

# ODEON CINEMAS GROUP

An **amc** company

## ODEON Cinemas Group Statement for the Financial Year ending 31 December 2018 about Modern Slavery

### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement relates to ODEON Cinemas Group Limited companies carrying on business in the UK ("ODEON").

### Our business

ODEON Cinemas Group is a leading European cinema operator hosting over 100m guests each year in over 360 cinemas across Europe, over 100 of which are based in the UK. As an AMC company, ODEON Cinemas Group is part of the largest movie exhibition company in the world with over 1,000 theatres and 11,000 screens across the globe.

### Our approach

ODEON has a zero-tolerance approach to modern slavery of any kind. We are committed to acting ethically, transparently and with integrity in all our business dealings and relationships. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

### Our Supply Chains

Odeon procures a wide range of products / services via a diverse supply chain, including:

- Finished Goods (Seating products, Sound & Projection, Flooring, FF&E, etc)
- Food and Beverage
- Facilities Management Services
- Communications and IT equipment services (hardware, software, licenses)
- Recruitment Agencies
- Advertising, Communications & Marketing Services
- Stationary
- Utilities
- Waste Management
- Temporary Staff
- Various professional services

### Our policies

Our procurement activities take place in all the countries we operate. Our suppliers are UK, EU, and US based.

We expect our Suppliers and other companies we engage with to ensure their goods, materials, services and labour-related supply chains:

- **Comply with the Modern Slavery act 2015, Directive 2014/95/EU, and any other relevant European, regional or local legislation; and are**
- **Transparent, accountable and auditable; and are**
- **Free from ethical ambiguities**

Our Supplier Agreements reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Safeguarding policies include specific guidance for staff on how to recognise signs of abuse, including slavery, human trafficking, forced labour and how to respond to and escalate any concerns.

We have such internal policies as Anti-Slavery & Human Trafficking, Anti-Corruption and Anti-Bribery, Code of Conduct and Whistle blowing. These help ensure that our colleagues know what is expected of them and how we can support them.

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## **Due diligence**

We have asked our existing suppliers to officially confirm how they manage transparency in their supply chains and comply with our requirements. For the new suppliers wishing to collaborate with our company we issue a Pre-Qualifications Questionnaire which includes questions targeted at slavery and human trafficking risk. In this way we can identify the risk and take all the necessary actions. Moreover, we expect our suppliers to provide the relevant supportive evidence proving their statements.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains

We plan to require all our suppliers to confirm their continued compliance on the above on an annual basis and inform us immediately when something changes.

We encourage anyone, including colleagues, suppliers, sub-suppliers, customers, to report in good faith any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking through our duly authorised Directors.

## **Steps we have taken (2018)**

### **Management Responsibility and general awareness**

We have:

- Agreed management responsibility for this policy and statement from our Senior Management Team and Board of Directors
- Raised general organisational awareness by circulating a policy to all staff explaining the rationale of this statement and the actions that they need to take in case they suspect that a conflict with the policy has occurred. It is also required from all the employees at all levels to ensure that they all ready, understand and comply with this policy.

### **Risk Assessment:**

We have:

- Undertaken an assessment to determine our risk exposure.
- Included the Modern Slavery Act 2015 within our risk register to ensure the risk continues to be flagged, assessed and appropriately addressed.

The results of the assessment in the specific area show a low risk. The main reason is Odeon's collaboration with global suppliers and with suppliers that their products need to comply with very strict regulations (i.e. food and beverage). However, we continue to assess working closely and proactively with our suppliers. If Odeon identifies a higher level of risk in regard to Modern Slavery and trafficking, then the company will follow the process according to the Group Procurement Policy.

### **Risk Mitigation:**

We have:

- Added new clauses to our Suppliers' Agreements that deals with modern slavery or human trafficking compliance breach by a supplier.

## **Steps to take - (2019)**

### **Management Responsibility and general awareness**

We will:

- Report progress to our Executive Committee
- Raise awareness of this published statement by notifying organisations with which we regularly engage
- Prepare the next annual statement

### **Risk Assessment:**

We will:

- Commence a review exercise of this policy against our activities to establish whether the approach we are taking can be further improved by:
  - Assessing and interpreting any recent or emerging best practice;
  - Benchmarking our activities against statements and action plans undertaken by similar organisations; and
  - Re-evaluating the risk of non-compliance as part of our circular compliance risk register assessment.

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## **Risk Mitigation:**

We will:

- Act promptly where a compliance breach has been identified or flagged
- Continue to feed back lessons learnt into the compliance risk management process

## **Responsible officers**

The Board of Directors has overall responsibility for our Anti-Slavery and Human Trafficking policy.

The Group Legal and Compliance and the Chief Partnerships and Content Officer have primary and day-to-day responsibility for our Anti-Slavery and Human Trafficking policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

This statement was approved by the Board of Directors

  
Mark Way  
President AMC Europe & Managing Director ODEON Cinemas Group