

Modern Slavery Statement of The Raine Group LLC 2021

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (as amended) (the “Act”) and outlines steps that The Raine Group LLC and its affiliates (“Raine”) have taken to ensure that modern slavery or human trafficking is not taking place within our business operations or supply chain. Raine maintains a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to acting according to the highest standards of ethical behavior in our business activities and to ensuring there are no instances of modern slavery or human trafficking in any part of our operations or supply chain. We seek to work with suppliers who meet the same strict standards and who share our values.

Our Business

Raine provides advisory and investment services to institutional clients and investments. For further information about our business please visit our website: <https://www.raine.com/>.

Risk Assessment

Raine recognizes its responsibility to identify and address modern slavery issues that are linked to our business activities. We have assessed the risk of modern slavery and human trafficking to be low in the highly regulated financial services industry. Raine further recognizes our responsibilities extend to our supply chain. Raine has a limited supply chain given the nature of our business streams, which are all within financial services. The main suppliers to the business are professional services firms (including legal, accounting and audit), recruitment agencies, office space providers, suppliers of financial and related data, general information and analyses on companies and securities, companies that provide office supply services (including cleaning and security), computer and telecommunications hardware and software services, and any other relevant service required to operate a financial services office environment (e.g. stationery, food and drink for employees) and utilities. Whilst Raine has not identified any aspects of our business or supply chain that present an elevated risk of modern slavery, we are committed to ensuring that our business and supply chain are free of modern slavery. Raine will periodically assess and manage the risk of slavery and human trafficking taking place in our businesses and supply chain. We will not knowingly engage in or support any business that is involved with modern slavery. We have adopted policies and processes designed to mitigate any risk that may exist.

Our Policies and Processes

Raine’s Code of Ethics enshrines Raine’s commitment to ensure that its business is conducted according to the highest standards of ethical conduct and according to all applicable laws and regulations. Raine employees have access to Raine’s internal Whistleblowing Policy and may report or raise any concerns, warnings, or suspected unethical behavior including in respect of modern slavery or human trafficking. We also operate a number of related policies and procedures that support our commitment to sustainable business practices and respect for human rights, including our equal opportunities and diversity initiatives. In addition, our recruitment and privacy

policies ensure we only recruit those lawfully permitted to work, and that we retain and process personal data relating to our partners and employees in compliance with applicable laws.

Employee Awareness

Raine's Code of Ethics is available to Raine employees and sets out our zero-tolerance approach to any instance of modern slavery and human trafficking.

Approval of this Statement

This statement was approved by the Board of Directors of The Raine Group LLC.



Alfred Chianese, General Counsel

On behalf of the Board of Directors of The Raine Group LLC