



Modern Slavery Act 2015: Winning Moves' Anti-Slavery and Anti-Human Trafficking Statement (2022 - 2023 and beyond)

This statement, relating to the **financial year ending 31st March 2023 and valid until superseded by an updated statement**, is made pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act') and outlines the steps we have taken as an organisation to assess our operations and supply chains and mitigate any risk of slavery and human trafficking.

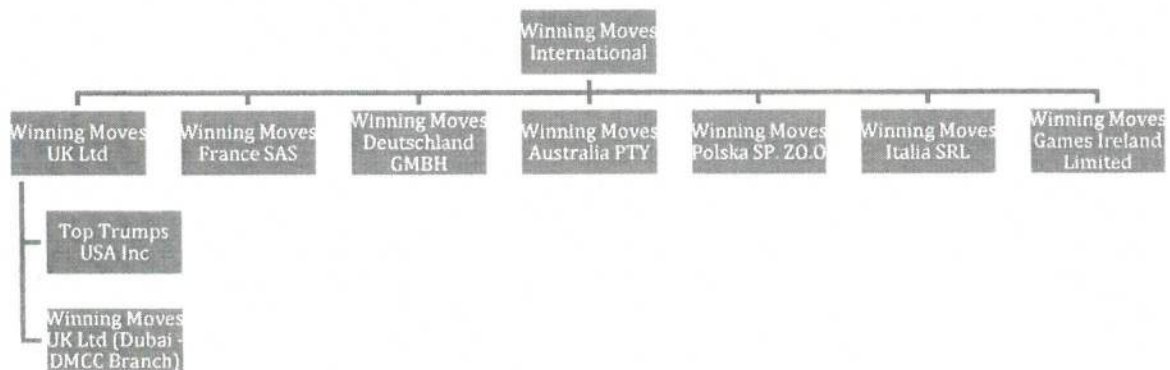
Winning Moves International Ltd, Winning Moves UK Limited and the Winning Moves group of companies more generally ('**Winning Moves**' or the '**Group**') are committed to conducting business ethically and responsibly and fully support the aims of the Act. We are committed to tackling slavery and human trafficking wherever we can, and we are proud to do so.

This statement updates the statement previously published on the Winning Moves' website (at www.winningmoves.co.uk) and has been produced and approved by the Board of Directors following a review of our procedures to ensure that we continue to act responsibly to ensure our full compliance with the Act at all times and to further pursue our commitment to tackle slavery and human trafficking.

OUR BUSINESS

Winning Moves is a designer and supplier of board, card and other games in the toy and game industry. Winning Moves UK Ltd and our ultimate parent company Winning Moves International Ltd are incorporated in England and Wales. The Group has over 200 employees worldwide. Our staff are based in Europe, the USA and Australia. Our staff are largely directly employed and are not in any category which is generally seen to be vulnerable to modern slavery, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers.

ORGANISATION'S STRUCTURE



OUR SUPPLY CHAINS

Winning Moves outsources the production of all products that are offered for sale. We do not own any manufacturing or production facilities. We have a core of about 30 suppliers whom we work with closely on a partnership basis. Our suppliers are based in the United Kingdom, Europe and China. Once



sourced our customers are based mainly in the countries and regions in which we have offices.

Winning Moves is committed to fair, honest and ethical business relationships and we strive to continuously improve, along with our suppliers, without whom we could not operate, in all areas of our business.

In addition to the checks we carry out, we are fully compliant with any audit requests from third parties we work with, who request to audit our supply chains.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our policies 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 policies, which aim to minimise the risk of modern slavery in our supply chain, include:

1. **WM Global Business Ethics Principle (Code of Conduct)** - which is signed by all of our suppliers and includes a section on modern slavery as well as child labour and forced labour.
2. **WM Sustainable Procurement Policy, WM Sustainable Development Policy, WM Quality Management Policy** - these documents set out our approach to our social, ethical and environmental standards and what we expect from our suppliers.
3. **Making a protected disclosure policy** - this encourages staff to report any concerns anywhere in the business including slavery.

We also routinely share with our supply chain any ethics / code of conduct (or similar) policies that our licensors request that we share with our supply chain.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we continually work with all of our suppliers to ensure continued adherence to ethical and social compliance issues. A major part of our business is working with major brand owners, as part of that, we take social and ethical compliance as seriously as we take toy safety. We independently review all suppliers we work with each year.

In addition, for suppliers with manufacturing facilities in areas of high risk we request that the operators of those facilities provide independent ethical audits through either SEDEX or ICTI before we will place any purchase orders or accept any goods from those facilities.

We work with major global labs such as UL and SGS. Where appropriate will independently audit supplier facilities, to ensure compliance with the social and ethical standards we are committed to as a business.

We have in place, through the policies mentioned, systems to:

1. Identify and assess potential risk areas in our supply chains.
2. Mitigate the risk of slavery and human trafficking occurring in our supply chains.
3. Monitor potential risk areas in our supply chains.



4. Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

Winning Moves has a procurement and QA/QC function that monitor all of the suppliers we work with. As well as monitoring, this team sets our values and ethics and ensures they are complied with, via the various policies and processes we have in place.

Should a supplier fail to provide the information requested or to meet expectations, Winning Moves will take appropriate action, which may include not entering into a relationship or terminating the relationship with the supplier concerned.

We have zero tolerance to slavery and human trafficking.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also publish a policy in our staff handbook, for staff to refer to as required. We require our business partners to provide training to their staff and suppliers and providers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We continually monitor our employees and suppliers. Our main KPIs with regard to modern slavery are:

1. Social and Ethical audits - no instances this year.
2. Corrective Action Plans - no instances this year.
3. Supplier review - all supplier deemed as compliant to Winning Moves standards this year.
4. Protected disclosures - no instances this year.

FURTHER STEPS

As we develop as a business, over the course of the next financial year and beyond, we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in our business and in relation to new and existing suppliers. We are committed as a business and it's a fundamental part of our commitment to our brand partners and customers.

This statement was prepared by the Procurement and QA/QC teams at Winning Moves and has been approved by the Board of Directors. It is signed for and on behalf of Winning Moves International Ltd and its subsidiaries.

PAUL BOUGHTWOOD

Winning Moves UK Limited

Winning Moves International Limited

27 April 2023