



BETFRED MODERN SLAVERY ACT STATEMENT 2025

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 2025.

Our Organisation

This statement applies to all companies within and associated to the Betfred Group.

Betfred organisational structure

Betfred Group is privately-owned and its companies operate high street and multi-channel betting and gaming businesses. We operate over 1250 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 over 7,000 people, with most of our employees working in our shops 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 Head of Retail Operations. Within these 2 divisions, there is also a Senior Area Manager in each reporting to the Divisional Manager. Across the 2 divisions, there are 24 areas, each with an Area Manager, two Area Supervisors, and an Area Administrator. Due to the strict regulated nature of our businesses, all our shop-based employees must be over 18 years of age. In addition to shop-based employees, we have over 700 employees based in our Head Office in Birchwood, Warrington and additional 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 USA and South Africa and we will ensure the ethos and commitment to zero tolerance to Modern Slavery is embedded in all our overseas operating companies.

Definitions

The Betfred Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Betfred Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Betfred Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Betfred Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

Assessment of modern slavery risk

As we are an entertainment business, selling experiences rather than physical products, our workforce is highly trained due to the unique nature of our business against other retailers and the technical and highly regulated nature of our offering. We have a relatively small supply chain compared to other high street retail businesses and this is largely characterised by the purchase of data rights, software and premises licences, IT and technology, telecoms, communications, marketing, and professional services.

The Board of Betfred Group is cognisant of the continuing risks, impacts and costs of global slavery and human trafficking and fully supports both the original principles of the Modern Slavery Act and the guidance first published in 2017. The Betfred Group maintains a zero- tolerance approach to slavery and trafficking in all its forms, in any parts of its business or supply chains which remain materially 'low risk'.

We have taken and will continue to take steps to ensure such practices do not take place in our business or anyone who supplies goods and services to us and will keep the issue under review on an annual basis and respond accordingly. Advice, guidance and where applicable, training will be provided to those within the company who have responsibility for checking and monitoring supply chains and our intention is to refresh this training annually.

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 employees 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 'Speak Up' Whistleblowing Policy and procedure through which employees 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 employee.

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 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 policy 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 is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each year.

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

Policy info

Version No.	Review Date	Change made by	Reason for change
1	01/04/2023	Megan Attwood – ER Advisor	Statement reviewed - retail structure clarified and working practices section added.
1.1	01/04/2024	Megan Attwood – Senior ER Specialist	Statement reviewed - Training section added.
1.2	03/02/2025	Megan Attwood – Senior ER Specialist	Statement reviewed - added commitment section and amended retail structure and shop/staff numbers.

Policy owner: UK HR Team

Ownership and confidentiality

This document should not be shared with anyone externally without permission from your Director. This policy and any associated documentation remain the property of Betfred and should be returned if requested.