

# Modern Slavery Statement

## Financial year ended 31/12/2022

### Introduction

2023 is the fifth year for which Sumo Group Limited (formerly Sumo Group plc) is required to produce a statement under the Modern Slavery Act 2015, in relation to the period 1st January to 31st December 2022.

### Business Structure

Sumo Group's businesses have provided acclaimed development, design and publishing services to the video games and entertainment industries for 20 years from studios in the UK, Europe, India and Canada. Group turnover for the financial year ended 31st December 2022 was £114.9m.

Sumo Digital is the Group's primary business. It is one of the UK's largest developers of AAA-rated video games providing turnkey and co-development solutions to a global blue-chip client base from studios in Sheffield, Newcastle, Nottingham, Leamington Spa and Warrington, plus Pune and Bangalore in India. BAFTA award-winning The Chinese Room in Brighton, Red Kite Games in Leeds, Lab42 and Midoki studios in Leamington Spa, PixelAnt Games in Wroclaw, Poland and Czech Republic and Timbre Games based in Vancouver, Canada also fall under the Sumo Digital umbrella along with the award-winning design studio Atomhawk, who have bases in the UK and Canada.

Secret Mode is a video games publisher, focused on delivering fresh and new gaming experiences to players and building expansive and fulfilling communities around those games. It publishes titles developed within Sumo Group and also by independent developers.

Auroch Digital is a Bristol-based videogame developer and publisher with a focus on original IP creation.

The group employed 1,549 staff at the end of 2022, 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. 1,218 employees were based in the UK at the end of 2022. 80 employees were based in Poland and the Czech Republic, and 228 staff were based at studios further afield in Canada and India. A further 24 individuals outside of these countries work directly for Sumo Group but are employed in their home country by an Employer of Record service provider on our behalf.

In addition, we work with contractors to support our core activities. During 2022, 451 individuals worked with Sumo either as independent contractors under Master Services Agreements, or as employees of subcontracted companies.

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 that most of our businesses' activities are in relatively lower risk countries for the prevalence of modern slavery and human trafficking, with both the United Kingdom and Canada's prevalence estimated at 1.8 people per 1,000 of the population by WalkFree.org. In Poland the prevalence is estimated to be 5.5 and in Czechia 4.2 per 1,000. The ILO2 estimates people in modern slavery in these regions to be 6.8% (Europe and Central Asia) and 5% (Americas) respectively.

India's prevalence of people in modern slavery is estimated at 8 per 1,000 by WalkFree.org with the ILO estimating that 6.8% of the Asia-Pacific region's population was in modern slavery in 2022. We contract relatively few services in India due to the size and nature of our operation.

We have judged that our business' activities are in lower risk sectors and in lower risk countries. Sumo employs skilled staff with complex technical proficiencies, who are free to move within a highly competitive labour market.

## **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 412 new suppliers in 2022. 393 suppliers were asked to provide information about their anti-slavery and human trafficking processes. 19 suppliers were added for Sumo India, which does not follow the same process. We obtained satisfactory information about 364 of these suppliers.

Of the remaining 29 non-responding suppliers, 22 supply our Eastern European studios and 7 are UK suppliers that have not responded to our enquiries yet.

During 2023 and 2024, we will ensure that the procurement policy is fully rolled-out to all Sumo businesses globally, and that due diligence is conducted at the same stage as for our UK entities.

### **Training for Employees**

There was no training for employees on matters specifically relating to Modern Slavery or Human Trafficking during 2022. Management staff participate in training related to equal opportunities, anti-bias, and anti-discrimination as part of management development.

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

Andy Stewart, Chief Financial Officer