

Double Eleven Limited Slavery and human trafficking statement for the purposes of section 54 of the Modern Slavery Act 2015 (MSA)

Introduction from Kimberley Turner, Co-CEO

It continues to be a priority for Double Eleven to ensure that we trade ethically, source responsibly and are committed to improving our practices to prevent and combat modern slavery and human trafficking throughout our organisation, and in particular within our supply chain.

1. Organisation's structure, its business and supply chains

We are a full-service video games developer and publisher, working on some of the biggest IPs in the world, alongside some of the biggest companies in the world. We have a very diverse workforce spanning two continents with our headquarters based in Middlesbrough, England and a studio located in Kuala Lumpur, Malaysia. We operate across multiple markets and work with a broad network of suppliers and business partners as part of our wider supply chain.

We are part of the Pneuma Group of companies (Group), and our ultimate parent company is Pneuma Group Limited (Pneuma). Pneuma has its head office at Central Point 202-206 Linthorpe Road, Middlesbrough, England TS1 3QW. This is geographically close to our own head office address of Boho X, Gosford Street, Middlesbrough, England, TS2 1BB.

We have approximately 400 employees worldwide and operate in England and Malaysia.

Organisation and supply chain structure

Our business

Our business operations are run by the Board of Directors alongside a very capable senior leadership team. Each project we work on operates under that structure, however is internally reported as a separate business unit, each with a project director further supported by the projects leadership team. We then have further core teams supporting project delivery, those being our people and culture team, finance, IT, communications and systems development.

Supply chain understanding

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

Our supply chains

Our supply chains are, to the extent that we are reasonably able to audit the same, known to us, and include organisations who work as our subcontractors and component providers for the work that we undertake for third parties.

Our service providers

In addition to supply chain members, our business relationships also include engaging with organisations that deliver services to our buildings and staff, for example, catering and cleaning services within our Headquarters building. We also bring into the scope of this initiative those organisations for whom we work.

We maintain an up-to-date record of all such organisations that deliver these services, or for whom we work, and the terms upon which we engage with them. We ensure that those terms include the necessary commitments from these organisations to tackle modern slavery within their own organisations and supply chains.

Modern slavery risk management governance

We ensure that we have identified named individuals and specific departments within our organisation to be responsible for our modern slavery risk management. These responsibilities are clearly understood to be part of their personal contractual responsibilities to our organisation.

Information gathering for the statement

We gather appropriate information from our supply chain to support our compliance with the Modern Slavery Act and to assess suppliers' approaches to modern slavery and human rights. Depending on the nature, size and risk profile of the supplier, this may include requiring completion of an annual compliance declaration against our Supplier Code of Conduct, or reviewing and relying on the supplier's own published modern slavery statements, policies and other relevant information where these provide sufficient assurance. Where information or assurance is not considered sufficient, we will seek further clarification or evidence as appropriate.

Stakeholder engagement to increase supply chain knowledge

Notwithstanding the fact that we acknowledge the practical limits to what we feel we can achieve within the tiers of the supply chain that sit below those organisations that we deal with directly, we will seek to engage with external stakeholders and to use appropriate due diligence to improve our knowledge of operations and supply chains with whom we deal as a business.

2. Our policies on slavery and human trafficking

We have in place appropriate policies and supplier codes of conduct that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We update these policies and codes on a continuous basis to reflect changing laws and regulations, lived experience, peer group learning and stakeholder input.

Internal operating policy

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls aiming to ensure slavery and human trafficking is not taking place in our supply chains. The policy is continuously monitored by our Group Legal Counsel, who updates it in line with changing laws and best practice.

Our Modern Slavery Policy is communicated and made available to our staff to promote awareness of modern slavery and the importance of raising any concerns. Staff are encouraged to report any suspected instances or concerns through the appropriate internal channels so that these can be investigated and addressed.

Links to international standards

Our Supplier's Code of Conduct contains the following commitment:

The Supplier will comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of its supply chain.

Our Group Legal Counsel monitors developments in international law and standards on a continuous basis, so that necessary updates and amendments can be made to the Code and communicated to the supply chain.

Wider engagement on modern slavery policies

We currently engage with other members of our Group to share experience and learning, to inform both the development and implementation of modern slavery policies and effective business practices to identify and mitigate the impact of modern slavery. We will seek to widen this learning to other stakeholders, going forward.

Communication and enforcement of policies

We aim to communicate and enforce policies and codes within the organisation and, where appropriate, across our supply chain by:

- Making our Modern Slavery Policy available to existing staff (including temporary staff, directors and apprentices and interns) and communicating relevant information to support awareness of modern slavery and how concerns can be raised;
- Making new staff (including temporary staff, directors and apprentices and interns) aware of relevant company policies, including our Modern Slavery Policy, as part of our onboarding and induction arrangements;
- Taking a proportionate approach to supplier due diligence, which may include providing suppliers with our Supplier Code of Conduct and seeking confirmation of compliance, or reviewing a supplier's own published modern slavery statements, policies and standards where these provide appropriate assurance; and
- Where appropriate, incorporating relevant obligations relating to modern slavery, ethical conduct and compliance with applicable laws into contractual arrangements with suppliers and other organisations with whom we do business.

