

## Modern Slavery and Human Trafficking Statement

This statement sets out Sporting Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending 31 December 2018.

Sporting Group is committed to improving its practices to combat and ensure that its supply chains are free from slavery and human trafficking.

### **Organisation's structure**

The Sporting Group is one of the world's leading names in sports betting technology and trading. The Group employs almost 300 staff, predominately at its central London HQ, but also has offices in Wigan (UK), South Africa and Canada. There are two principal divisions – a B2C operation, the pre-eminent sports spread betting company, and a rapidly growing B2B operation which supplies real-time pricing and sports trading capabilities to sportsbooks around the globe.

### **Our supply chains**

We are an entertainment business, selling experiences rather than physical products. Our workforce is highly skilled, due to the technical and highly regulated nature of our offering, and we have a relatively small supply chain. Sporting Group, operates with strategic and critical suppliers. Our supply chain is largely characterised by the purchase of data rights, software licences, IT and technology, telecoms, communications, marketing and professional services.

We have undertaken a proportionate risk assessment of in line with the requirements of the Modern Slavery Act 2015. Due to the nature of our business and the skill levels required from our employees and business partners we believe that our business and supply chains are at a 'low risk' of potential for slavery or trafficking. .

### **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our specific policies on key social and ethical issues, e.g. anti-bribery and corruption, harassment & bullying and whistleblowing outline the standards and behaviours that we expect from all our employees, wherever they are in the world, whatever local practices are and wherever they conduct business on behalf of the organisation.

Our organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The organisation's

whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

### **Due diligence processes for slavery and human trafficking**

Internally, we have a number of processes in place to verify the identity of our workforce to make sure we know exactly who is working for us. All employees undergo identity and right to work checks before they are offered a contract with us. We also carry out reference checks and, as appropriate, qualifications and licence checking, depending on their role.

As part of our initiative to identify and mitigate risk our due diligence and reviews include:

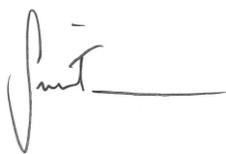
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- protecting whistle blowers.

### **Our effectiveness in combating slavery and human trafficking**

Sporting Group commits to:

- continuously assessing and reviewing exposure to slavery and trafficking risks across the Group's supply chain and taking the necessary steps to mitigate any risks identified.
- annually publishing progress and developments within the Group's practices in relations to the objectives of the Modern Slavery Act 1995.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018. This statement has been formally approved by the Board of Sporting Group.



**SIMON TRIM**

**Sporting Group CEO**

25 February 2019