

## ZeniMax Europe Limited's Statement on U.K. Modern Slavery Act

### 1. INTRODUCTION

- 1.1. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015(the "Act") and constitutes ZeniMax Europe Limited's slavery and human trafficking statement for the financial year ending March 31, 2020.

### 2. ORGANISATION'S STRUCTURE & BUSINESS ACTIVITY

- 2.1. ZeniMax Europe Limited ("ZeniMax Europe", "We", "Our") is a UK limited liability company, part of the ZeniMax Media companies (the "ZeniMax Group") and a wholly owned subsidiary of ZeniMax Media Inc. which has its headquarters in the USA. ZeniMax Europe's principal business activity is the marketing, publishing and distribution of interactive entertainment software and original video game content developed by ZeniMax Media Inc.
- 2.2. The ZeniMax Group business is organised by territory across North America, Canada, Europe, Russia, Australia and Asia, and ZeniMax Europe operates through a number of its subsidiary companies, and also with local partners.
- 2.3. This Statement is made on behalf of ZeniMax Europe's operations in the UK although its principles, policies and the processes referenced herein are shared by our overseas subsidiaries.

### 3. OUR SUPPLY CHAIN, RISK ASSESSMENT & DUE DILIGENCE PROCESSES

- 3.1. ZeniMax Europe's supply chain predominantly consists of suppliers and partners based in the UK and overseas.
- 3.2. ZeniMax Europe is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We currently believe the risk of slavery and human trafficking within our supply chain to be low. We only work with reputable suppliers, many of whom are subject to the Act, and carry out internal risk assessments and due diligence with our suppliers.
- 3.3. ZeniMax Europe implements a zero-tolerance policy with its suppliers and partners in respect of slavery and human trafficking. Our terms of business require each supplier or partner to comply with and procure from its affiliates compliance with the principles of the Modern Slavery Act 2015.

### 4. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING AND TRAINING

- 4.1. Our internal policies affirm the importance we place on fair treatment and integrity within the workplace and in all our business relationships. The policies communicate the risk assessment factors to be considered and protocols to be implemented to detect the risk of slavery and/or human trafficking taking place anywhere along our supply chains.
- 4.2. ZeniMax Europe's internal employee policies require all staff to act responsibly, professionally and ethically and to ensure at all times they are complying with the law, encouraged to report illegal activity or misconduct and have appropriate sanctions in place for instances of non-compliance.

## **TRAINING**

4.3. ZeniMax Europe provides its staff with training relevant to their respective roles and continues to engage in discussion and address slavery & human trafficking issues through direct dialogue with stakeholders, remaining conscious of future training opportunities for its personnel.

## **5. FURTHER STEPS**

5.1. ZeniMax Europe is satisfied that it is appraised of its obligations under the Act and will continue to give slavery and human trafficking importance in its business operations.

This statement on U.K. Modern Slavery Act has been approved by the Board of Directors of ZeniMax Europe Limited.



**J. Griffin Lesher**

**Company Secretary, ZeniMax Europe Limited**