

# **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022/23**

**CAMELOT**

## INTRODUCTION

Operating with integrity sits at the heart of everything we do at Camelot UK Lotteries (“CUKL”). It is central to how we conduct ourselves and do business and supports our continued commitment to preventing modern slavery and human trafficking as part of our Corporate Responsibility strategy.

Businesses have a crucial role to play in eradicating modern slavery and human trafficking. At CUKL, we do our part by ensuring that the right governance is in place and we are engaging key stakeholders on the topic. Practically, this means maintaining our focus on implementing key policies, interacting with suppliers and retailers accordingly, and providing relevant training for our employees.

In this year’s Statement (FY22/23), published in accordance with section 54 of the Modern Slavery Act 2015, we detail the actions we have taken to recognise and mitigate any possible risks of modern slavery and human trafficking in our business and supply chain. We also evaluate the progress we have achieved since our previous Statement (FY21/22) and outline our plans for the forthcoming year (FY23/24).

## ABOUT US

CUKL has been the licensed operator of The National Lottery (“TNL”) since its launch in 1994. The current third licence commenced in February 2009 and will run until 31st January 2024.

We aim to maximise returns for Good Causes through selling National Lottery products in a socially responsible way, with a lot of people playing a little. Achieving this is made possible through our work in designing, promoting, and introducing new games, managing and maintaining our infrastructure, delivering services to players and winners and collaborating with our authorised suppliers and retail partners.

Preventing modern slavery and human trafficking forms only one element of our broader Corporate Responsibility strategy. Our strategic ambitions and the activities we undertake to be a good corporate citizen are set out in greater detail in the Corporate Responsibility section of our Annual Report and Accounts. National Lottery players have helped to raise over £47 billion for Good Cause projects, with more than 670,000 individual awards made throughout the UK – an average of 240 lottery grants in every UK postcode district\*.

\*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.

## OUR SUPPLY CHAIN

At CUKL, preventing modern slavery and human trafficking is a priority, and to this end having effective structures and processes in place is crucial.

Through our established governance and ways of working, we again successfully engaged with approximately 600 suppliers in the last year, with most of our expenditure on IT and marketing services. We continued with our approach of Relationship Managers across the business managing our supply chain on a daily basis with support from the Group Procurement team. This team helps by offering guidance, aiding in supplier selection, negotiating commercial terms and ensuring contracts are established to mitigate risk.

We carry out due diligence at all stages of engagement with our supply chain, including on-boarding new suppliers, reviewing existing ones and off-boarding those that are no longer required. Outside of these key points in time, we undertake regular monitoring and proactively engage with suppliers through surveys and audits to ensure our standards are being met and suppliers are compliant with relevant

legislation and regulations. It is important that our suppliers recognise and understand our commitment to preventing modern slavery and human trafficking, so we clearly communicate our expectations of them, their employees and their subcontractors in this respect.

We undertake a supplier conduct review each year with key suppliers to identify risks and evaluate compliance across a range of areas, including modern slavery and human trafficking. This year (FY22/23), we surveyed 26 high-risk suppliers and are pleased to report that no issues were detected. Following last year's success of introducing an additional supplier assessment focussed purely on compliance with the Modern Slavery Act 2015, we carried this out again. Our Modern Slavery supplier assessment was carried out with 40 suppliers based on the goods and/or services they supply, in which they were asked to confirm their approach to the following:

- Identification of modern slavery and human trafficking risks specific to their organisation (if any) and the measures they have put in place to mitigate such risks.
- Methods adopted during their own supplier selection processes – to ensure that subcontractors have adequate Modern Slavery policies and procedures in place.
- Process for monitoring employee and subcontractor compliance with the Modern Slavery Act 2015, and relevant policies and procedures.
- Modern Slavery training provided to their employees and, where relevant, the employees of their subcontractors.

All suppliers who responded were able to confirm their compliance with the Modern Slavery Act 2015 and provided confirmation of having appropriate policies and procedures in place, where appropriate. As only a selection of suppliers participated in the assessment, we communicated with all other suppliers to share our Modern Slavery and Human Trafficking Statement and reaffirm our expectations regarding modern slavery and human trafficking. This engagement also opened the door for suppliers to ask any questions or express concerns on the topic.

As an organisation, we are committed to preventing modern slavery and human trafficking and will continue to take the necessary steps to ensure our supply chain remains compliant with relevant legislation and regulations.

