

2022 Modern Slavery and Human Trafficking Statement

1 March 2023

1. Introduction

Nga mea pai me nga – doing good things with good people – is at the heart of what Vista Group International Limited (**Vista Group**) and its subsidiaries do. Consistent with this goal, Vista Group and its subsidiaries are committed to ethical and sustainable conduct, including taking reasonable steps to identify and address the risk of slavery and human trafficking in their respective operations and supply chains.

2. Purpose

This is our second modern slavery and human trafficking statement and it sets out the steps that Vista Group and its subsidiaries have taken during the financial year ending 31 December 2022 (**FY22**) and will take during the financial year ending 31 December 2023 (**FY23**) to identify potential modern slavery and human trafficking risks related to their businesses and in their supply chains, and to mitigate such risks.

3. Our Operations

Vista Group is a diversified group of companies that provide software, data and technology solutions that span the value chain of the global film industry, from production and distribution to cinema exhibition and the moviegoer. Vista Group includes:

- Vista Cinema (cinema management software for enterprise cinemas) – www.vista.co
- Veezi (cloud-based cinema management software for independent cinemas) – www.veezi.com
- Movio (data analytics and campaign management software for cinemas) – www.movio.co
- Maccs (film distribution software) – www.maccs.com
- Numero (box office reporting for film distributors and cinemas) – www.numero.co
- Powster (creative studio platform) – www.powster.com ; and
- Flicks (a moviegoer facing website and application that provides information about what content to see and where to see it) – www.flicks.co.nz / www.flicks.com.au / www.flicks.co.uk.

4. Structure

Vista Group (the parent company of the Vista Group group of companies) is incorporated in New Zealand and is listed on the New Zealand and Australian stock exchanges under ticker code “VGL”. Vista Group:

- Is the controlling shareholder in companies operating in New Zealand, Australia, the USA, the United Kingdom, the Netherlands, the Republic of South Africa, Malaysia and Romania
- Has other shareholdings in entities operating in the USA, the United Kingdom, Mexico, Brazil and the Peoples Republic of China (minority shareholding)
- Employs over 700 staff across its subsidiaries

5. Supply chain and key risk areas

The main supplier categories for Vista Group and its subsidiaries include technology related goods and services, professional services, property, facilities and facilities-related services, and office consumables. Vista Group and its subsidiaries have not during the course of carrying out the FY22 modern slavery risk assessment and work programme identified or been informed of any allegations of human trafficking / slavery activities against suppliers to Vista Group and/or its subsidiaries, but Vista Group and its subsidiaries commit to conducting ongoing due diligence to investigate key risk areas (including cleaning and services contractors at Vista Group’s key offices, food and beverage suppliers, and IT equipment and office supplies) to ensure appropriate action can be taken to prevent such activities occurring in the supply chains of Vista Group and its subsidiaries by applying the process and policy for managing suppliers with a potentially elevated risk of modern slavery in their supply chain (see further below).

6. Policies and Governance

Code of Ethics: Vista Group has a Code of Ethics which plays a key role in establishing the framework by which Directors and employees of Vista Group and its subsidiaries are expected to conduct themselves. The Code of Ethics sets out guiding principles to facilitate decisions that are consistent with Vista Group’s values, business goals and legal and policy obligations. Directors and employees of Vista Group and its subsidiaries are required to familiarise themselves with the Code of Ethics, as it governs their behaviour while they are engaged or employed by Vista Group or its subsidiaries.

Modern Slavery Policy: Vista Group has adopted a Modern Slavery Policy which provides an overview of the approach Vista Group and its subsidiaries follow in identifying and addressing modern slavery risks in their operations and supply chains. The policy applies to all persons working for or on behalf of Vista Group and its subsidiaries and is available on Vista Group’s website at <https://vistagroup.co.nz/investor-centre>.

Recruitment: Conducting “right to work” checks, to ensure all employees are eligible to work in the country in which their role is located, and to safeguard against individuals being forced to work against their will, is a standard and embedded part of the recruitment processes of Vista Group and its subsidiaries.