3. Due diligence processes for slavery and human trafficking

We acknowledge that the effectiveness of a process for identifying, preventing and mitigating slavery and human trafficking diminishes the further that it goes from our own organisation. We appreciate that any process that we seek to impose will be constrained, in particular, by:

- Individual human rights;
- Confidentiality obligations;
- Data protection considerations; and
- The willingness of supply chain members to participate positively.

Nonetheless, we remain committed to developing a process that, whilst respecting these constraints, is as effective as we can reasonably achieve in identifying and addressing the problem in other organisations.

In this regard, we currently seek certification from all our main supply chain members, those who provide services to us and the organisations for whom we work, in each case that they comply either with the terms of our Modern Slavery Policy and Supplier's Code of Conduct, or with their own comparable terms that they themselves already observe. We have diligently collated responses from these organisations, and the majority have responded positively by certifying compliance. None have certified non-compliance, and those who have not yet responded are being pursued.

Prevention and mitigation

This is our first annual Statement, and we acknowledge that our own current process operates on the basis of a contractual obligations-based framework, together with certification of compliance by our suppliers and clients. This process does not yet require our own organisation, and the organisations that provide services to us, those for whom we work, and those within our supply chain, to evidence how working within the requirements of this framework has contributed to preventing and mitigating modern slavery within the organisation or its supply chain.

In this respect, we regard our process as not yet being fully mature in its ability to identify incidences of modern slavery within our own and other organisations, and how our efforts are having a positive impact on addressing it. We would expect to enhance it by a more intrusive due diligence process to measure the effectiveness of our initiative in preventing and mitigating modern slavery.

Supplier and worker engagement

As has been explained, we believe that we have a good level of visibility within our own organisation, but (acknowledging the constraints referred to) less visibility outside of it. Our current due diligence within Double Eleven would be expected to identify incidences of modern slavery, but our visibility within the wider supply chain is more limited. Our approach currently relies primarily on information provided by suppliers, including

compliance declarations and, where appropriate, their own published statements and policies.

In terms of due diligence, where we are and where we would like to be can be summarised as follows:

- We communicate our Modern Slavery Policy to staff, including how concerns should be reported, and provide a whistleblowing arrangement to ensure that concerns can be raised safely
- In this respect, our own organisation has a solid due diligence process to identify and report modern slavery incidents, but does not yet have actions, programmes and initiatives to learn from these incidents. As is stated below in this section of the Statement, no such incidents have yet been reported, but we aim to begin developing actions, programmes and initiatives based on incidents that have been reported outside of our organisations
- So far as the organisations that provide services to us or work within our supply chain are concerned, we do not yet routinely require them to explain how they have gathered the information to be able to certify compliance with our policy and code, and how they have recorded and addressed any incidents, and learned from them
- Therefore, we will develop a due diligence system that seeks to address these shortcomings, whilst acknowledging the constraints that are identified above when dealing with an external organisation.

Incidents of modern slavery

Our due diligence programmes and processes in relation to slavery and human trafficking implemented in our business and supply chains have not highlighted any incidents of modern slavery taking place within them during the past year, but we remain vigilant and realistic.

As has been stated above, we will develop a more intrusive due diligence process that gives us better assurance that compliance certification is true and accurate. If we encounter any incidence of modern slavery within either our own organisation or those we deal with going forward, we will develop an approach that faces up to it positively, prioritising addressing and learning from it above blaming and seeking accountability for it.

Stakeholder engagement and learning for due diligence programmes

We have acknowledged that there are constraints associated with due diligence relating to our supply chain members and service providers, but that we must be prepared to go further to ensure that these constraints do not render our process inaccurate or capable of evasion. As part of developing the due diligence programmes and processes in relation to slavery and human trafficking referred to above, we will explore opportunities to obtain information from other stakeholders and wider industry sources, and participate in peer-learning groups for sharing lessons learned and best practice.

4. Identifying, assessing and managing the risk of slavery and human trafficking

In addition to the enhanced due diligence process to be developed in accordance with the previous Section of this Statement, which is by its nature reactive, we will reflect upon how we can embed a proactive risk assessment within the processes we use when making decisions about engaging with businesses, or considering how business is undertaken. The aim would be to include a risk assessment of the likelihood of modern slavery being encountered with an organisation with whom we intend to do business, or in the way that we intend to carry out business ourselves, before that business or practice is engaged.

As has been explained in Section 1, we have named individuals and specific departments within the organisation to be responsible for our modern slavery risk management. An important example would be those officers who are responsible for procuring services to be provided to our organisation.

Our current risk assessment of the issue is intuitive and informal, but going forward we will develop a risk assessment that effectively identifies the risk of modern slavery taking place in existing and new business relationships and practices, and either avoids altogether or mitigates to a satisfactory extent, the likelihood of it occurring.

