



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 1st April 2024.

Our Organisation

This statement applies to all companies within and associated with 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 Retail Director. 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 strictly 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 400 colleagues based in our Head Office in Birchwood, Warrington and over 300 located in our 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

At Betfred, we recognise that our workforce is integral to delivering exceptional customer service as an entertainment business focused on selling experiences rather than physical products. Our employees undergo rigorous training to ensure they are equipped to navigate the unique nature of our industry, characterised by highly regulated offerings and specialised technical requirements.

While our supply chain may be smaller than traditional retail businesses, it is crucially important. We procure various goods and services, including data rights, software licenses, IT infrastructure, telecoms, marketing services, and professional expertise. We understand the potential risks associated with global supply chains and remain committed to upholding the principles outlined in the Modern Slavery Act of 2015 and subsequent guidance.

The Betfred Group maintains a zero-tolerance approach towards slavery and human trafficking in all its forms. We continually assess and mitigate risks within our business operations and supply chains to ensure compliance with our ethical standards. As part of our commitment to ethical procurement, we require all suppliers to adhere to our Supplier Code of Conduct.

We expect our suppliers to prioritise the well-being and safety of their workers, uphold high ethical standards in their business practices, minimise their environmental footprint, and actively engage in collaborative efforts to promote positive social impacts.

Collaboration and transparency are fundamental to our approach, and we work closely with our suppliers to foster a culture of responsibility and accountability throughout our supply chain.

We are committed to reviewing our practices annually and adapting our approach as needed to uphold our pledge against modern slavery and human trafficking. Our goal is to ensure compliance with legal requirements and actively contribute to eradicating these unacceptable practices from our industry and beyond.

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 known as 'speak up' and where 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.

Training

We provide annual training to our employees to raise awareness of modern slavery and human trafficking issues. This training equips our staff with the knowledge and tools necessary to identify, report, and address any instances of exploitation or abuse.

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,

Betfred believes that transparency and accountability are fundamental to eradicating modern slavery and human trafficking. This statement reflects our ongoing commitment to upholding human rights and ethical standards across our operations and supply chains.

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
1st April 2024