

ZeniMax Europe Limited's Statement on U.K. Modern Slavery Act

1. INTRODUCTION

1.1. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes ZeniMax Europe Limited's modern slavery and human trafficking statement for the financial year ending 31 December 2023.

2. ORGANISATION'S STRUCTURE & BUSINESS ACTIVITY

2.1. ZeniMax Europe Limited ("ZeniMax Europe", "We", "Our") is a UK limited liability company, a wholly owned subsidiary of ZeniMax Media Inc. which has its headquarters in the USA. ZeniMax Europe's principal business activity is the marketing, publishing and distribution of interactive entertainment software and original video game content developed by ZeniMax Media Inc. and its subsidiaries (collectively referred to as "ZeniMax Media").

2.2. ZeniMax Media's business is organised by territory across North America, Canada, Europe, Australia, Asia. ZeniMax Europe has established and operates through subsidiary companies in a number of these territories, and also via local partners.

2.3. This Statement is made on behalf of ZeniMax Europe's operations in the UK although its principles, policies and the processes referenced herein are shared by our overseas subsidiaries.

3. OUR SUPPLY CHAIN, RISK ASSESSMENT & DUE DILIGENCE PROCESSES

3.1. ZeniMax Europe's supply chain predominantly consists of suppliers and partners based in the UK and overseas.

3.2. The nature of ZeniMax Europe's business does not centre on the manufacture or production of hardware nor does ZeniMax Europe require services directly or via recruitment agencies that are typically performed by migrant workers. While we currently believe the risk of slavery and human trafficking within our supply chain to be low, ZeniMax Europe remains committed to the exclusion of modern slavery or human trafficking from our supply chains or in any part of our business. We only work with reputable suppliers, many of whom are subject to the Act, and carry out internal risk assessments and due diligence with our suppliers.

3.3. ZeniMax Europe implements a zero-tolerance policy with its suppliers and partners in respect of slavery and human trafficking. Our terms of business require each supplier or partner to comply with and procure from its affiliates compliance with the principles of the Modern Slavery Act 2015.

4. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING AND TRAINING

4.1. Our internal policies continue to affirm the importance we place on fair treatment and integrity within the workplace and in all our business relationships. The policies communicate the risk assessment factors to be considered and protocols to be implemented to detect the risk of slavery and/or human trafficking taking place anywhere along our supply chains.

4.2. ZeniMax Europe's internal employee policies require all staff to act responsibly,

professionally and ethically and to ensure at all times they are complying with the law, encouraged to report concerns of misconduct and have appropriate sanctions in place for instances of non-compliance.

TRAINING

4.3. ZeniMax Europe provides its staff with training relevant to their respective roles and continues to engage in discussion and address slavery & human trafficking issues through direct dialogue with stakeholders, remaining conscious of future training opportunities for its personnel.

5. FURTHER STEPS

5.1. ZeniMax Europe is satisfied that it is apprised of its obligations under the Act and will continue to give the prevention of slavery and human trafficking importance in its business operations.

This statement on U.K. Modern Slavery Act has been approved by the Board of Directors of ZeniMax Europe Limited.



Benjamin Orndorff
Director, ZeniMax Europe Limited