

# VGW MODERN SLAVERY STATEMENT 2024





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## INTRODUCTION

This modern slavery statement (**Statement**) is the fifth statement developed in accordance with the requirements of the Australian **Modern Slavery Act 2018** (Cth) (**Act**). It follows on from the fourth statement which was approved and published on the Australian Government's online Modern Slavery Statements Register on 29 February 2024. It outlines further action(s) taken by VGW Holdings Limited (ACN 147 193 511) (**VGW** or **we**) and its wholly owned and controlled entities (referred to collectively as **VGW Group**) to identify, assess and reduce the risk of modern slavery practices in its operations and supply chains during the year ending 30 June 2024.

The VGW Group is committed to identifying and eradicating any modern slavery practices in its operations and supply chains. This Statement, and future statements, will reflect VGW's continuous improvement in its approach to addressing modern slavery risks.



## STRUCTURE AND OPERATIONS

VGW is an Australian public company which operates from and has its registered office in Perth, Western Australia. VGW has subsidiaries in Australia, the United States of America (**US**), Canada and Malta. As of 30 June 2024, VGW Group engaged approximately 1430 personnel.

The VGW Group is an interactive entertainment provider, harnessing technology and creativity to deliver online social games, and its key operating activities comprise:

**Direct employment of personnel:**

The VGW Group employs personnel such as engineers, developers, designers, data analysts, mathematicians, marketing specialists, managers, compliance officers, people and culture advisors, accountants and lawyers across its offices. The recruitment process of VGW Group personnel is predominantly conducted from VGW's offices in Perth, Western Australia, Sydney, New South Wales and Toronto, Canada.

**Provision and delivery of online services:**

The VGW Group offers online social games services and promotions to customers located in certain territories in the US and Canada.

**Research and development:**

Personnel within the VGW Group engage in research and development to produce new offerings and games as well as improve on existing offerings.



## SUPPLY CHAINS

As an interactive entertainment provider, the VGW Group's supply chains consist of the following key categories:

**Consulting:**

Consulting services supplied to the VGW Group include product development and brand and design consultancy services.

**Customer Service:**

Customer services supplied to the VGW Group include responding to customer queries, addressing complaints, troubleshooting issues and complying with anti-fraud and anti-money laundering requirements.

**Finance and tax:**

Financial and tax services supplied to the VGW Group include payroll, auditing and advisory services.

**Legal:**

Legal services supplied to the VGW Group include legal advisory services relating to employment law, intellectual property, marketing and promotions, and branding.

**Marketing:**

Marketing services supplied to the VGW Group include promotional and advertising services.

**Payments:**

Payments services supplied to the VGW Group include the processing of payments and other payment related services.

**Technology:**

The VGW Group procures software to support its operations as well as hardware such as laptops, monitors, computer accessories, conferencing equipment and printers/copiers.

In addition to the above key categories, services such as catering, cleaning, utilities, travel, and production of branded merchandise are also included in the VGW Group's supply chains.



## RISKS OF MODERN SLAVERY PRACTICES

### Direct Operations

Given the industry in which the VGW Group operates (interactive entertainment) and the location of its offices in low-risk jurisdictions (Australia, US, Canada and Malta), our assessment of the risk of modern slavery practices within the VGW Group's direct business operations is low. The VGW Group entities are either directly responsible for their own recruitment of personnel and management of office facilities or obtain support for these functions from VGW.

The engagement of contractors in:

- The Philippines to deliver customer support services; and
- Romania, Hungary, and Poland to work on product development respectively, was identified as a potential issue as these are high to medium risk jurisdictions based on information sourced via the Global Slavery Index.

The risk in respect of contractors in the Philippines is mitigated significantly because they are engaged by the VGW Group entities rather than through a third party. VGW is therefore able to directly monitor the arrangements to ensure that its contractors received fair service fees and are not subject to modern slavery practices.

The VGW Group contractors in Romania, Hungary and Poland are engaged by external third parties based in the respective jurisdictions. There is no indication that Romanian, Hungarian and Polish contractors are subject to modern slavery practices and satisfactory due diligence has been and/or will be undertaken in relation to the respective third party providers.

As VGW Group expands its business, more contractors have been or will be engaged by VGW (or approved third party providers). This will be addressed in the subsequent modern slavery statements.

### Supply Chains

We are of the view that the VGW Group's supply chains are predominantly low risk, considering the industry in which it operates and the nature of the goods and services it procures. However, the potential for modern slavery to exist is recognised, particularly in the VGW Group's extended supply chains and higher risk categories or locations.

The following procurement categories have been identified as having a higher risk of modern slavery:

- Technology infrastructure and hardware.
- Facilities service providers (e.g. cleaning and premises maintenance).
- Merchandise supply chains (e.g. production of branded clothing and other items).



## ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

VGW's commitment in identifying and eradicating modern slavery in its operations and supply chains is reflected in the following initiatives that had been implemented across the VGW Group as at 30 June 2024:

### Implementation of an internal Modern Slavery Working Group

- An internal Modern Slavery Working Group (**MS Working Group**) comprising of relevant personnel from VGW and its wholly owned and controlled entities has been implemented.
- The MS Working Group will:
  - ensure that the modern slavery risks relating to each VGW entity involved have been identified, assessed and addressed; and
  - work together collaboratively in the preparation of VGW's modern slavery statements (including this current Statement).



## ASSESSMENT OF EFFECTIVENESS

VGW is in the process of putting in place a formal modern slavery framework that will enable it to more comprehensively assess and mitigate the risks of modern slavery in the VGW Group's operations and supply chains. We will continue to make further improvements to the VGW Group's processes and procedures in the future.



## CONSULTATION

The relevant personnel in the MS Working Group have the appropriate visibility and authority concerning each VGW wholly owned and controlled entities and they have been notified and consulted with, about the preparation of this Statement. The Statement was distributed for their acknowledgement, review and feedback.



## APPROVAL

This Statement was approved by the board of directors of VGW Holdings Limited on 10 December 2024.

**Laurence Escalante**  
Director  
VGW Holdings Limited

10 December 2024