

Modern Slavery Statement 2018

Introduction and organisational structure

Founded in Sweden in 2006, Spotify is a leading music and podcast streaming service. We make a range of content available, including from third party rights holders. Our service is present in over 75 territories across the world. We offer two streaming experiences: a paid subscription service that enables listening without ad interruptions and an ad-supported experience. Our UK business was fully launched in February 2009 and we now have employees working out of offices in London and Cambridge. Spotify Limited is a UK registered company and a subsidiary of Spotify AB.

Supply chain

We are committed to treating everyone in our business and supply chain with the dignity and respect they deserve. We procure many different products and services from a variety of suppliers. Our supply chains currently relate mainly to the following activities: licensed digital content; IT infrastructure; customer services; marketing and advertising.

Throughout our supply chains, we are committed to high ethical standards, promoting safe and fair working conditions and responsible management of environmental and social issues. We believe we have a responsibility and opportunity to encourage sustainable business practices as well as inclusion and diversity among our many suppliers.

Modern slavery

Spotify is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labour and all other trafficking-related activities (together, "human trafficking"). As an online content platform, where most of our workers are employed directly by our organisation, we consider ourselves to be at low risk. We strictly prohibit human trafficking and the use of involuntary labour in our business and work to eliminate any human trafficking from our supply chains.

Our position is well-known internally and is explicitly stipulated in our internal handbook and enforced through audits. All personnel are required to comply with our handbook, which, among other things, prohibits violations of law, including labour and employment laws. In addition to the handbook, Spotify's policies and compliance procedures with respect to workforce education on labour standards, pay transparency, hours of work and harassment are designed to mitigate the risk of human trafficking in our business. Our staff may report any violations of, or activity inconsistent with, our policies and compliance procedures pursuant to the Spotify Whistleblower and Complaint Policy.



Management of third parties

We are working to encourage all third parties engaged by our business to be mindful of, and compliant with, ethical practices. In the UK in particular we are taking steps to make specific reference to human trafficking and slavery laws in agreements to remind partners that they should also comply with anti-human trafficking and slavery legislation where relevant.

Training

Spotify Limited has training for members of staff to ensure compliance with our policies against human trafficking in our business and our supply chains.

This statement is Spotify Limited's Slavery and Human Trafficking Statement as required under the Modern Slavery Act 2015.

Thomas Connaughton, Director

Spotify Limited

15 July 2019