

## **Modern Slavery Statement for the financial year ended 31/12/2021**

### **Introduction**

2022 is the fourth year for which Sumo Group plc is required to produce a statement under the Modern Slavery Act 2015, in relation to the period 1<sup>st</sup> January to 31<sup>st</sup> December 2021.

### **Business Structure**

Sumo Group's award-winning businesses provide creative and development services to the video games and entertainment industries in the UK, India, Canada, and Poland. Group turnover for the financial year ended 31<sup>st</sup> December 2021 was £112.2m.

Sumo Digital, our largest business, is one of the UK's largest independent developers of AAA-rated video games. The business includes five city studios and a further four that operate under their own names, The Chinese Room, Red Kite Games, Secret Mode and Lab42. Sumo Digital also has studios in Pune and Bangalore in India.

Atomhawk, a complementary business acquired in June 2017, operating in the UK and Canada, is a multi-award-winning visual design company, servicing the games, film, and visual effects industries.

Timbre Games and PixelAnt are two further video game development studios in the group, located in Vancouver and Poland, respectively.

The group employed 1,409 staff at the end of 2021, primarily in the development of video games and the provision of creative services. A small proportion of our staff are employed in supporting business roles. We engage independent contractors and agencies to contribute to projects and specialist consultancy services to meet business needs

### **Policy Approach**

Sumo Group has written policies on equal employment opportunities and whistleblowing that are communicated to all employees when they first join the company. These policies underpin fair and legal employment practices across the Group.

We conduct pre-employment screening on all hires for their right to work in their main country of employment before they begin their role, and we support employees who wish to relocate to do so in the right way.

The Group has an internal procurement policy which includes a commitment to purchasing only from suppliers that will provide information on their fair working practices and opposition to modern slavery and human trafficking.

### **Our Supply Chains**

The nature of our business poses a relatively low risk of modern slavery and human trafficking within our core activities. Talented staff are in high demand, and we operate in a competitive recruitment environment to attract and retain the best employees in all our countries of operation.

Sumo Group directly employs the staff supporting its core business and pays their wages. 753 employees were based in the UK at the end of 2020. 151 staff were based at studios in Canada and India.

In addition, we work with independent contractors to support our core activities. These individuals are engaged through Master Services Agreements with the relevant Group business. In 2021, 113 independent contractors were registered with Sumo.

Providers of ancillary services such as cleaning, security and maintenance are either employed directly as part of our team, or the services are obtained through registered companies under defined contracts. Sheffield is the only studio to directly employ cleaning staff, all other locations outsource this work to third party providers.

### **Risks Related to Modern Slavery**

We have judged our business to be at a low risk of participating in modern slavery and human trafficking. Our studios are in countries rated B or higher for the government response to slavery by the Global Slavery Index.

India ranks 53/167 in the Global Slavery Index for the prevalence of Modern Slavery, and a Government Response Rating B. We contract relatively few services in India due to the size and nature of our operation. During 2021 we did not contract any new on-site services due to the COVID-19 pandemic.

### **Due Diligence Processes**

We contract services from registered companies, or directly with contractors where they are a sole trader. Many of the larger UK companies that we work with will also be required to publish a Modern Slavery Statement.

We added 338 new suppliers in 2021 and asked them to provide information about their anti-slavery and human trafficking processes. Of those 338, 307 suppliers returned information to be assessed and were judged to be low risk.

56 new suppliers were direct working relationships with an individual to supply their services under a Master Services Agreement.

31 new suppliers (9%) did not return a completed risk assessment before being set up. One supplier was a large UK plc and 30 are suppliers to the Group's newest acquisition outside the UK, PixelAnt, where we are reviewing our supplier onboarding processes. We will take steps during 2021 to improve our due diligence and follow up processes to minimise the number of suppliers not captured by the assessment.

### **Training for Employees**

There was no training for employees on matters specifically relating to Modern Slavery or Human Trafficking during 2021. Management staff participated in training related to equal opportunities, anti-bias, and anti-discrimination during the year.

This statement has been approved by the Board of Sumo Group Ltd.



Andy Stewart, Chief Financial Officer