

³ www.globalreporting.org

Education

We have an opportunity to have a positive impact in our supply chain through educating our suppliers and working with them to improve their employment practices. To support the implementation of our labour rights policy we have developed guidance for suppliers and have communicated our policy and compliance expectations throughout our global tier one supply chain and intend to continue to update this guidance when and as necessary. We also involved the internal end-users in the initial assessment of suppliers and provided training on how to properly enforce the supplier risk assessment model and labour rights policy so as to ensure that they are actively seeking assurance of the suppliers' ability to comply with all requirements. The findings of our assessments and subsequent risk ratings are analysed and salient issues of concern are extracted and reported on to relevant internal stakeholders.

Looking ahead

In 2023-2024, we intend to review and update our supplier guidance as necessary to continue the positive impact and improve our suppliers' employment practices. We will also continue to provide any additional internal training to the end-users and procurement team as required and to promote charities supporting this cause.

Grievance reporting and remedy

We understand that the success of tackling modern slavery risks in our supply chain will depend on communicating our labour rights policy throughout our supply chain and in enabling concerns within our operations to be reported to us. It is important to us that those affected, as well as those witnessing violations, can raise complaints freely and get effective resolutions at all stages of employment, including the recruitment process.

Looking ahead

In the past years we have been investigating potential options to assess which grievance reporting mechanism would be most suitable to meet our above mentioned aims. Currently, there are ad-hoc remedies available to address any issues identified. We are, in parallel, continuing to make progress in developing and selecting a solution that ensures that any issue reported is fully investigated and assurances are given that workers are not penalised as a result. A whistleblowing policy has been validated by the Board and will be deployed in the coming weeks.

Authorised Signatory:

A handwritten signature in blue ink, appearing to read "Yousef", written over a horizontal line.

Yousef Mohammed AL-OBAIDLI
GCEO beIN Media Group WLL

Date of signature: 21 March 2023