



# Anti-Modern Slavery and Human Trafficking Statement 2024

## Introduction

Allwyn Entertainment Ltd (AEL) is the operator of The National Lottery in the UK.

We are part of Allwyn, a leading multi-national lottery operator that operates lotteries in Austria, the Czech Republic, Cyprus, Greece, Italy and the UK. Allwyn also operates the Illinois lottery under a private management agreement in the United States.

Following a competitive process, on 1 February 2024, AEL became the first new operator in 30 years of The National Lottery.

This Statement, covering 1 February 2024 – 31 December 2024 and published in accordance with section 54 of the Modern Slavery Act 2015, details the actions taken by AEL to recognise and mitigate risks of modern slavery and human trafficking in our business and supply chain.

## About Us

Our vision is for The National Lottery to 'change lives every day'. This means both for the players who win life-changing prizes, as well as for the millions of lives who benefit from over £30 million in funding, that is raised for National Lottery Good Causes, on average, every week.

Our values are Trusted, Inclusive and Innovative, and we set our goals and measure our performance against them. We are working hard to ensure these values drive our culture and underpin everything we do, including our commitment to preventing modern slavery and human trafficking.

As steward of The National Lottery, we also care about the way in which we generate more funding for Good Causes – so operating with integrity, protecting participants, and driving social value underpins everything we do. This informs every aspect of our business, including how we design and build new lottery products, operate our business, collaborate with stakeholders and report on our progress.

Our approach to driving social value is based on our Social Value Framework, with four key pillars:



\*linked to our Participant Protection strategy

### Responsible Play:

protecting the interests of everyone who plays, engages, or interacts with The National Lottery.

### Empowering People:

making all parts of The National Lottery inclusive, accessible, and fair.

### Protecting the Planet:

building a net zero National Lottery.

### Prosperous Places:

helping communities and high streets thrive.

Our anti-modern slavery and human trafficking activities are aligned with our Empowering People pillar.

From 1 February 2024 to 31 December 2024 we:

Employed 1525\* people

Raised over £30 million per week, on average, for Good Causes

Partnered with 497 suppliers

\*Fixed term and permanent colleagues

<sup>1</sup>In Italy, the Group holds a 32.5% interest in Lottolitalia, a joint venture with IGT Lottery

## Achievements

We had no reported incidents of modern slavery or human trafficking within our business or supply chain between 1 February 2024 and 31 December 2024.

To demonstrate our commitment to growing The National Lottery in a responsible way, in December 2024, we commissioned Business in the Community to conduct a gap analysis of our approach to anti-modern slavery and human trafficking.

The analysis included recommendations on how AEL might further enhance its 'responsible business' approach to anti-modern slavery and human trafficking, not only within our business and supply chain but stretching further to retailers. Outcomes of this project will be broken down into a risk-based short, medium, and long-term plan, which will be delivered across our 10-year licence.

We know that suppliers play a critical role in achieving our commitment to preventing modern slavery and human trafficking. To support this, in 2024, we launched our Social Value Questionnaire to engage with suppliers and better understand their approach to responsible business best practice – including their anti-modern slavery and human trafficking approach and processes.

We provided tailored questionnaires to micro, and small and medium-sized enterprises, as well as large organisations, while ensuring each answer received a fair score. We offered guidance materials alongside the questionnaire, to support supplier development in addressing modern slavery and human trafficking risks, as well as aligning to best practice activities. This approach was in line with our dedication to collaborate with suppliers, promote ethical practices and grow The National Lottery responsibly.

## Our Colleagues

We recognise that we play a vital role in upholding the fundamental rights and dignity of individuals, ensuring that we are not complicit in any practices that exploit or harm vulnerable people. To support this, we shared and adhered to a range of internal policies that provided clear guidance on the steps for all colleagues to take in order to address and prevent modern slavery and human trafficking. These policies, which were a requirement for all colleagues to read and sign, included (but were not limited to) an Anti-Modern Slavery and Human Trafficking Policy, Code of Conduct Policy, Whistleblowing Policy, Social Value Policy, and Anti Bribery and Corruption Policy.

**To help our colleagues understand the importance of preventing modern slavery and human trafficking within our business and supply chain, the risks of not doing so and how to report it if it is suspected, we shared various forms of training, educational and awareness content, this included (but was not limited to):**

- Internal Intranet pages, which housed various information and resources, keeping our colleagues informed of our commitments.
- A training module, which was mandatory for all colleagues.
- A mandatory enhanced training module, tailored for only our retail-facing colleagues.

