



Human Trafficking & Modern Slavery Statement 2024

Foreword



At Merlin Entertainments we have a **zero-tolerance** approach to modern slavery of any kind. As such we are committed to conducting business responsibly and will always endeavour to ensure that no modern slavery or human trafficking occurs in the operation of our business across the globe.

We are committed to upholding human rights and also expect all suppliers and contractors, to comply with internationally recognised codes of practice on human rights, employment practices and working conditions.

Part of our core values as a company is based on the respect and care of our people and those that work for and on behalf of Merlin. We will always take decisive action to do the right thing and believe that everyone matters, striving to create our places of work to be safe, inclusive and diverse, and where everyone has the same opportunities and respect.

This statement illustrates our approach to preventing modern slavery at Merlin and in our supply chain for the period ending 31st December 2024. We will continue to do the right thing and operate within a framework of continuous self-assessment and improvement.



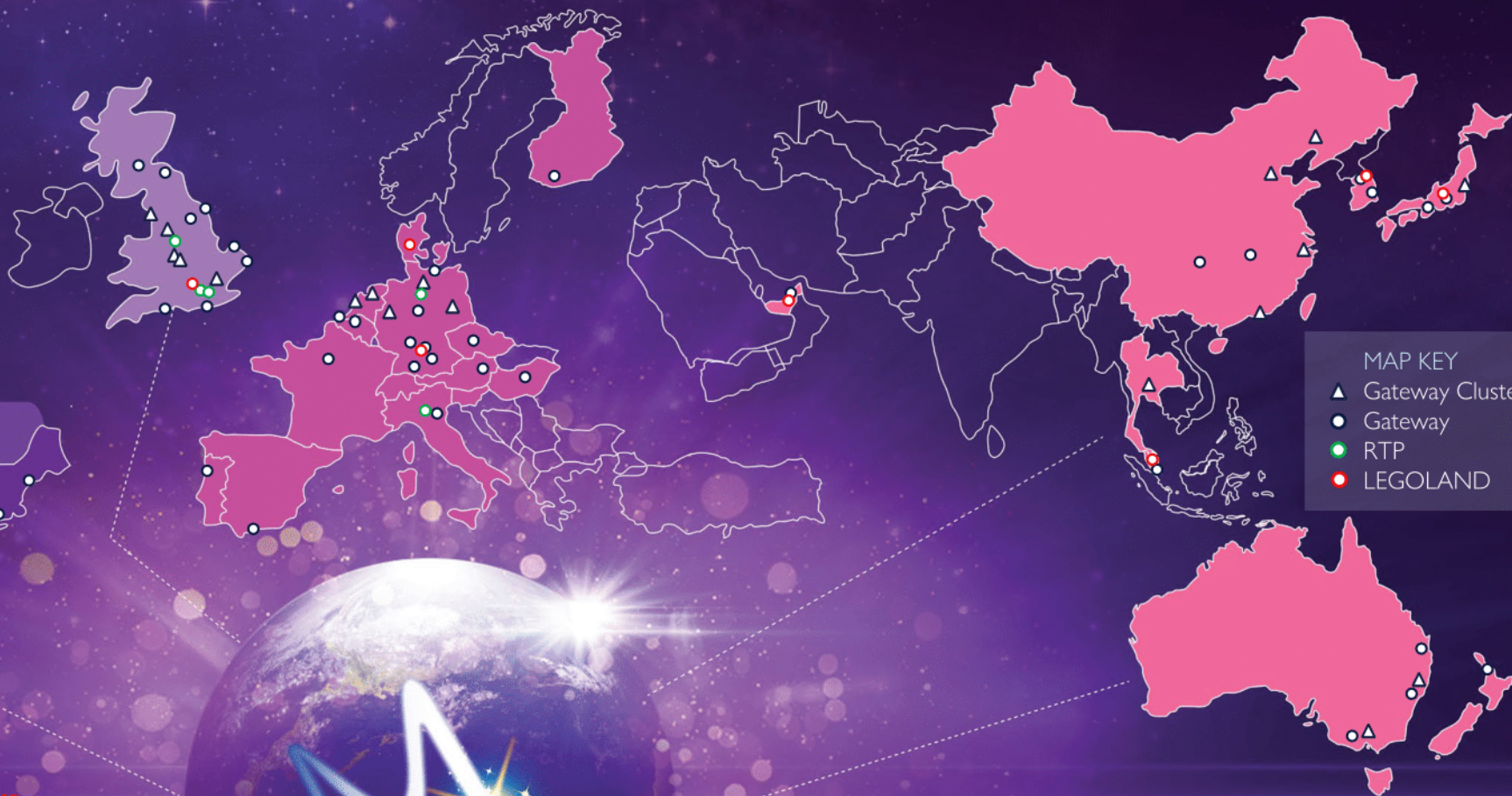
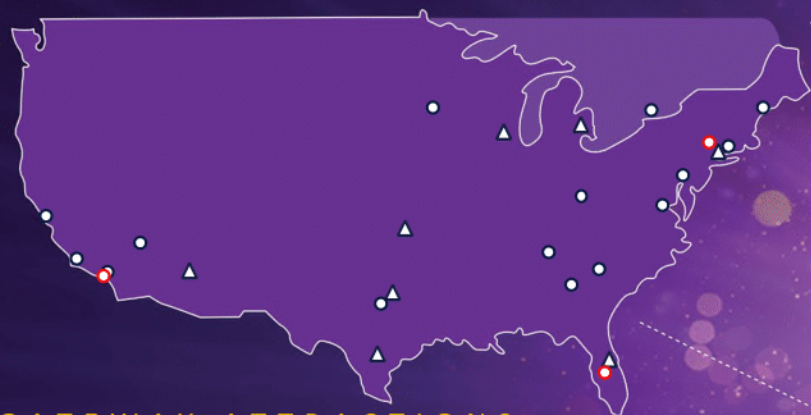
Fiona Eastwood
Chief executive Officer
June 2025

