

Modern Slavery Act 2015 Statement – NaturalMotion Games Limited



NaturalMotion Games Limited is an award-winning company whose mission is to enrich lives through play. Our values are to be proud, aim high, stay hungry and be honest. As a responsible corporate citizen, NaturalMotion Games Limited seeks to ensure that, throughout its business and supply chain, appropriate standards are maintained by well treated and fairly compensated workers in accordance with all applicable laws. In 2018, and again in 2019, NaturalMotion Games was recognised as one of the Best Places to Work in the UK video games industry.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “MSA”) and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019. We set out the steps taken by NaturalMotion Games Limited to ensure that slavery and human trafficking is not occurring in our business or supply chains.

Our Structure and Our Business

NaturalMotion Games Limited is a wholly owned indirect subsidiary of Zynga Inc., a company incorporated in the United States. The principal activity of NaturalMotion Games Limited is developing and publishing video games for use on mobile devices. These games have covered a range of genres, including racing, strategy, sport and puzzle.

NaturalMotion Games Limited develops its games at a studio in London, as well as at BossAlien, a NaturalMotion studio based in Brighton. NaturalMotion Games Limited provides services related to the research and development of mobile and social games for smartphones, tablets and other connected devices to its ultimate parent company, Zynga Inc. The average monthly number of staff for the year ended 31 December 2019 was 218.

Policies and Procedures

NaturalMotion Games Limited is committed to strengthening its practices in order to deter, detect and counter any modern slavery or human trafficking in any part of its business or its supply chain. NaturalMotion Games Limited acknowledges that its greatest strength is its employees, and accordingly has implemented certain policies and procedures. Key policies are reviewed at least annually and are circulated annually to employees.

NaturalMotion Games Limited has recruitment procedures that include pre-employment screening of all staff to ensure they have the right to work in the UK.

Our Code of Business Conduct and Ethics sets out the commitment of NaturalMotion Games Limited to fair treatment and a respectful workplace. We also have a Workplace Violence Policy. Everyone who works at NaturalMotion Games Limited must act responsibly, professionally and ethically, and follow the law. Our Code of Business Conduct and Ethics also requires people to report suspected misconduct or illegal activity, and sets out that employees should feel comfortable doing so without fear of retaliation. Such reports, or reports about human rights violations, should be made to a manager, anyone in an individual’s reporting chain, or a member of Human Resources or Legal staff. NaturalMotion

Games Limited runs a reporting hotline, available via phone or email or online, and a conduct helpline, available via phone or email.

Any employee who does not follow the Code of Business Conduct and Ethics could be subject to disciplinary proceedings, including termination of employment.

Due Diligence

NaturalMotion Games Limited selects goods and materials from preferred vendors of record, with reassessment of these vendors carried out over time. NaturalMotion Games Limited also screens potential vendors for compliance with applicable laws, including the MSA. All agreements with third parties must also be in writing and signed, and must include appropriate language requiring compliance with applicable laws, including the MSA. All vendor and supplier procurement agreements are reviewed and authorised by the Finance/Procurement department, and meetings are held with business representatives to ensure compliance with contractual terms.

NaturalMotion Games Limited has carried out a risk assessment and believes that there is a low risk of slavery or human trafficking in its supply chain. The company interacts with suppliers from around the world, in several countries, including jurisdictions such as India, Turkey, and Ireland (countries with a medium risk of modern slavery according to the Global Slavery Index). These suppliers provide the company with services and resources related to game operations, IT and marketing and user acquisition. The nature of these services means that we consider ourselves to be at low risk, making generally no use of unskilled labour. If a suspicion does arise that a supplier is involved in activities related to modern slavery or human trafficking, NaturalMotion Games Limited will carry out an investigation and take prompt remedial action where necessary.

Training

All employees of NaturalMotion Games Limited are given training on the Code of Business Conduct and Ethics when they join the company, and are also required to participate in refresher compliance training every 18 months. This training includes UK-specific anti-bribery and corruption.

Further Steps

The majority of NaturalMotion Games' suppliers are long-term (greater than one year). We conduct an annual survey of all vendors, as well as periodic assessments. NaturalMotion Games Limited may (and has) taken appropriate remedies as a result of such assessments. NaturalMotion Games Limited will continue to monitor its policies, procedures and relationships with third parties to ensure ongoing compliance. NaturalMotion Games Limited also continues to review its procedures with respect to onboarding and monitoring of third party partners and vendors, in order to identify further areas for continued improvement.

This Modern Slavery Act Statement has been approved by the Board of Directors of NaturalMotion Games Limited.

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JOHN PARSONS

Director of NaturalMotion Games Limited