



MODERN SLAVERY ACT 2015 STATEMENT

MODERN SLAVERY STATEMENT 2019/2020

GuestTek Interactive Entertainment Ltd is publishing this statement in compliance with Section 54 of the Modern Slavery Act 2015.

ORGANISATIONAL RESPONSIBILITY

Organisational Structure

GuestTek™ is a global leader in broadband technology and interactive solutions for the hospitality industry. Since 1997, we have partnered with hotels to maximize your property's offerings—enhancing your brand, helping you generate more revenue and giving you total confidence, you're delivering a world-class guest experience.

With operations reaching 85 countries and serving more than 3900 hotels, we understand your most critical requirements. Whether it's an individual property, franchised or corporate location, GuestTek allows you to customize each solution to your property's needs. And GuestTek's focus on hospitality means we fully understand and deliver on the technology needs of today's guests, while engineering the in-room technologies desired by tomorrow's guests, too.

GuestTek has experienced significant worldwide growth with the 2014 acquisition of iBAHN & TelNet and the creation in 2015 of a subsidiary, Event Conference Services (ECS). We continue to seek opportunities that expand our capacity to serve more global clients and offer the best in hospitality technology. Our continuous commitment to our clients means we at GuestTek align ourselves with leading providers around the world of satellite and cable television to provide better offerings to your guests, helping them to feel just a little more at home

Responsibility

We recognise that although slavery, servitude, forced labour and human trafficking ('Modern Slavery'), is illegal it remains a growing issue worldwide. In an increasingly global marketplace, we also recognise that all businesses have a responsibility to understand whether modern slavery and human trafficking is taking place within their businesses and supply chains and this is a responsibility we take seriously.

We are committed to making meaningful and long-term improvements to workers' employment and workplace conditions including but not limited to the prevention of forced, bonded and trafficked labour. We do this through our policies and governance, which are supported by a committed organisation and our leadership.

We also recognise that the industry can be at a higher risk of exposure to Modern Slavery for the following reasons:

- having staff across the globe
- having a diverse supply chain.



MODERN SLAVERY ACT 2015 STATEMENT

SUPPLY CHAIN

We procure goods and services globally directly from manufacturers or their approved resellers.

We have contractual relationships with all of our suppliers and a dedicated procurement department to oversee the instruction of major supplier agreements and ensure that adequate procedures are in place.

We employ the majority of our workforce directly; we also subcontract labour resource through due diligence and stringent contracts as per our Supplier Management Process.

OUR POLICIES

We recognise that effective policies are crucial for combatting Modern Slavery. We have an Anti-slavery and Human Trafficking Policy in place that sets out our overall approach to Modern Slavery at GuestTek. We are committed to ensuring we are not supplied by anyone who engages in human trafficking and modern slavery.

Our Recruitment Policy is followed to ensure, as far as possible, that migrant workers are not exposed to exploitation and that the business is not exposed to the fraudulent recruitment of employees.

Human Resources has overall responsibility for our Modern Slavery policies.

RISK MONITORING AND COMPLIANCE

In 2019/2020 we continued to address risks of Modern Slavery in our business and in our supply chain and we have:

- Continued to monitor our first-tier risk suppliers to identify any new suppliers that fall within an area that is at high risk of Modern Slavery, and we have continued to address Modern Slavery with these suppliers by requesting copies of their policies and procedures and carrying out audits. Continued to address Modern Slavery as a formal business risk and consider further ways that it can be successfully addressed.
- Continued to monitor and ensure that our Recruitment policy is followed with strict compliance through our IMS Quarterly Review Meetings.

STEPS TAKEN IN 2018 / 2019

In 2018 / 2019 we have taken the following steps:

- Implemented a supplier code of conduct with a particular focus on areas that are more susceptible to Modern Slavery.
- IMS Quarterly Review assessing the risks from suppliers, employees and any other areas which could be affected by Modern Slavery
- Continued to monitor our recruitment process considering Modern Slavery as a risk.
- Created a successful data capture process (as part of GDPR) to allow us to secure data and provide it to the authorities in potential cases of Modern Slavery.

During 2019 / 2020 we will:

- Develop an Ethical Trade Policy that is in line with our values on Modern Slavery.
- Implement online training for all employees to allow them to understand that Modern Slavery is a risk
- Provide employees with a central contact email to report any concerns about Modern Slavery within the business. This central contact email is monitored by HR to ensure reporting is sufficient for the Gangmasters and Labour Abuse Authority (GLAA).



MODERN SLAVERY ACT 2015 STATEMENT

CEO APPROVAL

This statement has been approved by the CEO of GuestTek Interactive Entertainment Ltd.

And is signed by Ivonne Prugnaud Managing Director EMEA

(Signature on File)

.....

Ivonne Prugnaud

MD EMEA