

PREVENTING MODERN SLAVERY STATEMENT 2018/19

Summary:

Click Entertainment is committed to ensuring that human trafficking, forced labour and other forms of slavery play no role within our business or supply chains. To satisfy this responsibility, we have and will continue to promote and expect the application of high legal, ethical, environmental and employee-related standards within our own business and perform checks on our supply chains, making sure that all stakeholders (including employees, partners and suppliers) are working together to achieve this common goal.

Introduction

Click Entertainment is committed to eradicating modern slavery in all areas of its business and supply chain. As part of this we look at how we can run our business according to our values. We want to be confident that people who are contributing to our success are not subject to any form of human rights abuse, including that of modern slavery or human trafficking. This statement has been prepared pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) in respect of our financial year 2018/ 2019 It sets out the steps we will now take to prevent modern slavery taking place in any part of our business and our supply chains. We will update this statement following the completion of each subsequent financial year to identify the steps we implemented to tackle modern slavery.

Statement

Click Entertainment is a limited liability company incorporated in England & Wales is majority owned by Dangaard A/S. Click Entertainment is part of the Dangaard Group and in turn part of the Fleggard Group of Companies who are controlled by Fleggard Holding A/S.

Fleggard Holding coordinate the group and promote cooperation and high standards, including our “best in class” values, mission and vision. Click Entertainment employs approximately 50 staff, the entire Fleggard Group employ over 1700 employees in a range of different organisations engaged in a variety of different business activities.

Click Entertainment is a leading distributor of video games, consoles and accessories. We trade across the world with retailers, resellers and distributors. Our employees are split into 3 teams, our client facing Sales and Purchasing Team, Warehouse and Logistics who store and process our physical and digital stock and Accounts and Administration who support businesses activities. Our financial year runs from October to September.

Our Employee Handbook, contract and business policies and processes set out and ensure that we all have an ethical and behavioural framework that reflect our values. It includes a responsibility to speak up when we experience any behaviour that is not in accordance with our Code of Conduct. This includes the responsibility to highlight any evidence or cases (suspected or otherwise) of human rights abuse, including that of modern slavery.

Although our industry is deemed to be low risk, the trading nature of our business with both small and large companies in over 100 countries can make it difficult to investigate every trading partner with resources that we have. However we undertake due diligence checks on our suppliers.

In conducting these checks we expect all suppliers to meet legal, ethical and employment related standards. Suppliers are required to comply fully with all laws and regulations applicable to them and must ensure that they and their subcontractors and suppliers respect the rights of their employees and comply with all relevant legislation, regulations and directives in the country or countries in which they operate. We also ask all suppliers to confirm whether their organisation or any affiliated entity does not use any child labour, forced labour or human trafficking and that all of your employees are legally employed and where needed ask for policies or processes as evidence.

Click Entertainment's Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Our HR Manager, Head of Accounts, Sales Manager, Operations and Distribution Manager and Purchasing Manager have the day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, Our HR Manager is tasked with dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering and highlighting modern slavery.

Update at end of financial year 2017/18

We took various steps throughout the course of the year to detect, monitor and prevent modern slavery in all areas of our business. This involved:

- Identifying areas of business and geographical locations of our business that are at higher risk of modern slavery
- Investigating our suppliers and customers through due diligence checks as well as visits to our biggest customer's business locations
- Obtaining business references
- Promoting our whistle blowing policy to encourage staff to report concerns
- Training our staff in what modern slavery and human rights abuses are and what this means in terms of our business activities as "Act" and how to spot signs of modern slavery
- Working with UK and international official authorities to ensure that we are using best practice and are aware of the latest advice.

We are pleased to state that we did not find any signs or cases of Modern Slavery or human rights abuses but continue to monitor to ensure that we maintain vigilance.



Jake Wright
Chief Commercial Officer
Click Entertainment Ltd

