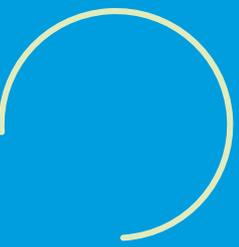
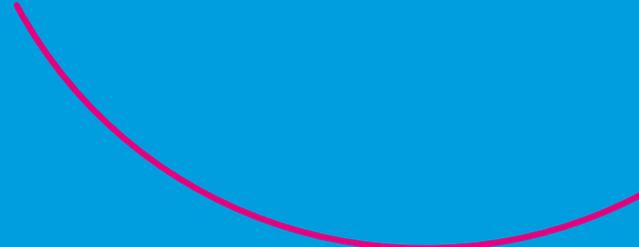
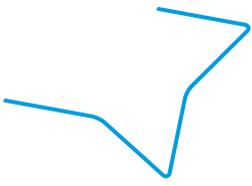


MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FY20/21



CAMELOT



INTRODUCTION

This statement sets out Camelot UK Lotteries ("CUKL") actions to understand potential modern slavery or human trafficking risks related to our business and to take steps aimed at ensuring that there is no modern slavery or human trafficking in our own supply chains and in any part of our business. Camelot UK Lotteries is fully supportive of the aims of section 54 of the Modern Slavery Act 2015 and we are committed to preventing modern slavery or human trafficking. Our Corporate Responsibility strategy reflects this with a pillar focused on our supply chain and the issue of modern slavery and human trafficking.

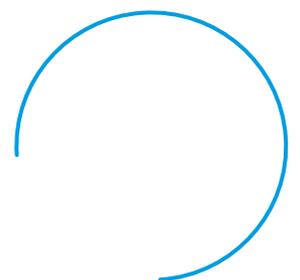
This statement is made by CUKL, pursuant to section 54 of the Modern Slavery Act 2015. It covers the commitments we made in our previous Modern Slavery and Human Trafficking Statement (FY 2019/20), the activity we have completed this year (FY 2020/21) and our commitments for the coming year (FY 2021/22).

ABOUT US

CUKL has been the licensed operator of The National Lottery ("TNL") since its launch in 1994. In May 2020, the Gambling Commission announced its intention to extend the current (third) Licence by an additional six months until 31 July 2023. In March 2021, the Gambling Commission published an updated Licence to reflect this revised expiry date.

As the operator of The National Lottery, we are committed to maximising returns to society, including supporting Good Causes, in a responsible way with a lot of people playing a little. This involves creating and marketing new games, developing and running the lottery infrastructure, providing services for players and winners, and working with our approved suppliers and retail partners. 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 £43 billion for Good Cause projects, with more than 635,000 individual awards made throughout the UK – the equivalent of more than 225 lottery grants in every UK postcode district.



OUR SUPPLY CHAIN

In FY 2020/21, CUKL worked with around 600 suppliers. The majority of CUKL's spend is with providers of IT and marketing services. Our supply chain is managed on a daily basis by CUKL's Relationship Managers, supported by our Group Procurement team.

The role of Group Procurement is to provide professional and proactive procurement advice. Group Procurement supports supplier selection processes, helps Relationship Managers to negotiate contracts that mitigate risk, and assists with ongoing supplier management activity.

CUKL undertakes appropriate due diligence in respect of its supply chain. We do so throughout the supplier lifecycle – from engagement of new suppliers, when reviewing the performance of existing suppliers, and as we off-board suppliers that are no longer used. Group Procurement proactively engages suppliers – conducting surveys and audits to ensure our standards are being met, and suppliers are complying with all relevant legislation and regulations.

With help from Relationship Managers, Group Procurement takes proactive steps to communicate with our supply chain – educating suppliers on various topics including our commitment to preventing modern slavery and human trafficking in all forms. We clearly set out what is expected of our suppliers, their employees and their subcontractors. Where appropriate we introduce relevant selection criteria into sourcing processes – to ensure that the suppliers we work with share our commitment to corporate and social responsibility.

