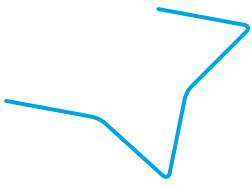


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CAMELOT

ANTI-SLAVERY
AND
HUMAN
TRAFFICKING
STATEMENT

This statement was updated July 2018



INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the anti-slavery and human trafficking statement of Camelot UK Lotteries Limited for the financial year ending April 2018. It reviews the commitments made in the previous anti-slavery and human trafficking statement, the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains and sets out our commitments for the next year to combat slavery and human trafficking in our business and supply chain.

Camelot UK Lotteries Limited (CUKL) has been the licensed operator of The National Lottery since its launch in 1994. The current (Third) Licence commenced in February 2009 and, as a result of an extension, now runs until 31st January 2023.

The overarching objective of CUKL is to maximise returns to National Lottery Good Causes through selling lottery products in an efficient and socially responsible way. This involves creating, marketing and promoting new games, developing and running the lottery infrastructure, providing services for players and winners, and working in partnership with retailers. CUKL has no involvement in the allocation of Good Causes' funding, which is the specific responsibility of 12 lottery distribution bodies, each with specialist knowledge of their sectors.

In operating The National Lottery, CUKL delivers, on average, around £30 million each week to National Lottery Good Causes. Combined with the Lottery Duty it pays to the Government, CUKL returns one of the highest percentages of lottery revenue back to society in the world. To date, National Lottery players have helped to raise over £37 billion for Good Cause projects, with more than 525,000 individual awards made across the UK – an average of over 185 lottery grants in every community.

CUKL is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

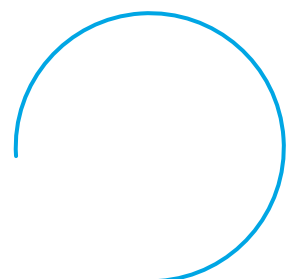
OUR SUPPLY CHAIN

In 2017/18, CUKL worked with around 700 suppliers. The majority of our spend with suppliers is associated with IT and marketing. Our suppliers are managed on a daily basis by CUKL's Relationship Managers who are in turn supported by our Group Procurement team.

The role of the Group Procurement team is to provide professional and proactive procurement support and advice, as required, to help meet the business needs in terms of supplier choice, cost and risk management.

Our suppliers are chosen based on the following criteria;

- Quality, completeness and scalability of the service
- Management systems, processes and flexibility
- Relevant service experience and track record
- Diversity, sustainability, environmental and social considerations
- Risk transfer and management
- Cost and value for money



CUKL undertakes appropriate due diligence in respect of its supply chains. We do so when considering taking on new suppliers, when reviewing existing suppliers through periodic review meetings, annual supplier surveys and audits to ensure that our standards are being implemented, and to ensure that relevant legislation and regulations are complied with.

Our annual supplier conduct review survey is sent to approximately 25 suppliers. The suppliers that are chosen each year are selected based on the perceived risk they pose to CUKL. The survey covers business ethics, supply chain management and human rights, together with broader corporate governance issues.

The survey questions are reviewed each year and will in future include a question addressing the suppliers' approach to preventing and monitoring risks in modern slavery and human trafficking.

CUKL assesses any instances of potential non-compliance or concern on a case by-case basis. We will only trade with suppliers, contractors and sub-contractors that fully comply with our policies, or those who are taking verifiable steps towards compliance.

NATIONAL LOTTERY RETAILERS

Our retail estate of around 46,000 National Lottery retailers accounts for around 80% of CUKL sales, with independent outlets making up the majority of our retail estate. All of our retailers enter into to a National Lottery Retailer Agreement which outlines the high standards expected of them, including obligations designed to ensure that they maintain the reputation, integrity and security of The National Lottery, and that they comply with all applicable laws and regulations.

Looking back

Last year we made a commitment to communicate with all of our National Lottery Retailers about our intention to prevent modern slavery and human trafficking within our supply chain. We communicated this through an article in our National Lottery retailer magazine known as 'Jackpot', which was sent to all of our retailers. The article outlined what modern slavery is, how to report any instances of modern slavery and CUKL's commitment to combating modern slavery, including providing a link to CUKL's Anti-Slavery and Human Trafficking Statement.

Looking forward

Over the next year, we will continue to communicate with our National Lottery Retailers and work with our Retailer forum to explore how we can further raise awareness of modern slavery.

POLICIES AND INFORMATION

Whistleblowing Policy

We encourage CUKL staff and National Lottery suppliers, including their subcontractors and staff, to report any concerns where the interests of others including r The National Lottery, may be at risk. This forms part of our Whistleblowing Policy which encourages CUKL staff and National Lottery suppliers and their subcontractors and staff, to assist CUKL in tackling any fraud, corruption, unlawful conduct or other malpractice which may occur within either our organisation or that of our suppliers.

Part of CUKL's strategy is to provide a way for concerns about malpractice to be raised in confidence. We comply with The Public Interest Disclosure Act 1998 (PIDA) and the guidance it provides for dealing with whistleblowing issues in a safe and constructive way.

Looking back

Although National Lottery suppliers are under an obligation to comply with all relevant legislation (including The Modern Slavery Act 2015), in order to raise awareness and make CUKL's position clear, we have updated our Whistleblowing Policy to specifically include modern slavery as an example of malpractice. Any concerns will be reviewed, escalated and thoroughly investigated.

Last year we committed to communicating with staff and suppliers of The National Lottery to inform them of our commitments and expectations of them, in order to prevent instances of modern slavery and human trafficking. For staff, we did this through our internal intranet system - highlighting CUKL's anti-slavery and human trafficking statement itself - and a news article to bring to life what this means for CUKL employees. We also emailed all of our current suppliers to advise them of our position by bringing CUKL's statement to their attention.

Looking forward

We plan to communicate with all of our directly engaged suppliers to better understand who their subcontractors are and to emphasise our expectations with regard to anti-slavery and human trafficking. We will do this through a survey, collecting information to understand who Camelot's "tier one" suppliers' subcontractors are, what services they are performing, and what due diligence they perform.

CODE OF CONDUCT

The purpose of our Code of Conduct is to affirm our strong dedication to the highest standards of business conduct. It applies to all CUKL staff and it details the actions and behaviour expected when representing CUKL. This also links to our Whistleblowing policy. National Lottery suppliers are under an obligation to impose a Code of Conduct for their business, using ours as a minimum requirement.

Customers

We also encourage our customers to contact us if they have seen anything that represents a potential concern – this is outlined in our Players' Guide which is available online and in-store. The message is also detailed on the back of all National Lottery tickets and Scratchcards.

TRAINING

It is important that all relevant staff are appropriately trained and kept up-to-date regarding the risks of modern slavery in our business and supply chains.

Looking back

Last year we committed to provide training for relevant staff to ensure they are up to-date with best practice and are taking appropriate action to monitor and prevent any instances of modern slavery or human trafficking. It is now compulsory for all Camelot employees to complete an online training module on the Modern Slavery Act. Employees are sent weekly reminders until they have completed it – if they don't complete it within a month their internet access is restricted until they have done so.

Looking forward

Training on the Modern Slavery Act will continue to be rolled out to any new starters and employees will need to complete refresher training. There will also be new specialised online training for the retail team.

ONGOING COMMITMENT

An update on progress in the action areas outlined in this statement will be included in our 2019 statement.

This statement has been approved by our Board, who will review activities and update this statement as necessary on an annual basis.



Nigel Railton
Camelot CEO