GAME’S ETHICAL TRADING PRACTICES

Human Rights and Anti-Slavery Transparency Statement

The below statement has been prepared in accordance with the Modern Slavery Act 2015 (the “Act”) and sets out steps taken within the business to prevent slavery and human trafficking.

Our Business and its Supply Chains

GAME Digital plc (the “Company”) is the ultimate parent company of GAME Retail Limited (“GAME”) which operates retail stores and concessions across the UK. The products GAME sells are sourced from a broad range of national and some international suppliers. Physical products range from gaming consoles, software and related accessories to merchandise including apparel. International supplier relationships are managed by our dedicated commercial teams.

Related Policies

When sourcing quality products for our business, we endeavour to partner with suppliers that comply with both the spirit and the letter of the law in relation to the prevention of slavery and human trafficking and share our core principles. These include not participating or working with organisations that operate inappropriate or unfair working practices. We look to ensure that our suppliers maintain satisfactory working conditions and comply with all legal requirements with respect to labour practices, health and safety, human rights and environmental protection standards of the countries in which their businesses operate.

Our values apply equally to all companies across the Group and are set out in our Business Code of Conduct which our suppliers are required to comply with. Our Business Code of Conduct sets out our policy on employees, legislation, child labour, conditions of employment, wages and benefits, health and safety, the environment and modern slavery and human trafficking.

Risk Assessment and Due Diligence

We work with reputable service providers, many of which are also subject to the Act. We take the management of our supply chain seriously and believe that it is important to responsibly select supplier partners.

Significant progress has continued to be made with all first tier commercial partners contacted as part of a high-level assessment of the businesses’ exposure to the risk of modern slavery and human trafficking.

All first tier supplier partners have contributed their information and additional information has been sourced or requested to enable the business to get a full picture of risk. As a result of this review, several suppliers have been flagged as potentially being high risk (where, for example, their production facilities are located off-shore) and we are in the process of determining the steps required to audit these high-risk suppliers. Where clear non-compliance with our processes by suppliers has been identified, we have terminated a small number of contracts. Work is also underway to identify our second tier commercial suppliers with a view of gathering information by following similar risk assessment processes.

We have made significant progress with first tier non-commercial suppliers in 2018, covering: temporary staff; logistics and distribution; security and guarding; our customer services centre; and cleaning and catering. Multi-functional meetings have been held internally and the approach taken with commercial partners has been shared to ensure consistency with process and to ensure best practice.

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All first tier non-commercial suppliers have been contacted and an initial review of feedback is underway. Each returned questionnaire will be reviewed and assessed in line with the processes followed for our commercial suppliers.
Our due diligence procedures for supplier on-boarding have also been updated to include our modern slavery policy and processes of review, with a plan to roll this out. Our supplier audit processes are being reviewed to ensure they identify any risk of modern slavery and human trafficking.

Ensuring Effectiveness

Whilst we have taken steps to analyse the risk that suppliers may pose and were satisfied with the responses to our initial enquiries, GAME will continue to monitor suppliers in this area. Should any instances of non-compliance with the Act arise in relation to any of our suppliers then this will be reviewed and appropriate action taken.

Related Training

We continue to communicate the requirements of the Act to GAME’s key partners in the UK and briefing sessions have again taken place with the commercial and non-commercial representatives responsible for liaising with suppliers and the wider Group. We regularly communicate to the business updates to related policies that highlight the risk of modern slavery, housed on our e-learning zone. The second phase of the development of our E-learning zone is in progress and will involve an interactive quiz to encourage learning across all GAME employees.

2019 Action Plan

We are aiming to build on the progress made in 2018, with the following action plan in place for 2019:

- Further investigate suppliers where we have identified a risk, through engagement and visits to supplier premises, conducted directly or by a third-party agency.
- Continue the assessment process on first tier, non-commercial suppliers.
- Continue to develop the e-learning programme, tailored to specific audiences in the business with all buyers required to attend a quarterly refresher training session.

The above statement was approved by our Board of Directors of GAME Retail Limited and GAME Digital plc on 6 December 2018.

For and on behalf of the Boards of GAME Retail Limited and GAME Digital plc.

Martyn Gibbs
CEO
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