World of Attractions

Merlin Entertainments a world leader in branded entertainment destinations.

Merlin's purpose is to create more memories, bring more joy and spread more happiness to more people in more places than anyone else in the world, by bringing to life iconic entertainment brands like LEGO, Peppa Pig, and many more.

*Attraction figures as of April 2025



MAP KEY

- ▲ Gateway Cluster
- Gateway
- RTP
- LEGOLAND

GATEWAY ATTRACTIONS



Amazing Discoveries
 United Kingdom: 11
 Continental Europe: 14
 North America: 10
 Asia Pacific: 8



Famous Fun
 United Kingdom: 2
 Continental Europe: 6
 North America: 5
 Asia Pacific: 9



Playful Learning
 United Kingdom: 2
 Continental Europe: 3
 North America: 12
 Asia Pacific: 7



Scary Fun
 United Kingdom: 6
 Continental Europe: 3



United Kingdom: 1



United Kingdom: 1



United Kingdom: 1



United Kingdom: 1



United Kingdom: 1



United Kingdom: 1



Laugh, Learn & Play
 North America: 3
 Continental Europe: 1
 Asia Pacific: 1



Snort, Giggle & Play
 North America: 2
 Continental Europe: 1

LEGOLAND RESORTS



Playful Learning
 United Kingdom: 1
 Continental Europe: 3
 North America: 3
 Asia Pacific: 3

RESORT THEME PARKS



Fantastic Escapism
 United Kingdom



Wild Adventure
 United Kingdom



Feel-Good Thrills
 United Kingdom



United Kingdom: 2
 North America: 1
 Asia Pacific: 1



Asia Pacific: 2



Asia Pacific: 1



Continental Europe: 1



North America: 3
 Continental Europe: 1



Ultimate Castle
 United Kingdom: 1



Extraordinary Adventure
 Germany



Big Fantasy Adventure
 Italy



Policies

Merlin is committed to identifying and addressing modern slavery and human trafficking risks in our business and across our supply chains.

As an organisation operating in multiple jurisdictions, we will always comply with local laws and regulations, however where these fall short of our own global standards and policies, we will always aim to go above and beyond local legislation to maintain a high common ethical standard.

Our **Human Rights & Modern Slavery Policy** reflects our commitment to acting ethically and with integrity in our business activities and relationships. We strive to prevent exploitation and discrimination, to value diversity and inclusion throughout our business, and to provide a safe, secure and healthy environment within which to work.

