The background is a solid green color. It features several abstract geometric shapes: a white triangle in the top left, a pink line forming a shape like a stylized arrow or '7' in the top right, a large white circle on the right side, a pink curved line in the bottom middle, a white curved line in the bottom right, and a white jagged line in the bottom left.

CAMELOT

MODERN  
SLAVERY  
AND HUMAN  
TRAFFICKING  
STATEMENT

**2021/22**



## INTRODUCTION

Doing business responsibly and operating with integrity underpins everything we do at Camelot UK Lotteries ("CUKL"). This includes our ongoing commitment to preventing modern slavery and human trafficking, something we prioritise as a part of our Corporate Responsibility strategy.

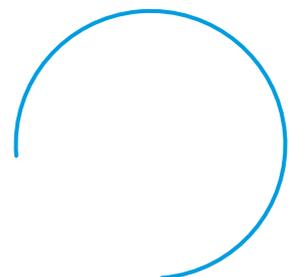
There is an important role for businesses to play in eradicating modern slavery and human trafficking. At Camelot UK Lotteries, we play our part through a range of activities, from how we engage with our suppliers and our retail partners, to training our employees and ensuring we have supportive policies in place. In this year's Modern Slavery and Human Trafficking Statement (FY21/22), made pursuant to section 54 of the Modern Slavery Act 2015, we set out the steps we have taken to understand and mitigate any potential risk of modern slavery and human trafficking in our business and supply chain, review the progress made since our last Statement (FY20/21) and set out our ambitions for the coming year (FY22/23).

## 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 31 January 2024.

Our overarching aim is to maximise returns to Good Causes through selling National Lottery products in a socially responsible way, with a lot of people playing a little. We achieve this through creating, marketing and promoting new games, developing and running the lottery infrastructure, providing services for players and winners, and working with our approved suppliers and retail partners. Acting as a responsible corporate citizen is central to delivering on our strategic ambitions and is detailed further in the corporate responsibility section of our annual report and accounts. 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.

To date, National Lottery players have helped to raise over £46 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.



## OUR SUPPLY CHAIN

Ensuring we have the right structures and processes in place is central to our effort to prevent modern slavery and human trafficking. This is critical as in the last year CUKL worked with around 600 suppliers, with the majority of our spend relating to IT and marketing services.

On a daily basis, our supply chain is managed by our Relationship Managers, who are supported by the Group Procurement team. This team provides guidance and assists in supplier selection processes and negotiating commercial terms through to putting in place contracts which mitigate risk.

CUKL undertakes due diligence at all stages of engagement with our supply chain. We do this through how we on-board new suppliers, ahead of the decision to on-board any new supplier; reviewing our existing suppliers; and in the off-boarding process with suppliers who are no longer required. Ongoing monitoring and proactive engagement through surveys and audits also help us ensure our standards are being met and suppliers are complying with all relevant legislation and regulations.

We actively communicate about CUKL's commitment to preventing modern slavery and human trafficking to our suppliers. These communications clearly set out our expectations of suppliers, their employees and their subcontractors. Additionally, where appropriate, Group Procurement will apply relevant selection criteria into sourcing processes to ensure that new suppliers also understand and share our commitment to corporate responsibility.

Every year, we complete a supplier conduct review to assess the compliance of key suppliers in relation to a wide range of topics, including modern slavery and human trafficking. We assess supplier responses to identify potential risks and incidents of non-compliance. This year (FY21/22), we completed the review with 24 key suppliers. We are pleased that no issues relating to modern slavery and human trafficking were identified and all suppliers successfully passed the review.

We know it is important to continue evolving our approach when it comes to monitoring our supply chain. This year (FY21/22), Group Procurement created an additional supplier assessment focussed purely on compliance with the Modern Slavery Act 2015. We reviewed our supply chain to identify a list of participants based on the goods and/or services they provide. In total, 44 suppliers were reminded of the need to disclose any convictions or breaches in relation to the Modern Slavery Act 2015, and were asked to provide evidence of appropriate policies and procedures. They were also asked to confirm how they approach 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.

We were reassured to find that all of the suppliers contacted did not have any convictions or breaches in relation to the Modern Slavery Act.

As an additional step, we sent a communication to all other suppliers who were not invited to participate in the full assessment process. This communication included our Modern Slavery and Human Trafficking Statement and a reminder of the expectations and obligations we place upon our supply chain. Suppliers were also given the opportunity via this communication to ask any questions or raise any concerns.

