

27th June 2024

BMG Rights Management (UK) Limited (“**we**” or “**us**” or “**our**”) is a company incorporated in England and Wales with registered number 06705101 whose registered office is situated at 8th Floor, 5 Merchant Square, London, W2 1AS.

Introduction

We are a music company engaged in acquiring, licensing and marketing recordings and songs by artists and authors, via all forms of media, including in physical and digital formats. We operate a wide range of business activities including, among other things, the production, manufacture, distribution, marketing and licensing of recorded music, as well as the licensing of compositions and recordings. Some of these activities are managed through affiliates, distributors, licensees, joint venture partnerships and third-party service companies.

Organisation

We are the UK operation of BMG, the international music division of global media, services and education corporation, Bertelsmann. We are owned by Bertelsmann UK Limited, which is in turn owned by Bertelsmann SE & Co KGaA.

Our policies on slavery and human trafficking

We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to improving our practices to combat slavery and human trafficking and have taken the following steps:

(i) Employees and Training

We continue to adopt the Bertelsmann Code of Conduct which sets out the principles of all Bertelsmann companies (including us) and which employees are obligated to adhere to. Those principles include respect for human rights and the protection of health and environment, both of our employees and of third parties with whom we have business relations. It also sets out the various reporting channels available (including via our internal Speakup system which is available in multiple languages and accessible by phone or internet) to report any concerns.

All new employees are required to undertake and complete an online training course to ensure they understand the Code of Conduct contents and agree to comply with its terms. In addition, in 2023 all employees were required to undertake the Code of Conduct refresher training to ensure that they continue to understand and comply with its terms.

Within the last six months, employees with specific responsibilities for engaging suppliers attended training provided by a third-party UK charity working to end modern slavery. The aim of the training was to ensure that our employees were fully aware of the issues surrounding modern slavery and to reinforce the need for vigilance in this area.

(ii) Supply Chain Review

We also adhere to the Bertelsmann Supplier Code of Conduct which sets out the mandatory minimum requirements for our business partners (including, among others, our suppliers, distributors and sales partners). These requirements reiterate the importance for responsible and ethical behaviour towards employees, business partners, society and the environment, in addition to complying with the law in the course of our business activities.

We continue to distribute the Bertelsmann Supplier Code of Conduct and continue to review our business, our supply chains and our partners to ensure our values are upheld. More recently we have introduced a “Modern Slavery Questionnaire” which will be sent to our manufacturers to help identify and monitor the risk of slavery and human trafficking in our supply chain.

We also continue to engage various representatives across different departments within BMG UK to discuss our practices, identify any additional training that is required and offer colleagues the opportunity to highlight any potential risks. To date we have no evidence that our supply chain is not complying with our standard minimum requirements set out in the Bertelsmann Supplier Code of Conduct.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31st December 2023.

A handwritten signature in blue ink, appearing to read 'Alistair Norbury', is positioned above a horizontal dotted line.

Alistair Norbury

President, BMG UK

Date: 27th June 2024