

## **Modern Slavery Statement 2023**

This is the modern slavery statement issued pursuant to Section 54(1) of the Modern Slavery Act 2015 for Spotify Limited in respect of the financial year ending [31 December 2022/3].

### **Introduction and organisational structure**

Founded in Sweden in 2006, Spotify is a leading audio streaming service. The Spotify service is now available in over 180 territories worldwide. The company makes a range of content available, such as music, podcasts and audiobooks. The content available on the Spotify platform includes content from third party rights holders. Our UK business was fully launched in February 2009. We now have over 1000 employees in the UK, working out of our office in London as well as remotely in the UK through our Work From Anywhere Policy. Spotify Limited is a UK registered company and a subsidiary of Spotify AB, which is a Swedish entity. [More information is available at: <https://newsroom.spotify.com/company-info/>]

### **Policies**

We are committed to treating everyone in our business and supply chain with dignity and respect. Spotify is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labour and all other trafficking-related activities (together, “human trafficking”). We strictly prohibit human trafficking and the use of involuntary labour in our business.

### **Supply chain**

We procure many different products and services from a variety of suppliers. Our supply chains currently relate mainly to the following activities: digital content; IT infrastructure; customer services; marketing and advertising.

We have our Supplier Code of Conduct (the “**SCoC**”) published [here](#). Our SCoC defines the basic requirements expected of our suppliers and third-party intermediaries concerning their responsibilities towards their stakeholders including respect for human rights.

### **Own business**

As an online content platform, where most of our workers are employed directly by our organisation, we consider our own business to be at low risk.

All staff are required to comply with our Code of Conduct, which among other things, prohibits violations of law, including labour and employment laws. In addition, Spotify has policies and compliance procedures for pay transparency and for preventing and addressing discrimination and harassment. We provide a number of channels for staff to report any concerns or potential violations of our policies and compliance procedures, including an anonymous whistleblowing channel.

## **Management of suppliers and third parties**

We are working to encourage all third parties engaged by our business to be mindful of, and compliant with ethical practices. Our SCoC mandates that all our suppliers, vendors, and any third-party intermediaries must respect the human rights of their employees. This includes refusing to employ or compel anyone to work against their will, providing fair remuneration, guaranteeing compliance with the applicable national statutory minimum wage, adhering to the maximum number of working hours as stipulated in relevant laws, and ensuring that the workplace and working conditions are healthy and safe for all workers, both from a physical and psychological perspective. The SCoC prohibits suppliers from employing workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Minimum Age Convention, under the age of 14. We also provide a number of channels for third parties to report any concerns or potential violations of policies and compliance procedures, including an anonymous whistleblowing channel.

In the UK in particular we are taking steps to make specific reference to human trafficking and slavery laws in commercial agreements to require partners to comply with anti-human trafficking and slavery legislation.

## **Training**

Spotify Limited has training for employees to ensure compliance with our policies including our Code of Conduct and Ethics and our Anti-Discrimination and Anti-Harassment Policy.

This statement is Spotify Limited's Slavery and Human Trafficking Statement as required under The Modern Slavery Act 2015. This statement was approved by the board of directors of Spotify on 17 October 2023. This statement will be reviewed and updated regularly to reflect changes in the company's operations, policies, and strategies.

**T. Connaughton**

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Thomas Connaughton, Director  
Spotify Limited  
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