



Modern Slavery Act 2015 Statement – Gram Games Limited

Gram Games Limited is an entertainment company delivering engaging social games for the mobile world, and creating real bonds through play. At Gram Games, we have one goal and one passion: to have fun, and to turn that fun into top-notch games played by hundreds of millions of players around the world. We believe that a great team is a product of raw talent and a great working environment. We value open communication; constant data-driven iteration and innovation; pushing our teams to collaborate and learn from each other; and working hard in a fun, creative, and comfortable environment. This is how we've built a top-notch team that brings great games to the world.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “MSA”) and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019. We set out the steps taken by Gram Games Limited to ensure that slavery and human trafficking is not occurring in our business or supply chains.

Our Structure and Our Business

Gram Games Limited is a wholly owned indirect subsidiary of Zynga Inc., a company incorporated in the United States. The principal activity of Gram Games Limited is developing and publishing video games for use on mobile devices. These games have covered a range of genres, including strategy and puzzle.

Gram Games Limited develops its games at a studio in London. Gram Games Limited provides services related to the research and development of mobile and social games for smartphones, tablets, and other connected devices. These services are provided to its ultimate parent company, Zynga Inc. The average monthly number of staff for the year ended 31 December 2019 was 48.

Policies and Procedures

Gram Games Limited is committed to strengthening its practices in order to deter, detect and counter any modern slavery or human trafficking in any part of its business or its supply chain. Gram Games Limited acknowledges that its greatest strength is its employees, and accordingly has implemented certain policies and procedures. Key policies are reviewed at least annually and are circulated annually to employees.

Gram Games Limited has recruitment procedures that include pre-employment screening of all staff to ensure they have the right to work in the UK.

Our Code of Business Conduct and Ethics sets out the commitment of Gram Games Limited to fair treatment and a respectful workplace. We also have a Workplace Violence Policy. Everyone who works at Gram Games Limited must act responsibly, professionally and ethically and follow the law. Our Code of Business Conduct and Ethics also requires people to report suspected misconduct or illegal activity, and sets out that employees should feel comfortable doing so without fear of retaliation. Such reports, or reports about human rights violations, should be made to a manager, anyone in an individual's reporting chain, or a member of Human Resources or Legal staff. Gram Games Limited runs a reporting hotline, available via phone or email or online, and a conduct helpline, available via phone or email.

Any employee who does not follow the Code of Business Conduct and Ethics could be subject to disciplinary proceedings, including termination of employment.

Due Diligence

Gram Games Limited selects goods and materials from preferred vendors of record, with reassessment of these vendors carried out over time. Gram Games Limited also screens potential vendors for compliance with applicable laws, including the MSA. Agreements with third parties must also be in writing and signed, and includes appropriate language requiring compliance with applicable laws, including the MSA. All vendor and supplier procurement agreements are reviewed and authorised by the Finance/Procurement department, and meetings are held with business representatives to ensure compliance with contractual terms.

Gram Games Limited has carried out a risk assessment and believes that there is a low risk of slavery or human trafficking in its supply chain. The company interacts with suppliers from around the world, in numerous countries, including jurisdictions such as India, Turkey, and Ireland (countries with a medium risk of modern slavery according to the Global Slavery Index). These suppliers provide the company with services and resources related to game operations, IT and marketing and user acquisition. The nature of these services means that we consider ourselves to be at low risk, making generally no use of unskilled labour. If a suspicion does arise that a supplier is involved in activities related to modern slavery or human trafficking, Gram Games Limited will carry out an investigation and take prompt remedial action where necessary.

Training


All employees of Gram Games Limited are given training on the Code of Business Conduct and Ethics when they join the company, and are also required to participate in refresher compliance training every 18 months. This training includes UK-specific anti-bribery and corruption.

Further Steps

The majority of Gram Games' suppliers are long-term (greater than one year). We conduct an annual survey of all vendors, as well as periodic assessments. Gram Games Limited may (and has) taken appropriate remedies as a result of such assessments. Gram Games Limited will continue to monitor its policies, procedures and relationships with third parties to ensure ongoing compliance.

This Modern Slavery Act Statement has been approved by the Board of Directors of Gram Games Limited.

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Director of Gram Games Limited