We will continue to conduct the outlined assessments over the next year (FY22/23).

## NATIONAL LOTTERY RETAILERS

Our retail estate consists of approximately 44,000 National Lottery Retailers, most of which are independent retail outlets. All of our retailers are required to enter into 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, including the Modern Slavery Act 2015.

In the financial year FY20/21, we committed to communicating with our retail partners on an ongoing basis and work with our retail employees to raise awareness of modern slavery and human trafficking. We have taken several steps to fulfil this commitment, including providing retailers with resources on the Retailer Hub website, where they can refer to Modern Slavery content to help train their staff on preventing modern slavery and human trafficking. We also published an article in our Retailer Jackpot magazine which featured an educational piece on how to help prevent and spot the signs of modern slavery and which directs retailers to our most current Statement. To support this, we rolled out an additional enhanced Modern Slavery and Human Trafficking online training module for our retail employees, which covers identifying modern slavery or human trafficking in our supply chain and business. This training is mandatory for all of our retail employees to complete and pass, and is especially crucial for our retail team to undertake in order to best support our retailers.

Looking ahead, we will continue communicating regularly with our retailers and retail employees to further raise awareness of modern slavery and human trafficking.

## POLICIES AND INFORMATION

### Whistleblowing Policy

At CUKL, we want our staff and those we engage with through the supply chain to feel empowered to report any concerns where the interests of others, including The National Lottery or CUKL, may be at risk. Our Whistleblowing Policy encourages our staff, as well as National Lottery suppliers and their subcontractors and employees, to raise any concern of malpractice either within CUKL or our supply chain. This includes speaking up about any risk of modern slavery and human trafficking.

Our Whistleblowing Policy is reviewed each year and promoted via our intranet. It is mandatory for all CUKL staff and contractors to read it and sign to confirm that they have done so. To increase awareness of the policy and our expectations of our suppliers, we include it in their on-boarding process. Although the policy cannot provide an exhaustive list of potential concerns, amongst the examples of malpractice highlighted, modern slavery and human trafficking is referenced. In particular, the policy sets out our commitments and expectations as well as how to raise a concern and how we will review, escalate and investigate it.

To give people the confidence to voice any concerns, alongside internal avenues for raising matters, we also have a confidential freephone whistleblowing hotline operated 24 hours a day on CUKL's behalf by SeeHearSpeakUp – an external and independent organisation. We also comply with The Public Interest Disclosure Act 1998 (PIDA) which provides guidance for dealing with whistleblowing issues in a safe and constructive way and offers protection to employees who raise concerns about malpractice.

### Code of Conduct

Our Code of Conduct sets out our values and the expected standards of business conduct from all CUKL employees, and links to our Whistleblowing Policy. All National Lottery suppliers are under an obligation to implement a Code of Conduct for their business, using ours as a minimum requirement.

We have completed our annual review of the Code of Conduct and Whistleblowing Policy, making updates where appropriate, and we require all employees to read it and sign to confirm they have done so.

Both our Whistleblowing Policy and Code of Conduct will be reviewed again in the coming year to ensure they are fit for purpose and updated accordingly. We will continue to require all employees to read and sign that they have read these two documents on an annual basis.



## PLAYERS

National Lottery players can also play a part in tackling modern slavery and human trafficking. We encourage them to contact us if they have seen anything of potential concern – this is referenced in our Players' Guide which is available both online and in-store.

## TRAINING

Training and raising awareness is crucial to keep our employees up to date about the risks of modern slavery and human trafficking in our business and supply chains.

We delivered our annual modern slavery training module for all of our employees, which covers what modern slavery and human trafficking is. All employees are required to complete and pass this module.

Ensuring this training is both accurate and helpful remains a priority, and we plan to continue reviewing it annually and updating it as needed. We will also continue communicating via our intranet to keep our employees informed of our commitments and to share key resources related to preventing modern slavery and human trafficking.

In addition to this, all employees are required to read and sign our Modern Slavery and Human Trafficking Statement.

## ONGOING COMMITMENT

This Statement details our commitment to having the most effective responses in place to address and prevent modern slavery and human trafficking in our supply chain and our business. We will share how we have further developed these responses in our next Statement covering FY22/23 in July 2023.

This Statement has been approved by our Board and will be reviewed annually.

