



The following statement is written in accordance with the requirements under Section 54 of the Modern Slavery Act 2015 and is applicable to the GVC Group (including its subsidiary companies) (hereafter “GVC” or “the Group”) which are listed on pages 170-176 of the [2019 Annual Report](#). The statement sets out the Group’s activities and measures taken between 1st January and 31st December 2019 to prevent modern slavery and human trafficking occurring within our own operations and extended supply chain.

Modern Slavery and Human Trafficking Transparency Statement 2020

Introduction

We aim to meet the highest standards in everything we do, from the way we run our business and manage our financial affairs, to how we support our people, customers and communities. We take our legal responsibilities seriously as well as our duty to act honestly, openly and with integrity.

Our Code of Conduct sets out 10 guiding principles that we require all our colleagues, suppliers and partners to adhere to:

- 1.** We take all allegations of malpractice and misconduct seriously and will deal with individuals’ concerns confidentially and sensitively
- 2.** We do our best to resolve all work-related issues fairly and quickly
- 3.** We are committed to helping our customers gamble responsibly
- 4.** We abide by the highest standards of financial conduct and will never tolerate bribery, money laundering, conflicts of interest, tipping off, anti-competitive practices or unauthorised share dealing
- 5.** We don't discriminate on the basis of age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage / civil partnership
- 6.** We promote equality, diversity and inclusion in all our working practices
- 7.** We act with tolerance and empathy. There is no place in our company for bullying, harassment, victimisation, violence, threats of violence or abuse of any kind
- 8.** We are committed to providing a safe working environment that promotes our people’s safety, health and wellbeing
- 9.** We make every effort to protect personal information relating to our employees, customers and suppliers

10. We work hard to reduce our environmental impact as a business and make it as easy as we can for our colleagues to do the same

Ultimately, our success and our reputation depend on how we conduct ourselves both as individuals and as a business. We can only deliver short and long-term returns for our shareholders if our business is founded on principles of integrity and fair play.

Our Business

We are one of the world's largest sports-betting and gaming groups, operating in the digital and retail sectors. Incorporated in the Isle of Man, we hold licences in over 20 jurisdictions and employ more than 24,000 in 20 locations, across five continents.

Headcount as at 30 September 2020

Country	Sep '20
Australia	458
Austria	503
Belgium	276
Bulgaria	423
India	2,049
Italy	376
Philippines	1,043
Uruguay	188
USA	133
Gibraltar	1,045
Ireland	796
UK (Retail & Stadia)	15,162
UK (All Other)	1,540
Other	213
Grand Total	24,205

NB: Other represents countries in which we have fewer than 1% of our people

We are proud to own a comprehensive portfolio of established betting and gaming brands including; bwin, Coral, Crystalbet, Eurobet, Ladbrokes, Neds International, Sportingbet; CasinoClub, Foxy Bingo, Gala, Gioco Digitale, partypoker and PartyCasino. In the US, we own and service BetMGM, our joint venture with MGM Resorts International.

We own our proprietary technology across all of our core product verticals and in addition to B2C operations, we provide services to third-party customers on a B2B basis.

Our Approach to Modern Slavery

We believe that our Business and Operating model carries intrinsically low risk in the area of Modern Slavery, however we recognise that people becoming enslaved is a key issue across the globe and within some of the countries in which we operate. We agree with the findings of the UK Government that modern slavery and human trafficking are an outrage and something that society must eradicate. According to the International Labour Organisation, almost 25 million people are estimated to be trapped in forced labour; 16

million of whom are exploited in the private sector. We take this issue seriously and prohibit all forms of slavery, both in our own operations and within our extended supply chains.

Within our higher risk locations, our Senior Leaders will conduct sessions that increase awareness. Whilst our people are predominantly professional and highly skilled, we believe that by creating an opportunity that provides an open and transparent platform for discussion of the issues, we can build wider understanding in each country.

Our approach is guided and reinforced by our Code of Conduct which was renewed and relaunched to all our people in 2018.

Our People

Our people are directly employed wherever possible and we maintain strict controls to ensure that both permanent and contracted staff have the legal right to work within their location. We minimise use of temporary labour in our c3000 shops and offices wherever possible and have made efforts in recent years to insource activity which may be at higher risk (e.g. cleaning).

As well as being part of GVC's core Code of Conduct – a mandatory component of our onboarding and induction process for all employees – we have in place a standalone Modern Slavery Policy, available on our intranet sites and covering all Global Group employees.

Our policy sets out the importance of the issue, provides a clear definition of how to recognise modern slavery, employee obligations in respect of anti-slavery and the process to report any suspicious behaviours. All colleagues are required to complete an e-learning module to ensure they have read and understood our Code of Conduct and are asked to renew this training every year to ensure these important issues remain at the centre of how we operate.

We encourage and support two-way communication between our people and Senior Management through regular formal and informal colleague forums. In addition we conduct an annual global engagement survey. Over the next year our engagement surveys and colleague forums will increase in frequency and will provide another important opportunity to listen to our colleagues' feedback. Modern Slavery will feature as an agenda item in our forums in 2021 to further widen our awareness of this key issue.

