Codemasters Group Holdings Plc
(“Codemasters” or the “Group”)
Modern Slavery Statement September 2019

Introduction

Under Section 54 of the Modern Slavery Act 2015 (the “Act”) Codemasters is required to publish an annual statement regarding the steps it is taking to tackle modern slavery. This is the second statement made by the Group, in which we aim to give a transparent view of our existing progress and future steps that the Group intends to take in combating modern slavery.

Codemasters is committed to tackling modern slavery both through its own business conduct, the behaviours of its employees and throughout its dealing with contractors and the Group’s supply chain. Codemasters fully supports the UK Government and the wider international community in eradicating modern slavery.

Codemasters business

Codemasters is an award-winning British video game developer and publisher with over 30 years of heritage. The Group specialises in high quality racing games including DiRT, GRID, ONRUSH and the BAFTA award-winning official F1® series of videogames.

Codemasters are based in the UK, the Group’s head office and original studio is in Southam in Warwickshire, with two further studios in Birmingham and Runcorn. There are approximately 528 permanent employees located at those sites. A further 30 permanent employees are located at our studio in Kuala Lumpur, Malaysia. The Group turnover for the year ended 31 March 2019 was £71 million. The majority of Codemasters employees are directly engaged in development of premium quality video games, in roles such as artists, programming technicians and quality assurance testers.

The Group’s supply chain

Employee wages and associated costs represent the majority of the costs incurred by the Group in developing video games. Codemasters directly engage a small number of specialist contractors to compliment the internal development teams. Other suppliers regularly engaged by the Group primarily include providers of IT equipment, although these do not represent a high proportion of the Group’s costs. The Group’s supply chain is not inherently exposed to traditionally high-risk areas of modern slavery.

Codemasters policies on combating modern slavery and human trafficking

Whilst there may not be a significant inherent risk of modern slavery in the Group’s supply chain, the Group is committed to ensuring that it eliminates any exposure to modern slavery. Codemasters policy on tackling modern slavery reflects its commitment to effective governance and ethical behaviour in all of its business practices.
Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine right to work in the UK, or Malaysia. We expect all employees to conduct business with honesty and integrity and we have a zero tolerance to bribery and corruption.

We expect the same high standards from those we work with and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We have a clear Whistleblowing Policy which is established on our intranet site: if there are any genuine concerns about wrongdoing or breaches of law these concerns can be raised in confidence without fear of disciplinary action.

**Supplier 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.

We intend to commence an audit of our key suppliers and licensing partners within the next six months and will be introducing specific measures to ensure that our legal obligations under the Act are passed through our supply chain.

**Employee training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, we will provide training to all existing staff by the end of the calendar year. We will also require our business partners to provide training to their staff, suppliers and providers.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes Codemasters Modern Slavery Statement as at September 2019.

This statement was approved by the board of Codemasters Group Holdings plc.

**Frank Sagnier**

Chief Executive Officer
Codemasters Group Holdings plc