

DOING THE RIGHT THING



ODEON CINEMAS GROUP

An **amc** company

ODEON

MODERN SLAVERY STATEMENT

This Statement is published in accordance with the UK Modern Slavery Act 2015. It sets out the approach taken by Odeon Cinemas Group Limited and/or its subsidiary companies carrying on business in the UK during the year ending 31 December 2021 to prevent modern slavery in our business and supply chains associated with the United Kingdom. This statement has been approved by the Board of Directors.

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1. Introduction

This is the Modern Slavery statement for Odeon Cinemas Group Limited, and its subsidiary companies in the UK (“ODEON”). This statement outlines the activities we have taken during the last year and shares information on our commitment to reduce risk and prevent slavery and human trafficking in our operations and supply chains.

Modern Slavery is a crime and violation of fundamental human rights and we understand our responsibility in relation to this global issue. ODEON has a zero-tolerance approach to modern slavery. We are committed to acting ethically, transparently and with integrity in all our business dealings and relationships. We also expect the same high standards from all our key suppliers, contractors and other business partners (“Partners”); and we expect that our Partners will hold their own suppliers to the same high standards.

We know that the last 12 months has been an exceptionally challenging period for global supply chains. The COVID-19 pandemic has created unprecedented disruption for our suppliers and supply chains and has brought about an increased risk of modern slavery occurring. We remain committed to our programme of ongoing improvement and will continue to review and adapt, what we do, to manage these risks effectively.

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Mark Way

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Mark Way

President AMC Europe & Managing Director ODEON Cinemas Group



2. Our Business

ODEON Cinemas Group is a leading European cinema operator hosting over 100 million guests each year in over 290+ cinemas across Europe, over 100 of which are based in the UK.

All of our 290+ cinemas offer digital projection and excellent sound technology; and are designed to provide guests with their favourite food and drinks, comfortable seats and a warm welcome every time they visit.

We are proud to be part of AMC Entertainment Holdings Inc, the largest movie exhibition company in the USA, Europe and the world with over 1,000 theatres and more than 11,000 screens across the globe.

We're Europe's largest cinema operator. Our popular brands welcome 100 million guests each year to enjoy great hospitality while watching the latest films & entertainment.



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3. Our Supply Chains

ODEON suppliers are essential to how we operate our business and the successes that we achieve.

We recognize and understand the value of stability in our supply base which is why we have many long-term relationships in place across our key categories.

We work hard when selecting and introducing our new suppliers to ensure that they are aligned with us, in our views on ethics and conduct.

ODEON procures both Food and Beverages (F&B) and Goods Not for Resale (GNFR) products and services through an extensive and diverse supply chain. These include:

- F&B (e.g., popcorn, hot dogs, nachos);
- 3rd Party Logistics;
- Packaging;
- Waste Management;
- Temporary Staff;
- Facilities Management;
- Communications and IT services; (hardware, software, licenses);
- Marketing;
- Professional Services; and
- Utilities.



4. Our Governance and Leadership

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

The Group Legal and Compliance Officer 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.





5. Our Policies

ODEON has a suite of policies and documents, which set out and demonstrate our commitment to standards, ethics and business conduct. They reflect how we work, what we value and what behaviours we expect from our colleagues and suppliers.

Our reputation is one of our most valuable assets, and it depends on our honesty and integrity. We expect every colleague and supplier to be accountable for their actions.

Our policies apply in, and our procurement activities take place in, all of the countries we operate.

We procure globally, and we expect our Partners, 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 and applicable European, regional or local legislation; and
- are transparent, accountable, auditable and 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.

We have internal policies such as: Anti-Slavery and Human Trafficking; Anti-Corruption and Anti-Bribery; Code of Conduct; and Whistleblowing. These policies and documents help to ensure that our colleagues know what is expected of them and how we can support them.

**OUR PEOPLE.
OUR WORLD.**





6. Due Diligence

We ask our key existing suppliers to confirm how they manage transparency in their supply chains and how they comply with our requirements.

For new key suppliers, wishing to collaborate with ODEON, we issue a Request for Proposal document and/or Pre-Qualification Questionnaire which include questions targeted at slavery and human trafficking risk. In this way we can identify risks and take appropriate action. Moreover, we expect our key suppliers to provide the relevant supportive evidence proving their statements.

We have in place methods and/or systems to:

- identify and assess potential risk areas in our supply chains; and
- monitor potential risk areas in our supply chains.

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

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





7. Steps We Have Taken

The COVID-19 pandemic has significantly impacted ODEON and how we have operated over the last 12 months, however we are pleased to confirm that we continue to make progress in how we review and improve our approach to tackling modern slavery.

Management Responsibility and general awareness

We continue to engage with and have reported our progress to our Board of Directors.

We have also communicated and raised awareness of this published statement with our key and/or targeted suppliers.

Risk Assessment

The modern slavery risk assessment is aligned and included in our overall business Supply Chain Risk Programme which considers both internal and external factors.

An assessment has been completed across our supply chain over the last 12 months and the results have been shared with the Board of Directors.

- The assessment benchmarked our activities against statements and action plans undertaken by other companies; and considered any recent or emerging best practice.
- The results of the assessment have allowed us to identify our key focus categories on modern slavery and has led to a project for the enhancement our systems for targeting, monitoring and managing risk across our key suppliers.
- The programme has also identified some opportunities to improve our internal ways of working and we have commenced a review exercise of these policies.





8. What's Next

We are committed to identifying and addressing modern slavery risk in our business and across our supply chain. We will strive to make further improvements over the next 12 months and throughout future years via our Supply Chain Risk programme.

We have identified opportunities for improvement through both supply chain initiatives and enhancements to controls and systems and these improvements are already underway.

We will also make changes and adapt some of our internal ways of working to address the opportunities identified in the assessment through our Supply Chain Risk programme.

Management Responsibility and general awareness

We will continue to engage with and to report our progress to our Board of Directors within the framework of the Supply Chain Risk programme.

We will also:

- keep updating and communicate our principles to companies and suppliers with which we regularly engage; and
- increase the number of suppliers that we seek compliance confirmation from on an annual basis as part of our drive for continuous improvements.

Risk Assessment

We will continue to review our key activities to establish whether the approach we are taking can be further improved by:

- monitoring and interpreting any best practice;
- benchmarking our approach and activities against similar organisations; and
- re-evaluating the risk of non-compliance as part of our Supply Chain Risk programme.