In 2024, we selected and trained 30 Social Value leads from across all parts of the business, whose main purpose is to function as a 'go to' person within their team or department and be the first point of call in relation to social value matters – including anti-modern slavery and human trafficking activities

## Our Suppliers

Throughout the year, we focused on preventing all forms of modern slavery and human trafficking within our supply chain, for which over 90% of our direct suppliers were UK based. We recognised the importance of having effective structures, processes, and controls in place. Using a risk-based approach, we conducted due diligence at all stages, including during our onboarding processes.

All eligible suppliers above a £10k total contract value were required to complete a Social Value Questionnaire. Each supplier's response was reviewed and given a score. If their modern slavery and human trafficking related score was outside our tolerance, we would choose not to onboard them. In 2024, no scores, in relation to modern slavery and human trafficking, fell outside of our tolerance.

All new suppliers were required to read and adhere to a range of policies during their onboarding, including (but not limited to): an Anti-Bribery and Corruption Policy, Acceptable Use Policy, and Supplier Code of Conduct.

In an effort to minimise the risk of modern slavery and human trafficking in our supply chain, we included relevant provisions in our standard contractual terms where possible.



## Our Retail Partners

In 2024, we had over 43,000 retail partners, comprising of both independent and head office-led retailers. In alignment with the Modern Slavery Act 2015, we recognise that, while our retailers do not form a direct part of our business or supply chain, we include them in this statement and our activities, to reflect our commitment to going beyond our legal obligations in this area.

**To ensure the highest standards of ethical conduct, each retailer is required to sign our National Lottery Retailer Agreement, which outlines our expectations and holds them accountable to stringent anti-modern slavery and human trafficking standards, including (but not limited to):**

- Adhering to the Financial Crime Framework.
- Fully complying with laws related to money laundering.
- Have no convictions relating to modern slavery or human trafficking.
- Fully complying with the Modern Slavery Act 2015, if applicable.

In addition to this, our National Lottery Retailer Hub website was updated with helpful sources of information. Our Retail Training Centre, an e-learning platform, included training materials for retailers' employees on preventing modern slavery and human trafficking. We also published educational content in our retailer magazine, Jackpot, and all retailers have access to our Operational Excellence training programme, which includes materials on preventing modern slavery and human trafficking.

Our Security team also actively monitors our retail estate. If there are any incidents, they are reported to The Border Agency immediately, who, in turn, inform us of any suspected retailer incidents. The UK Immigration Services rely on the use of Civil Penalty Notices and the issue of Civil Penalties is a matter of public record. AEL obtains open-source data from

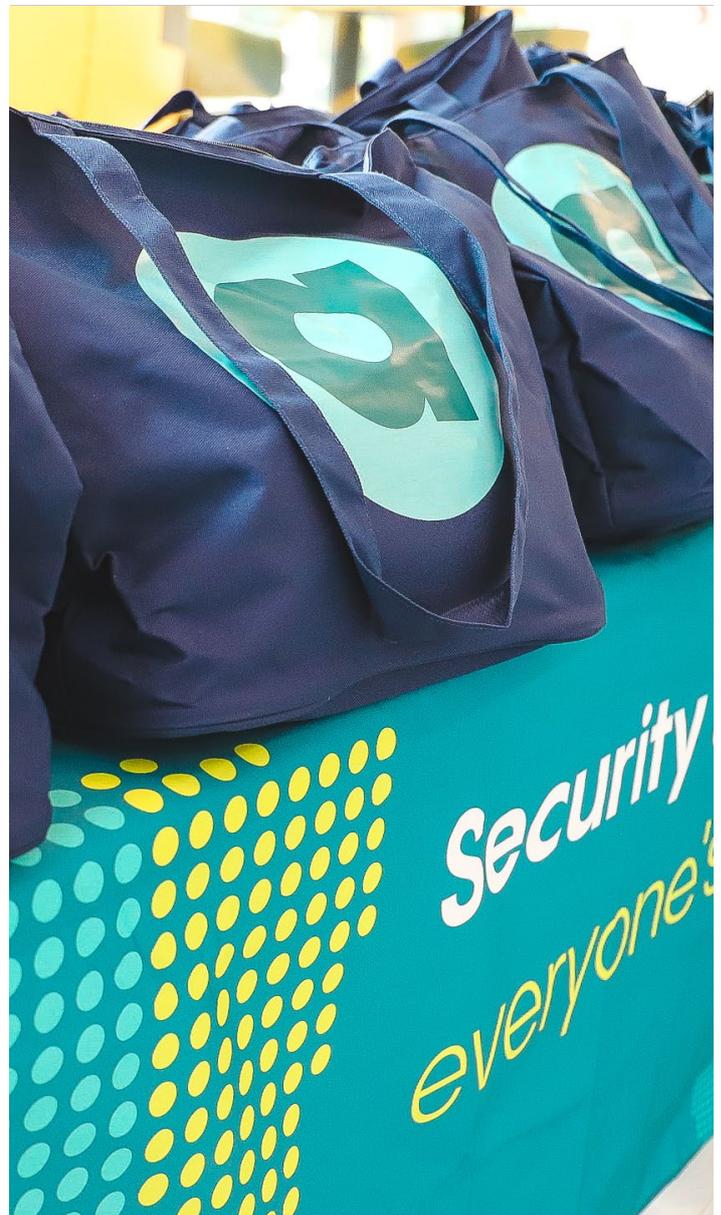
the Government website, as well as via press reporting. In addition to this, we have a close working relationship with the Immigration and Enforcement Teams, who are employed by the Home Office, and who regularly share disclosures directly with us. If any cases are identified, AEL will take swift action, which can include suspension and/or termination of the retailer's terminal and the removal of National Lottery products from their store.

