



## **BETFRED GROUP MODERN SLAVERY ACT STATEMENT**

### **Introduction**

Responsible business behaviour has always been a priority for companies within the Betfred Group. We are a highly regulated betting and gaming business, and our integrity is built into the way we do business. We set high standards in treating all our employees and customers with respect and expect similar high standards from our business partners, and our suppliers.

The Modern Slavery Act 2015 requires UK companies to promote ethical business practices and policies that protect workers from being abused and exploited in their own organisations or global supply chains. The Act specifically requires all businesses with annual revenues of over £36 million to publish a statement setting out the steps they have taken to ensure there is no modern slavery in our own business or supply chain.

This statement has been prepared in accordance with section 54(6) of the UK Modern Slavery Act 2015 for the year commencing 1<sup>st</sup> April 2023.

### **Our Organisation**

This statement applies to all companies within and associated to the Betfred Group.

### **Betfred organisational structure**

Betfred Group is privately-owned and the operating companies within the Group operate high Street and multi-channel betting and gaming businesses. We operate over 1350 licenced betting shops across England, Wales, and Scotland under the Betfred brand.

Through multiple channels, we have a growing online presence with a digital sports betting and gaming offering, mostly based in Gibraltar.

We employ just under 10,000 people across the Betfred Group. Colleagues working in our shops are graded Shop Manager, Deputy Manager, Assistant Manager, Sales Cashier and Cleaner. Our UK retail structure consists of 2 divisions, North and South, with a Divisional Manager in each reporting to the UK Head of Retail Operations. Within each division, there is also a Senior Area Manager, reporting to the Divisional Manager. Across the 2 divisions, there are 24 areas, each with an Area Manager, Area Supervisor, Area Operations Assistant and Area Administrator. Due to the strict regulated nature of our businesses, all our shop-based colleagues must be over 18 years of age.

In addition to shop-based teams, we have over 350 colleagues based in our Head Office in Birchwood, Warrington and additional UK offices in Central Manchester and Media City, Salford. Our online business headquarters is located in Gibraltar, and we have now also expanded our operations into the USA and South Africa. As a Group, we will ensure the ethos and commitment to zero tolerance to Modern Slavery is embedded in all our operating companies with each Group company adopting the required and tailored policies relevant to its local operations and jurisdictions and as far as possible reflecting the aims set out in this Group statement.

### **Assessment of modern slavery risk**

As we are an entertainment business, selling experiences rather than physical products, our workforce is highly trained due to the unique nature of our business against other retailers and the technical and highly regulated nature of our offering. We have a relatively small supply chain compared to other high street retail businesses and this is largely characterised by the purchase of data rights, software and premises licences, IT and technology, telecoms, communications, marketing, and professional services.

The Betfred Group is cognisant of the continuing risks, impacts and costs of global slavery and human trafficking and fully supports both the original principles of the Modern Slavery Act and the guidance first published in 2017. The Betfred Group maintains a zero-tolerance approach to slavery and trafficking in all its forms, in any parts of its business or supply chains which remain materially 'low risk'.

We have taken and will continue to take steps to ensure such practices do not take place in our business or anyone who supplies goods and services to us and will keep the issue under review on an annual basis and respond accordingly. Advice, guidance and where applicable, training will be provided to those within the company who have responsibility for checking and monitoring supply chains and our intention is to refresh this training annually.

### **Working Practices**

As part of the Betfred Group's commitment to a zero-tolerance approach to slavery in all forms, we recognise and fully adhere to the Ethical Trade Initiatives Base Code and ensure these principles are embedded throughout our business:

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Wages and benefits paid meet the minimum, national legal standards, or industry benchmark standards.
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.

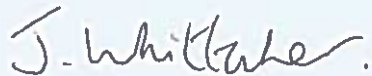
We aim to promote equality, inclusion and diversity in our workforce which is reflected in our associated company policy. We also ensure these principles are embedded when undertaking any recruitment. We do not employ anyone on a casual or non-contractual basis and the majority of our recruitment is done directly and in-house. All new and existing colleagues undergo stringent checks on their eligibility to work in the UK, and original right to work documents are checked and verified by recruiters. We also have an ongoing process of conducting follow-up checks on any visas with time limited restrictions.

Betfred also have a Whistleblowing Policy and procedure through which colleagues can raise concerns in confidence if they recognise any wrongdoing within the Company such as modern slavery. The policy sets out the definitions of disclosures and the procedures of how to report concerns either internally or externally without detriment to the colleague.

### **Our future Commitments**

Betfred Group is committed to maintain a zero-tolerance approach to modern slavery and human trafficking. We will continue to review and update our Modern Slavery Act statement every year in line with our obligations and continue to develop our policies to ensure our approach is commensurate with our risk profile. We will make this statement available to view by all our staff, not just the ones involved in engaging with suppliers, and will look to expand the scope of the training and awareness in 2023 and beyond to ensure we reach a broader range of relevant colleagues.

This statement has been approved by the Betfred Group board of directors and is signed by our Chief Executive Officer on their behalf.



Joanne Whittaker  
Chief Executive Officer  
Betfred Group  
1<sup>st</sup> April 2023