As part of our 'Everyone Matters at Merlin' strategy, we are committed to leading positive change to increase diversity and inclusion within our workforce and better reflect the diversity of our millions of guests.



Policies

Whistleblowing Policy

Merlin encourages all employees to report any concerns relating to unethical business conduct within the direct activities, or supply chains of the Company.

This policy is designed to make it easy for employees to speak up or blow the whistle or make disclosures without fear of retaliation, through use of an independent externally hosted hotline.

This service is available to all employees, temporary workers and agency staff in all languages, regardless of where they are in the world. This service is also available to external consultants and contractors employed to work on behalf of Merlin.

This policy is being relaunched across the Merlin business in 2025 as the Speak Up Policy to drive additional engagement, empowering individuals to speak up and report any wrongdoing.

Employee Code of Conduct

This document illustrates the actions and behaviour expected at all times when representing the Merlin, being clear that breach of any policy will not be tolerated.

All employees are required to formally acknowledge that they have read, understood and will adhere to the contents of the Code of Conduct. Their declaration also serves as formal acknowledgement of all Company policies referred to within the Code including policies that have relevance to modern slavery.

Through the Code of Conduct employees are made fully aware that breach of any policy, or failure to raise concerns, may lead to disciplinary action and may ultimately lead to dismissal.

Activity is underway in 2025 to refresh the Code of Conduct to give all employees access and direction to applicable policies.



Policies

Equal Opportunities Policy

This policy is available to all UK employees and extended to other regions based upon local laws, stating all employees should be treated with dignity, respect and consideration at work and does not discriminate against them because of sex, age, gender reassignment, marital or civil partner status, sexual orientation, disability, race, colour, nationality, religion or belief, ethnic or national origin, maternity or pregnancy.

Merlin aims to treat all employees, former employees, clients, suppliers and members of the public with whom we come into contact, with dignity and respect.

Recruitment Policy and Code of Practice

These global policies uphold the Equal Opportunities and Human Rights policies through ensuring that all candidates are treated with dignity and respect, and that all applications are handled equally.



Policies

Protection of Children and Young Workers

This global policy states our commitment to protecting children and younger workers under the age of 18. It clearly states that Merlin does not tolerate unfair treatment of children or young workers in the workplace and that maximum working hours, working conditions and fair treatment will always be adhered to.

Local risk assessments are carried out before employing young workers, and Merlin takes all measures to ensure that child welfare takes priority over business concerns.

Anti-Bribery and Fraud Policy

The Company has a zero tolerance towards bribery, fraud and other types of corruption. This includes participating in any form of facilitation payment during business dealings.

This policy applies to all employees and in addition, all third parties are required to sign up to Merlin's Ethical Dealing Principles which includes a contractual requirement to comply with applicable anti-bribery legislation.

The anti-bribery and fraud policy is currently being aligned under a wider anti-corruption policy. The roll out is scheduled for Summer 2025 which will be underpinned by a follow-on training programme to reinforce the principles of doing the right thing.