In 2024, alongside our Security team, our Retail Sales team and Mystery Shopper Programme team regularly visited our retailers. Our mainland retailers were visited up to four times, while our retailers in the Islands and Highlands were visited at least once and had a specifically created outbound calls programme to give them additional support. If any of these visits or calls raised any concerns or suspicions, the appropriate reporting process was used, including reporting the case to the police and/or the national help line and/or the Borders Agency.

### Assessing and Managing Risks

AEL's Risk Management Policy sets out the business risk appetite and tolerance in order to strike an appropriate balance between operating the Fourth National Lottery and creating and protecting value for the business. Our Risk Appetite Statement, as contained in the Policy, sets out our appetite and tolerance for nine categories of risk, which are drawn from recognised risk management guidance and standards. In 2024, our appetite and tolerance for any risk related to modern slavery and human trafficking were both low, and we ensured robust controls with sufficient resources and oversight were in place.

Through our Risk Management Process, we identified risks associated with modern slavery and human trafficking, which were assessed and recorded on the appropriate team's Functional Risk Register and are owned by the Accountable Executive. We put in place effective controls to manage these risks, which were within appetite and tolerance.



### Accountability and Governance

The Board also sets the risk appetite and tolerance and is ultimately responsible for the management of risk. It has delegated oversight of risk management to our Compliance and Risk Management Committee, which meets at least quarterly. The Compliance and Risk Management Committee reviews principal risks and also reporting on our functional risks.

The Chief Corporate Affairs Officer is accountable for the production of this Statement and our internal Policy, as well as the activities delivered in relation to these. The Chief Corporate Affairs Officer also attends the Compliance and Risk Management Committee.

## Reporting

If any of our colleagues suspects modern slavery or human trafficking is happening within our business or supply chain, it can be reported immediately to our People team or to their line manager. If the concern is related to our retail estate, our Security team will be notified and an investigation conducted. National Lottery terminals will be suspended and/ or removed where applicable.

Similarly, if there are any concerns about the way we do business, it can be reported through our whistleblowing reporting lines, confidentially and anonymously if desired – and free of any retaliation, discrimination, or harassment – to any of our nominated contacts, or to the Gambling Commission.

The recipient of any concern raised is responsible for initiating an internal investigation of the concern. The nominated contact will promptly report any concern to the Audit Committee and Compliance and Risk anagement Committee.

If anyone suspects modern slavery or human trafficking outside our business, or if our supply chain or our retail estate needs further assistance, they can contact the Modern Slavery Helpline on 0800 0121 700. If it is an emergency or it is believed someone is in immediate danger, we advise that they contact the local police.



## Next Steps

### Gap Analysis

- In 2025, we will finalise our short, mid, and long-term plans, based on the findings and recommendations from our modern slavery and human trafficking gap analysis, in collaboration with Business in the Community. These plans will guide our efforts to address modern slavery and human trafficking within our business, supply chain and in our retail estate. Initially, we will focus on executing the activities outlined in our short-term plan, to further enhance best practice.

### Our Supply Chain

- We will continue reviewing our procurement and supply chain practices, adding greater transparency and oversight, if required. With an aim to evolve our supplier management process, we will ensure that we have robust processes in place.

### Policies

- We will review and update, where needed, all relevant policies, which will be shared as a mandatory read and sign for all colleagues.

### Training, Education and Awareness

- We will continue with all training in relation to anti-modern slavery and human trafficking, ensuring that all colleagues take part annually.
- We will share education and awareness communications through various available channels.
- We will also continue with all training, education, and awareness communications for our retail partners.

### Social Value Questionnaire

- We will continue to use this as part of our supplier onboarding process.

### Risk and Mitigations

- We will review and refresh, where needed, all of our principal and functional risks, ensuring that we have the appropriate mitigations in place.

This statement was approved by the AEL Board of Directors on 13 May 2025, in compliance with the Modern Slavery Act 2015.

