

## Modern Slavery and Human Trafficking Statement 2024

beIN Media Group WLL (“**beIN**”) is a multi-national media company with operations in Pay-TV, Sport, Original Programming, Movies and General Entertainment in 40 countries across 5 continents and in 9 different languages spanning across Europe, North America, Asia, Australia and the Middle East & North Africa (“**MENA**”). We recognize that our activities, and those of third parties that form our supply chain, provide numerous opportunities to positively impact our employees’ working conditions and living environments. This is why beIN means 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, and beIN IH Limited (the “**Companies**”). Our statement identifies the steps we have undertaken (in our most recent financial year) to better identify and address the risk of Modern Slavery or human trafficking that may potentially occur as a result of our relationship with certain suppliers or partners.

**This statement has been approved by the Board of Directors of beIN Media Group on March 25, 2024.**

### About us

beIN IP Limited is the content acquisition management platform for the beIN Group and the network of the beIN Sports channels worldwide. The functions of beIN IP Limited are supportive of beIN’s Group strategy, with its responsibility for the acquisition of sports media rights on behalf of beIN Media Group and its subsidiaries. beIN IP operates under the strategic direction of the Group CEO. beIN IH Limited is the holding company of beIN IP Limited and beIN Entertainment LLC in the U.S.

### Our Commitment

beIN has a zero-tolerance policy regarding modern slavery or human trafficking in any form. Our goal is to uphold the highest work ethical standards while remaining performant in business by looking for and implementing continuous improvement.

beIN is against all forms of Modern Slavery and is committed to ensuring that Modern Slavery and such inhumane practices are not taking place in our business operations or within our supply chains. Modern Slavery and Human Trafficking are the most fundamental breach of human rights. They can take many forms, such as debt bondage, forced labour, bonded labour, etc. We believe that all businesses and their employees have a responsibility in identifying and eliminating Modern Slavery in all its forms.

As one of the world’s leading sports and entertainment media companies, we recognize 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

### How we address Modern Slavery

We recognize 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 are committed to cease any partnerships with entities that fail to meet those standards, if necessary.

In this respect, we have deployed policies and procedures designed to combat Modern Slavery and promote human rights in our supply chain and our business generally.

## Our progress this year

### 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 have deployed customized due diligence processes on new and renewed suppliers. We have requested signed statements from our lowest value contractors and developed several questionnaires which address questions designed to identify noncompliance issues and in particular modern slavery and human trafficking risks based on each supplier risk level.

We also introduced guidelines in the questionnaires to better educate our suppliers on the behaviours and ethical standards that we expect from them. We also have standard contractual terms for suppliers to prohibit the use of forced, compulsory or trafficked labour force. While we limit our in-depth due diligence to contracts above \$250,000, we are now deploying questionnaires to capture lower value contracts as well.

Continuously improving the scrutiny on our supply chain to better assess our risk areas, since March 2023, we:

- ◆ fully rolled out the risk identification and management procedures as part of our procurement activity in all relevant jurisdictions by conducting a due diligence of some other new 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 the Board approved additional policies (e.g. anti-fraud policy, anti-money laundering policy, etc.) deployed in the various entities of the Group by a dedicated announcement from our GCEO;
- ◆ had our local key contact person in each of the jurisdictions where we operate, monitor and flag any high risk or disqualified suppliers identified;
- ◆ hired more dedicated resources to develop a dedicated pool of focused competencies; and
- ◆ initiated conversational coaching with the dedicated local department and responsible end-users on updates that have been made so far and the automation of same that is considered for the future months.

## Key Risk Areas

Our understanding of the risks of Modern Slavery in our supply chain is improving.

We have now mapped our tier one<sup>1</sup> 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 growing 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
- **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 2024-2025, 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 and other main suppliers have been mapped and assessed in an accurate and 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.

We are currently considering how best to apply these risk identification and management procedures to more suppliers below tier one or lowering tier one value. We have thus started working on automating the vendor compliance due diligence and will make the compliance risk assessment tool, interact with the vendor portal software used by our finance team. We are also benchmarking various third-party risk management consultants in order to help develop a fully dedicated and CSR compliance 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.

Any new vendor is also asked to sign a dedicated statement according to which it is complying with beIN policy with regards, among other subjects, the fight against Modern Slavery. This statement is applicable to all vendors, notwithstanding their size, region or value.

## Looking ahead

The labour rights policy, trainings and commitments will continue to be reviewed and updated as necessary to remain in

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<sup>1</sup> 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.

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 2024-2025, 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 and local solutions shared.

## 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 Compliance Program and Risk Management Process. In the course of the coming months, aligning our automated due diligence process with our procurement vendor portal software, will enable us to refine and update the supplier compliance checklist and guidance based on feedback from the suppliers, internal end-users and the assessment findings, and the automated reports generated by our software.

We are also looking to further implement due diligence processes and internal controls with regards to vetting third parties beIN intends to work with by developing dedicated trainings on third party identification. We are also negotiating additional commitments in this respect within our contracts notwithstanding their value.

## Monitoring

All Risk Champions appointed in the regions in which we operate have reported that no suppliers had been disqualified during 2023 on the basis of non-compliance with our Labour Rights Policy or the Modern Slavery Act (nor any other violation of a beIN Compliance Policy).

Our monitoring criteria are based on international and local laws and regulations, our own compliance program and policies, which details high level principles and specific compliance requirements, and the processes we are implementing and enforcing on a regular basis for any new Request for Proposals, Tender Offer, Agency Letter or Agreements. We will be training employees and managers on the basis of the highest standards: Respect, Integrity, Accountability and Promoting Human Rights through reporting any potential violations, are the core of our compliance program and the basis for our Code of Business Conduct.

### Looking ahead

In 2024-2025, 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 can 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 compliance program and corporate social responsibility project. It will consist not only in identifying the compliance concerns but also in working with the supplier to mitigate and remedy any such concerns.

## 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 expectations and compliance policies throughout our entire supply chain, especially tier one suppliers and intend to continue to update this guidance when and as necessary.

We also continued involving 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 2024-2025, 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.

We intend to align the e-procurement and vendor portal software with the automated due diligence on third party questionnaires so that any compliance risk assessment in particular linked to Modern Slavery or an activity having a significant negative impact on human rights is reported in real time to both procurement, compliance and risk management teams.

## 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. A whistleblowing policy has been validated by the Board and deployed in April 2023, trainings on the best use of our compliance inbox and speak up mechanism will be made available in English with local sub-titles this year along with crisis management exercises and quiz when all the values of the Group have been duly explained, implemented and as the case may be, enforced.

### Authorised Signatory:



**Yousef Mohammed AL-OBAIDLI**  
GCEO of beIN Media Group WLL