

# Modern Slavery and Human Trafficking Statement

## Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) and sets out to identify the actions that the myWorld group of companies under myWorld Holdings Limited (“myWorld Group”) have taken during the financial year ending 31 December 2018 to prevent slavery and human trafficking from occurring in the myWorld supply chains and our business.

The myWorld Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The myWorld Group is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Our Business

With its global headquarters in London, the myWorld Group offers its partners a multitude of services within the spheres of: customer and fan loyalty programmes, media, marketing and advertising.

The Company currently operates in the following countries:

- Australia
- Austria
- Belgium
- Bosnia & Herzegovina
- Brazil
- Bulgaria
- Canada
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hong Kong
- Hungary
- India
- Ireland
- Italy
- Latvia
- Lithuania
- Macau
- Mexico
- Montenegro
- Netherlands
- New Zealand
- North Macedonia
- Norway
- Philippines
- Poland
- Portugal
- Qatar
- Romania
- Serbia
- Slovakia
- Slovenia
- South Africa
- Spain
- Sweden
- Switzerland
- Thailand
- Turkey
- United Arab Emirates
- United Kingdom
- United States of America

## Policies

myWorld Group operates a number of policies which reflect its objective of acting ethically and in line with its legal and regulatory obligations with regard to its employees, customers and business relationships. These policies will be reviewed and updated as necessary.

- The **myWorld Group Code of Conduct** is the standard that myWorld Group sets itself in its relationships with customers, suppliers, colleagues and other parties. The Code of Conduct sets down its approach to the standards expected from each other:
  - Customers - myWorld Group treats customers fairly;
  - Conduct - myWorld Group acts with integrity in its dealings;
  - Colleagues - myWorld Group colleagues are respectful to each other and value the contribution of others.

myWorld Group strives to maintain the highest standards of employee conduct and ethical behaviour.

- **Whistleblowing policy.** myWorld Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, myWorld Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. myWorld Group's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Recruitment policy.** myWorld Group uses only reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## Due Diligence

In order to identify and mitigate modern slavery and human trafficking risks, the myWorld Group adopts a risk-based approach. myWorld Group will:

- Identify and assess potential risk areas in the myWorld Group's business and supply chains;
- Monitor potential risk areas in the myWorld Group's business and supply chains;
- Mitigate the risks of modern slavery and human trafficking in the myWorld Group's business and supply chains;
- Protect whistle-blowers.

## **Training and Awareness**

The myWorld Group is focused on raising awareness of the policies listed above with colleagues. In order to ensure myWorld's staff understand and can identify modern slavery and human trafficking, myWorld Group will develop and provide appropriate training.

myWorld Group's managers will also receive further support, including training and line management guidance to ensure consistency of recruitment processes, fair treatment at work, and inclusion and diversity.

## **Effectiveness**

The myWorld Group will review the effectiveness of its measures in ensuring that there is no modern slavery or human trafficking. These reviews will be used to inform the development of myWorld Group's policies, procedures and best practice.

Pursuant to the delegation of authority approved by the Board of Directors of myWorld Holdings Limited, this Statement has been approved by Kerstin Suppan-Eibinger, Chief Human Resources Officer.

A handwritten signature in blue ink, appearing to read "Kerstin Suppan-Eibinger".

**KERSTIN SUPPAN-EIBINGER**  
Chief Human Resources Officer  
myWorld Holdings Limited