In FY 2020/21 we completed our annual supplier conduct review with 24 key suppliers. This review seeks to assess the compliance of key suppliers in relation to a wide range of topics, including modern slavery and human trafficking. Supplier responses were assessed to identify potential risks and incidents of non-compliance. No issues relating to modern slavery and human trafficking were identified and all suppliers that submitted a response successfully passed the review.

In FY 2021/22 Group Procurement will build on the supplier conduct review with an assessment focussed purely on compliance with the Modern Slavery Act 2015. Our supply chain has been reviewed to identify a list of participants – based on the goods / services they supply.

Suppliers will be asked to disclose any convictions or breaches in relation to the Modern Slavery Act 2015, and to provide evidence of appropriate policies and procedures. Via a list of targeted questions respondents will be required 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

A communication will be issued to all other suppliers not invited to participate in the full assessment process. We will re-issue our Modern Slavery Statement and a reminder of the expectations we place upon our supply chain. This communication will provide a channel for any questions or concerns to be raised by suppliers.

NATIONAL LOTTERY RETAILERS

We have a large retail estate of approximately 44,000 National Lottery Retailers, most of these being 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.

In FY 2019/20 we committed to communicating with our retail partners on an ongoing basis and work with our Retail Sales team to explore how we can further raise awareness of modern slavery and human trafficking. We have delivered on this commitment by adding additional resources to the The National Lottery retailer website, where retailers can easily take free Modern Slavery training and access resources to help train their staff on preventing modern slavery and human trafficking. We also published an article in our Retailer Jackpot magazine directing retailers to our most current statement and sharing ways in which they can help to spot the signs of and prevent modern slavery and human trafficking. To complement this, we rolled out another enhanced Modern Slavery and Human Trafficking learning module, which all of our retail employees were required to complete and pass.

In the coming year we will continue to communicate with our retailers and retail employees to further raise awareness of modern slavery and human trafficking.

POLICIES AND INFORMATION

Whistleblowing Policy

The government relies on the general public to report any concerns where the interests of others, including The National Lottery, may be at risk and we encourage our CUKL employees to do so. We also 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.

Our Whistleblowing Policy encourages CUKL employees, National Lottery suppliers and their subcontractors and employees, to assist CUKL in tackling any fraud, corruption, unlawful conduct or other malpractice which may occur within either our organisation or through our supply chain.

During the on-boarding process for all National Lottery suppliers we share our Whistleblowing Policy. This highlights our expectations regarding modern slavery and human trafficking and their obligation to comply with all relevant legislation. The policy includes modern slavery and human trafficking as an example of malpractice and emphasises that if we have any concerns we will review, escalate and thoroughly investigate them.

We have reviewed our policy and it will be shared with all employees who are required to read and sign to confirm they have read it.

Code of Conduct

Our Code of Conduct clarifies our values and the expected standards of professional conduct from all CUKL employees, as well as linking 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.

We have completed our annual review of the Code of Conduct and made updates where necessary. It will be shared with all employees who are required to read and sign to confirm they have read it.

PLAYERS

We encourage our players to contact us if they have seen anything that represents a potential concern – this is referenced in our Players' Guide which is available both online and in-store.



TRAINING

It is vital that all of our employees are trained and kept up to date regarding risks of modern slavery and human trafficking in our business and supply chains, ensuring we operate in a responsible way.

We rolled out a further compulsory online Modern Slavery training module that covers topics such as best practice and the appropriate action needed to monitor and prevent any instances of modern slavery or human trafficking in our supply chain and business. All employees are required to complete and pass this module. Alongside this all employees are required to read and sign our Modern Slavery and Human Trafficking Statement.

We will continue to review all training, making necessary updates where required and ensure it is fit for purpose. We will also continue to clearly communicate our commitments via our intranet.

ONGOING COMMITMENT

This statement outlines our commitment to enhancing our approach to spotting the signs of and preventing modern slavery and human trafficking both in our supply chains and in any part of our business. We will share updates on these activities in our next statement covering FY 2021/22 in July 2022.

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