## NATIONAL LOTTERY RETAILERS

Our retail estate comprises of around 43,000 National Lottery Retailers – a combination of independent and head office-led multiple retail establishments. To maintain the reputation, integrity, and security of The National Lottery, all of our retailers must sign a National Lottery Retailer Agreement which sets out our expectations of them to uphold high standards, including compliance with all applicable laws and regulations – such as the Modern Slavery Act 2015.

Last year (FY21/22), we committed to communicating regularly with our retailers and retail employees to further raise awareness of modern slavery and human trafficking. Since then, we have continued to share key messages through a variety of channels. Our National Lottery Retailer Hub website remained a helpful source of information, providing retailers with access to Modern Slavery content to support training employees on preventing modern slavery and human trafficking. We again used our retailer magazine, Jackpot, to publish a piece educating retailers on how to identify and prevent modern slavery, while also directing them to our latest Statement. To complement these efforts with retailers, we continued to deliver an enhanced modern slavery and human trafficking online training module for our retail employees. This training programme encompasses how to identify instances of modern slavery or human trafficking within our business and supply chain. It is compulsory for all employees within the Retail team to complete and pass to ensure they possess the necessary knowledge and skills to best support our retail partners.

We believe it is important to continue raising awareness about modern slavery and human trafficking in an effort to prevent it, and we plan to remain focused on communicating about it to our retail partners and employees.

## **POLICIES AND INFORMATION**

### **Whistleblowing Policy**

A critical piece to preventing and addressing modern slavery and human trafficking is giving employees, and those who are part of our supply chain, the confidence and resources to report concerns where the interests of others may be at risk. Our Whistleblowing Policy encourages our employees, National Lottery suppliers, and their employees and subcontractors, to flag concerns of malpractice within CUKL or our supply chain, including any potential risks of modern slavery and human trafficking.

The policy is reviewed annually and outlines our commitments and expectations, how to raise a concern and how we will review, escalate and investigate it. All CUKL employees and contractors are required to read and sign the policy and to confirm that they have done so. We also include it in the on-boarding process for our suppliers to raise awareness of our expectations. While the policy cannot cover every possible concern, it does provide examples of malpractice, including references to modern slavery and human trafficking.

We understand that raising concerns via internal channels may not be easy for everyone, so we also offer a confidential freephone whistleblowing hotline that operates 24 hours a day. The hotline is operated on behalf of CUKL by SeeHearSpeakUp, an external and independent organisation, to ensure that people can voice their concerns in confidence. We also comply with The Public Interest Disclosure Act 1998 (PIDA), which provides guidance on addressing whistleblowing issues in a safe and constructive manner and protects employees who raise concerns about malpractice.

### **Code of Conduct**

Integrity underpins our operations, and our Code of Conduct is one way that we communicate about and embed our values and the high standards of business conduct that are expected from all CUKL employees. It also links to our Whistleblowing Policy, which provides guidance for reporting any unethical behaviour or violations of the Code. All National Lottery suppliers are required to implement their own Code of Conduct, using ours as the minimum standard. This helps to align our suppliers with our values and maintain expected conduct in their business practices.

We have completed our annual review of the Code of Conduct and Whistleblowing Policy and have made necessary updates. To promote awareness and compliance with the policies internally, all employees must read them and sign to confirm they have done so.

We are committed to ensuring that our Whistleblowing Policy and Code of Conduct remain effective and relevant to our business operations. As such, they will be reviewed again in the coming year. It will remain a requirement for all employees to read and confirm their understanding of both policies on an annual basis.

## PLAYERS

National Lottery players can also assist in combating modern slavery and human trafficking. We encourage them to reach out to us if they observe anything that may be of concern – this is outlined in our Players' Guide, which is accessible both online and in-store.

## TRAINING

Ensuring our employees understand the risks of modern slavery and human trafficking within our business and supply chain is vital in preventing its occurrence. To raise awareness and build knowledge on the topic, we run an annual modern slavery training module which all of our employees are required to complete and pass. As part of this training, they are also required to read and sign our Modern Slavery and Human Trafficking Statement. To ensure that the training remains accurate and useful, we will again review and update it next year. Our intranet will also continue to serve as a central channel to keep our employees informed of our commitments and to share resources related to the prevention of modern slavery and human trafficking.

## ONGOING COMMITMENT

Our Statement affirms our commitment to taking steps to prevent and address modern slavery and human trafficking in our business and supply chain. This Statement has been approved by our Board and will be reviewed annually.