

ODEON Cinemas Group Statement for the Financial Year ending 31 December 2020 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 and or its subsidiary companies carrying on business in the UK ("ODEON").

Our business

ODEON Cinemas Group Limited and all of its subsidiaries ("Odeon Cinemas Group") is a leading European cinema operator hosting millions of guests each year in over 360 cinemas across Europe, over 100 of which are based in the UK. As a subsidiary of AMC Entertainment Holdings Inc, the 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 key 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.

We procure internationally, and 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 and applicable 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.

Due diligence

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

Additionally, 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 require all our key 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

Management Responsibility and general awareness

We have:

- Reported progress to our Executive Committee
- Raised awareness of this published statement by notifying organisations with which we regularly engage

Risk Assessment:

We have:

- Commenced a review exercise of this policy against our key 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.

Risk Mitigation:

We have:

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

Next Year Steps to take

Management Responsibility and general awareness

We will:

- Keep reporting progress to our Executive Committee
- Keep updating and communicate our principles to organisations with which we regularly engage
- Proceed to tactical controls requiring tangible evidence from our supply chain about their compliance and we will keep relevant records for their progress.
- Seek to continue to broaden the suppliers that we seek compliance confirmation on an annual basis
- Prepare the next annual statement

Risk Assessment:

We will:

- Keep reviewing our key 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.

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