Identifying and assessing risks

We will aim to use a variety of different sources for identifying and assessing our organisation's overall modern slavery risk. This would be expected to draw upon:

- Desk-based research;
- Publicly-available statistics;

- Engagement with industry stakeholders; and
- Requiring suppliers to complete questionnaires before engaging with them.

Highest priority risks to workers

The risk assessment would aim to identify the highest priority modern slavery risks to workers within our business and supply chains.

Meaningful use of the risk assessment

Once the risk assessment has been undertaken, and the highest priority risks to workers identified, in each case in relation to the existing and new business relationships and practices, we will give sufficient weight to its mitigation, or - if relevant – avoidance, in our decision as to whether to go ahead or continue.

As an example, we have undertaken this process, albeit informally, when considering to undertake a significant new business relationship during the course of the last year, and elected not to do so. Although not entirely on modern slavery grounds, it was a material consideration.

As has stated above, this informal process will be formalised and embedded in our purchase ordering, procurement and business practice processes.

5. Monitoring and evaluation: our effectiveness in combating slavery and human trafficking

This is our first annual Statement. We are not yet at the stage to set out our anti-slavery goals (MSA Goals) which aim to improve our ability to identify, prevent, mitigate and respond more effectively to modern slavery risks in our business and supply chains. However, this is an issue that we will address in forthcoming years, based on the learning from previous incidents encountered, and peer-group and stakeholder learning and engagement. We would expect future versions of this Statement to identify our MSA Goals for the forthcoming year.

Success stories of monitoring and evaluation

We would also intend to identify in our annual Statements going forward examples of the success of our monitoring and evaluation processes in combatting modern slavery risk.

6. Training

The final aim of this Statement is to acknowledge the importance of our people, and the staff of the organisations with whom we work. They are the eyes and ears, the decision-makers, and the difference between paying lip service to the issue or being effective. To support understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have taken initial steps to raise awareness among our staff. We also encourage our business partners to take appropriate steps to raise awareness of modern slavery risks within their own organisations and supply chains.

Internal and external training

Training and Awareness

During this reporting period, Double Eleven has taken initial steps to raise staff awareness of modern slavery risks, rather than delivering formal, structured training. This has included internal written communications to all employees covering:

- What modern slavery is and the forms it can take (including forced labour and human trafficking);
- The signs and indicators employees should be aware of, both within our own business and in our wider supply chain;
- How to raise a concern, including the appropriate internal reporting routes.

This communication was issued alongside our first Modern Slavery Policy, which all employees are required to confirm they have read and understood. This sign-off process is designed to ensure a baseline level of awareness and accountability across the business, and to reinforce individual responsibility for identifying and escalating concerns.

We recognise that formal training is a valuable next step in strengthening staff capability to identify and respond to modern slavery risks, and we plan to introduce structured training as part of our ongoing commitment to continuous improvement in this area. We will report on progress against this in future statements

Supply Chain Due Diligence

Alongside communicating our expectations internally, we have written to our suppliers to share our Code of Conduct, setting out our commitment to preventing modern slavery and the standards we expect them to uphold in their own operations. We will

work to embed meaningful due diligence as to how those organisations train and raise awareness within their own workforces, and require them to demonstrate that they are committed to doing so.

Training programme materials

We use a variety of materials to raise awareness of modern slavery, including internal written communications and our Modern Slavery Policy.

Training package development

We are focused on developing our training programme by:

- Continuing to raise awareness of modern slavery risks among our staff;
- Inviting feedback where appropriate from staff and other stakeholders;
- Seeking to learn from approaches used by other organisations; and
- Continuing to review how our supply chain members and service providers address modern slavery risks within their own organisations.

Summary

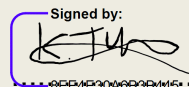
Although this is our first MSA Statement, we are proud of the efforts and achievements that have been made so far in addressing the impact of modern slavery within our own organisation, and within those who work with us. We have a well-developed framework to identify the businesses we work with and the terms of their engagement, and we have taken initial steps to raise awareness among our own staff through our Modern Slavery Policy and supporting communications. We also have processes in place to address concerns or non-compliance involving third parties or our own staff.

The next stage of our journey is to develop:

- a due diligence process that enables us to gain assurance from our third-party business relationships that incidents of modern slavery are being identified, reported and actioned, and that suitable training is being given to their workforce; and
- a risk awareness process that enables us to identify the likelihood and seriousness of modern slavery occurring in any business or practice that we intend to engage in, with meaningful consideration being given to identified risks when deciding whether to engage and, if so, on what terms.

We hope to demonstrate our progress in next year's Statement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 September 2026. It was approved by the Board on 28th September 2026.

Signed by:


28 September 2026 | 11:35:46 BST

Kimberley Turner CO-CEO

Double Eleven Limited

Date: 28th September 2026.