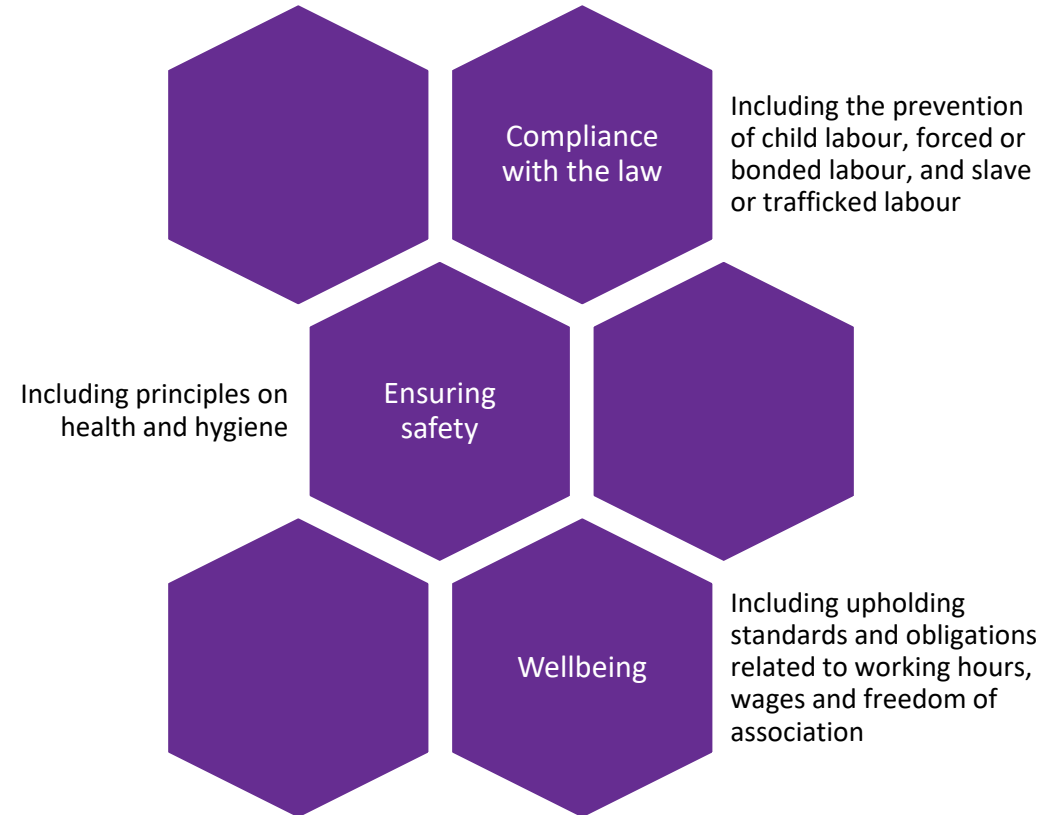
Policies

Retail Merchandise Code of Conduct

This Code of Conduct and the inclusion of sourcing principles establish the standards for commercial retail suppliers working for and on behalf of Merlin.

Merlin expects third parties to comply with internationally recognised practices on Human Rights, employment practices, working conditions and well-being.

The Code specifically requires third parties to achieve and maintain standards in relation to the principles illustrated to the right:





Risks of Modern Slavery Practices

Contract Policy and Risk Profile

It is listed on Merlin's Contract Policy Risk Profile that: *“unethical conduct by Merlin's suppliers and their supply chain could cause guests to lose confidence in Merlin's brands and expose Merlin to significant reputational and financial harm. Unethical conduct could relate to bribery and corruption, money laundering, modern slavery, equal pay, discrimination, child labour, human rights, animal welfare and the environment, and as a business, we only wish to do business with suppliers who share Merlin's values.”*

Therefore, additional approvals are required if third parties do not comply with signing up to Merlin's Ethical Dealing Principles.

Risk Assessment & Consultation Process

For the 2024 Modern Slavery Statement, a broad consultation process was undertaken with entities within the control of Merlin and internal stakeholders such as Procurement, Merlin Magic Making, People, Internal Audit, Legal and Conservation teams globally. This consultation process took the form of interactive workshops where the outputs contributed to the up issue of a risk assessment that focussed on:

- Any perceived, ongoing and new risks across the business;
- Any geographic risk or influence;
- Whether there are any vulnerable groups at risk within the dealings;
- The type of products or services being supplied;
- The controls or mitigations in place;
- The residual risk post application of the controls; and
- Work that is needed to reduce the risk further (see slide 13 for more detail)

Conducting the consultation process allowed all entities and stakeholders to take a collaborative approach in understanding and quantifying any risks within the business associated to Modern Slavery.

This group continues to meet on a quarterly basis to bring together the different entities and stakeholders to ensure a broad review continues to occur and is chaired by the Group Compliance Director.

The Supply Chain

As our supply chain is global in nature, we regularly work with local and national, as well as international, business partners. Merlin will not knowingly do business with any parties who do not comply with applicable laws and regulations, including local, environmental and employment laws.

Unless a higher or equivalent standard is applied, suppliers are required to agree, as a condition of doing business with Merlin, that Merlin's Ethical Dealing Principles will apply (see Contract Policy & Risk Profile). Any requests to move away from this principle of doing business must be escalated to senior management

Our Ethical Dealing Principles require suppliers to be compliant with international conventions in relation to forced labour; freedom of association; the right to organise and collective bargaining; equal remuneration; abolition of forced labour; discrimination; minimum age and child labour; the European Convention on Human Rights and European Money Laundering Convention. They also require suppliers to be compliant with applicable legislation in relation to bribery and modern slavery.