7. Actions and progress during FY22

During FY22 we conducted the following exercises as part of our modern slavery risk assessment and work programme:

- **Supplier mapping:** The Tier 1 Suppliers to Vista Group International Limited and Vista Entertainment Solutions (UK) Limited were updated to identify and record any new suppliers engaged during FY22, and the supply chain map was expanded to identify and record Vista Entertainment Solutions Limited's Tier 1 Suppliers, including name, location, category of product / service supplied, and whether those suppliers had published a modern slavery statement.
- **Risk assessment:** The risk assessment criteria we developed in FY21 were applied for identifying whether Tier 1 suppliers presented a low or elevated potential exposure to modern slavery in their supply chains (based on the Global Slavery Index 2018) and applied it to our mapped Tier 1 suppliers.
- **Supplier Modern Slavery Questionnaire:** The Supplier Modern Slavery Questionnaire was rolled out to existing suppliers who presented a potentially elevated exposure to modern slavery in their supply chains.
- **Supplier Code of Conduct:** A Supplier Code of Conduct was developed setting out the minimum standards expected from our suppliers regarding: (i) the protection of human rights; and (ii) fair and ethical work practices.
- **Managing Risk:** A system and policy was developed for managing the suppliers to Vista Group and its subsidiaries that were assessed (using the risk assessment criteria) as having a potentially elevated risk of modern slavery in their supply chain (for example where they were located in a country with a high prevalence of modern slavery and/or if they supplied products and services at high risk of being produced or supplied by forced labour).
- **Training:** A modern slavery awareness training was developed in FY22 for all employees involved in sourcing products and/or services on behalf of Vista Group and/or its subsidiaries to raise awareness of potential modern slavery risks related to the businesses and supply chains of Vista Group and its subsidiaries and how to report such risks. Although it was intended for this to be rolled out all employees engaged in procuring products and services for Vista Group and its subsidiaries in FY22, this was delayed until after a newly acquired learning and management platform has gone live – expected in Q2 FY23.

8. Next steps

Looking ahead to FY23, Vista Group will focus on the following four key areas:

1. **Enhanced Supplier Mapping:** Expanding our supply chain map to identify and record Tier 1 suppliers across additional Vista Group companies, focusing on those located in countries that have a potentially elevated risk of exposure to modern slavery.
2. **Raising Awareness:** Launching a Modern Slavery awareness training and assessment module on the new learning management platform to all existing employees engaged in engaging suppliers and all new employees.
3. **Ongoing due diligence:** Conducting ongoing due diligence on suppliers that have a potentially elevated risk of modern slavery in their supply chains, according to the developed risk assessment criteria.

4. **Enhance modern slavery governance:** Expanding the team dedicated to executing the modern slavery work programme and mitigating modern slavery risk and establishing a regular cadence of reporting to the Executive Leadership Team and the Audit and Risk Committee on progress.

9. Assessing the effectiveness of our actions

To measure and improve the effectiveness of our actions, we have developed the following OKRs:

Objective	Key Result
Enhanced Supplier Mapping	Expand our supply chain map to identify and record Tier 1 suppliers across at least three additional Vista Group companies.
Raising Awareness	All existing employees involved in engaging suppliers and all new employees to complete a Modern Slavery awareness training and assessment module following the launch of the new learning management platform.
Ongoing Due Diligence	All newly mapped Tier 1 suppliers that have a potentially elevated risk of modern slavery in their supply chains to complete the developed Supplier Modern Slavery Questionnaire and acknowledge our Code of Conduct.
Enhance Modern Slavery Governance	Report to the Executive Leadership Team and the Audit and Risk Committee on progress in executing our FY23 modern slavery work programme two times prior to the publication of our FY23 Modern Slavery Statement.

10. Consultation and Approval

This is a joint statement of Vista Group International Limited (NZ company number 1353402), Vista Entertainment Solutions Limited (NZ Company number 817774) and Vista Entertainment Solutions (UK) Limited (UK company number 06028720). It covers the period from 1 January 2022 – 31 December 2022.

Vista Group International Limited is publishing this statement as a reporting entity under Australia's *Modern Slavery Act 2018 (Cth)*.

Vista Group's subsidiaries are not currently required to publish a modern slavery statement in the United Kingdom, but Vista Entertainment Solutions Limited (NZ Company number 817774) and Vista Entertainment Solutions (UK) Limited (UK company number 06028720) have implemented modern slavery risk management within their operations and publish this statement on a voluntary basis.

This joint statement was reviewed by Vista Group's Audit and Risk Committee on behalf of Vista Group International Limited, Vista Entertainment Solutions Limited and Vista Entertainment Solution (UK) Limited, prior to being approved by Vista Group's Board on 28 February 2023.



James Miller

Independent Director and Chair of the Audit and Risk Committee
Vista Group International Limited