Training

All our people are asked to complete our Code of Conduct training which includes sections on Modern Slavery. This module raises awareness of this important issue and covers how colleagues can confidentially raise concerns through our whistleblowing process or the usual grievance routes. Colleagues are reminded that they are fully supported to raise legitimate concerns and will never be penalised for reporting something which they

genuinely believe to be wrong.

In 2020 (to September) 70% of colleagues have completed the training. In 2021 we aim to achieve >80% and will continue to raise awareness through other channels including our Intranet site and 'Town Hall' sessions hosted by Senior Leaders.

Our Anti-Slavery Obligations

All GVC colleagues, particularly those responsible for recruitment, together with anybody working for us, providing services to us or working on our behalf across GVC's global operations, must:

- Not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily or under threat of penalty;
- Comply with the minimum age requirements prescribed by applicable laws;
- Compensate workers with wages and benefits that meet or exceed the legally required minimum for that country;
- Abide by applicable laws concerning the maximum hours of daily labour;
- Take reasonable steps to ensure that any sub-contractors or suppliers from whom they source goods and/or services for ultimate use by GVC adhere to these requirements; and
- Bring any actual or potential cases of modern slavery immediately for further investigation using our Speak Out (Whistleblowing) procedure.

Our Supply Chain

Effectively communicating who we are and how we conduct business is of paramount importance to us. In 2020 we published our Supplier Policy providing for the standards, principles and policies that laying out what we expect from everyone who does business with us.¹

In addition, GVC implemented a common set of policies and procedures in 2019 following the acquisition of the Ladbrokes Coral Group in 2018 in relation to procurement engagement guidelines, fair treatment of suppliers and risk management supported by a significant ERP (Enterprise Resource Planning) transformation onto a single IT platform enabling unified core business processes.

We strongly encourage suppliers to exceed the requirements of this policy and promote

¹ Wherever "supplier" is referenced under this policy, it is deemed to include a supplier's subcontractors, employees and/or consultants.

best practice and continuous improvement throughout their operations. In relation to Human Rights, Modern Slavery and Ethical best practice the GVC Supplier Policy makes it explicitly clear our expectations across the following areas:

- Child Labour
- Forced Labour
- Wages and Benefits
- Working Hours
- Confidentiality
- Freedom of Movement
- Freedom of Association
- Bribery
- Anti-Money Laundering

Conflicts of Interest

In addition to our publicly available Supplier Policy, our internal processes, procedures and policies help us identify risk. New supplier checks are conducted before we transact regardless of spend. These checks include financial status via Dun & Bradstreet, company background, company registration, corporate social responsibility and tax.

We continue to map supplier locations against the Walk Free Foundation Global Slavery Index (GSI) to identify suppliers in high risk countries for Modern Slavery and where applicable based on risk, size and strategic alignment we enter into a commercial and contractual relationship ensuring we have an agreed set of terms and conditions setting out how we wish to trade, pricing, delivery timelines, data protection, security compliance, ethical standards and behaviours in accordance with relevant laws and jurisdictions.

Each time we issue a purchase order, our standard terms and conditions are attached which also refer to our ethical standards across Corporate Social Responsibility.

The Procurement Lifecycle

Since the acquisition of the Ladbrokes Coral Group our Procurement function has implemented a common set of processes, tools and policies that govern the way we source, review, assess and engage with our suppliers:

- We ensure we clearly capture the needs of the business
- We competitively tender such need
- We evaluate, clarify and negotiate
- We contract manage
- We exit and service transfer when such relationships come to an end

Throughout our process we have the appropriate review mechanisms to highlight and manage risk in relation to delivery of products or services, data protection, security compliance, technical compliance and our CSR standards.

We reserve the right within our Terms and Conditions to conduct supplier audits at any time and any company found to have breached our policies or a company that has refused to cooperate with an audit of its employment or recruitment practices may have its supply

agreement or other contract with us terminated immediately. We will also notify the relevant authorities as appropriate.

Regular communication and interactions with our suppliers are key in ensuring where applicable we see and evidence the working environment and practices they trade within. The C19 pandemic has severely limited such physical reviews however we have mobilised and put in place key supplier reviews by use of video conferencing technology ensuring that commercial and contractual obligations are met in accordance with our fair and ethical standards.

Monitoring and assessment

The GVC Code of Conduct and Modern Slavery Policy clearly set out our expectations: that all employees and suppliers act in a proactive, legal and ethical manner at all times.

GVC may perform scheduled and unscheduled audits. Any company found to have breached this policy or a company that has refused to cooperate with an audit of its employment or recruitment practices may have its supply agreement or other contract with us terminated immediately. We will also notify the relevant authorities as appropriate.

In addition to any ad-hoc audits, Modern Slavery features within our Corporate Risk Register and as such is reviewed regularly by the Group Risk Committee. At Board level, the CSR committee provide oversight to ensure that the Group is following its stated aims in this regard.

Internal Policies

We have a number of Global policies relevant to in this regard. These policies include:

- Modern Slavery Policy
- Code of Conduct
- Speak Out Policy
- Grievance Policy

This statement was approved by the Board of Directors of GVC on the 9th November 2020 and will be reviewed annually. It is available on our website at: www.gvc-plc.com.



Shay Segev
Chief Executive Officer