Third parties providing certain construction related goods and/or services to Merlin Magic Making are also required to participate in a due diligence and tender process and, if successful, agree to Merlin's standard framework agreement or another appropriate contract template before they are admitted to the Preferred Suppliers List. This is all in addition to agreeing to Merlin's Ethical Dealing Principles.

The Supply Chain continued

Merlin has several systems in place to identify and assess potential risks in our supply chain, as well as mitigating touch risks and protect those who speak up. These include:

- Binding third parties to ethical dealing principles within our contractual terms and conditions;
- Holding regular review meetings with major commercial suppliers and brand partners which focus on the delivery of goods and services in line with the terms of our agreement;
- Invoking strict sanctions on suppliers who do not meet our performance expectations or uphold the terms of our agreement (for example, any evidence of child labour results in the immediate delisting of a supplier)
- use of an independent externally hosted Speak Up/Whistleblowing Hotline which all employees, workers and external consultants/contractors working on behalf of Merlin have access to and are encouraged to use whenever appropriate (all reports are directed to the Legal Director, Business Ethics & Compliance)

Furthermore, Merlin continually reviews its policies and procedures based on lessons learnt from the above initiatives and other business developments to proactively maintain an informed approach to preventing modern slavery in our society.

Training

All employees who have been determined as at-risk of potentially encountering modern slavery as part of their role, for example those regularly involved in the procurement of goods and services, are provided with the Ethical Dealing Principles as a tool to use with their third parties.

In addition, modern slavery training content is being refreshed and will be deployed in Q3 2025. The training will focus on:

- Geographical risk and how that changes depending on where we operate;
- Identification and mitigations of risks included in the modern slavery risk assessment;
- How to identify modern slavery in the workplace especially high-volume employment sectors such as accommodation, food and beverage operations and large capital development projects;
- how to report concerns appropriately and Speak Up; and
- As our business expands, being mindful of the increased risks relating to modern slavery associated with new market entry

Effectiveness / Performance Review



Merlin understands that modern slavery risks continually evolve and will remain vigilant regarding issues in our supply chains.

We will always comply with local legislation and adopt global standards in the way we work with our people and third parties.

In addition, we continue to monitor the performance of our measures to detect and prevent modern slavery in our supply chains through an annual risk assessment workshop and continuous monitoring our plans.

During 2024, the following was completed as part of the continuous improvement plan:

- Recruitment of a new Compliance Director whose remit is to include the management and oversight of Merlin's international approach to modern slavery prevention, as well as enabling compliance with all relevant legal and regulatory obligations
- Completion of a review of Merlin's current anti-bribery and corruption policies and procedures, to ensure that they are as robust as possible
- Conducted a Modern Slavery risk assessment workshop with internal stakeholders and agreed a plan of action for 2025.

For 2025, the Modern Slavery compliance action plan includes:

- Deliver training to employees identified as at-risk of potential encountering modern slavery as part of their role
- Launch a new employee Code of Conduct
- Review the Retail merchandising internal audit programme to identify potential expansion into other risk areas, i.e. Construction and Conservation, Welfare & Education
- Review the Retail Merchandise Code of Conduct for third parties
- Review questionnaires issued at the procurement tender stage to identify risks and concerns related to Modern Slavery



This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and section 14 of the Australian Modern Slavery Act 2018. It constitutes our modern slavery statement for the financial year ending 31 December 2024. This is a Group statement which covers the subsidiaries that apply to the disclosure criteria of the UK Act, namely Merlin Attractions Operations Limited and Merlin Entertainments (SEA LIFE) Limited. In respect of the Australian Act, it also covers Merlin Entertainments (Australia) Pty Ltd. This report was approved by the Board of Directors of Merlin Entertainments Limited on 30th June 2025 in its capacity as the principal governing body of each reporting entity.

This report is signed by:
Craig Leversha – Director Merlin Entertainments (Australia) Pty Ltd

Signed by:

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