



Slavery and Human Trafficking Transparency Statement 2019

The following statement is written in accordance with the requirements under Section 54 of the Modern Slavery Act 2015 and is applicable to the GVC Group (including its subsidiary companies) (hereafter “GVC” or “the Group”) which are listed on pages 154-161 of the [2018 Annual Report](#). The statement sets out the Group’s activities and measures taken between 1st January and 31st December 2018 to prevent modern slavery and human trafficking occurring within our own operations and extended supply chain.

Introduction

GVC aims to meet the highest standards in everything we do, from the way we run our business and manage our financial affairs, to how we support our people, our customers and the communities we work in. Some of those standards are legal requirements, but others simply depend on acting honestly, openly and with integrity as set out in the 10 guiding principles within our [Code of Conduct](#).

Ultimately, our success and our reputation depend on how we conduct ourselves both as individuals and as a business. We can only deliver short and long-term returns for our shareholders if our business is founded on principles of integrity and fair play.

Business Overview

GVC is one of the world’s largest sports-betting and gaming groups, operating in the digital and retail sectors. Incorporated in the Isle of Man, the Group holds licences in over 20 jurisdictions and employs a workforce of more than 25,000, in 20 offices across five continents.

The Group owns a comprehensive portfolio of established betting and gaming brand including; bwin, Coral, Crystalbet, Eurobet, Ladbrokes, Neds International, Sportingbet; CasinoClub, Foxy Bingo, Gala, Gioco Digitale, partypoker and PartyCasino. In the US, GVC operates Roar Digital, a joint-venture with MGM Resorts International.

GVC owns proprietary technology across all of its core product verticals and in addition to its B2C operations, provides services to third-party customers on a B2B basis.

On 28th March 2018, GVC completed the acquisition of Ladbrokes Coral Group PLC, the Group’s first move into retail operations. Further detail on the structure and performance of the Group can be found in the Strategic Report section of the [2018 Annual Report](#).

Our Approach

Modern slavery and human trafficking are on the increase, and slavery has become an important issue in several countries in which we operate. According to the International Labour Organisation, almost 25 million people are estimated to be trapped in forced labour; 16 million of whom are exploited in the private sector. We take this issue seriously and prohibit all forms of slavery, both in our own operations and within our extended supply chains.

Our approach is guided and reinforced by our Code of Conduct, and Environmental, Social, and Ethical Purchasing Policies which are communicated to all employees and explicitly referenced in our terms of engagement for all suppliers and business partners.

Although we have put in place steps to monitor and prevent modern slavery within our business and supply chain, we believe that we are at a low risk due to the nature of our business and the skill levels required from our employees and business partners. GVC is an entertainment business, selling experiences rather than physical products. As such we are minimally exposed to high-risk sectors such as agriculture, construction and extractives.

Our Workforce

Our workforce is highly skilled, due to the technical and highly regulated nature of our offering, and we have a relatively small supply chain compared to other high street retail businesses. The Group maintains strict

controls to ensure all permanent and contracted staff have a legal right to work in all of our locations. We minimise use of temporary labour in our shops or offices, and any temporary contractors at our head offices are highly skilled and vetted before being appointed.

As well as being part of GVC's core Code of Conduct – which is a mandatory component of the onboarding induction process for all employees – we have in place a standalone Modern Slavery Policy, available on our intranet sites and covering all Group employees. The policy sets out the importance of the issue, provides a clear definition of how to recognise modern slavery, employee obligations in respect of anti-slavery and the process to report any suspicious behaviours. All employees are required to complete an e-learning module to ensure they have read and understood our Code of Conduct.

GVC Workforce Anti-Slavery Obligations

All GVC employees, particularly those responsible for recruitment, together with anybody working for us, providing services to us or working on our behalf across GVC's global operations, must:

- Not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily or under threat of penalty;
- Comply with the minimum age requirements prescribed by applicable laws;
- Compensate workers with wages and benefits that meet or exceed the legally required minimum for that country;
- Abide by applicable laws concerning the maximum hours of daily labour;
- Take reasonable steps to ensure that any sub-contractors or suppliers from whom they source goods and/or services for ultimate use by GVC adhere to these requirements; and
- Bring any actual or potential cases of modern slavery to the attention of GVC's global HR Director immediately for further investigation using our Speak Out (Whistleblowing) procedure.

Our Supply Chain Due Diligence

Following the acquisition of the Ladbrokes Coral Group in 2018, the Group has taken on the best practice processes developed under Ladbrokes Coral and are deploying them across the enlarged Group. This is an ongoing process which we expect to complete over the coming year. Throughout the process, our approach is underpinned by the principle that third-party suppliers should uphold the same high business standards and values as ourselves.

In order to achieve this, our procurement policies set out to:

- Establish common minimum standards and other key guidelines to direct procurement activity throughout the lifecycle of an agreement with a third-party;
- Conduct the appropriate checks and reviews of all new suppliers;
- Specify the procurement department's role in managing third-party risk, regulatory and wider compliance requirements;
- Promote the fair treatment of third-parties;
- Provide guidelines for procurement engagement; and
- Minimise GVC's exposure to risks associated with services provided by suppliers and their access to GVC's information and information processing facilities.

At the end of 2018, GVC introduced a combined new supplier protocol which includes specific requirements that any third-party must have compliant anti-modern slavery policies in place. All suppliers to the Group must commit to conforming with UK and EU legislation where applicable. Where necessary, appropriate clauses will be used to reflect such legislation.

Risk Assessment Management

In line with the harmonisation of procurement practices across GVC, in 2019 we introduced a common risk assessment to consider modern slavery risks when engaging new suppliers. The risk assessment is made against criteria including:

- the nature of the product or services being procured;
- the origin of the supplier; and
- the Group location where the goods or services are to be utilised.

The product and country risk scoring methodology is derived from the Global Slavery Index by the Walk Free Foundation.

As part of the ongoing integration of Ladbrokes Coral operations into GVC, the enlarged Group's supplier base is being reviewed and rationalised. Based on annual spend thresholds for 2018, the top twenty existing suppliers have been screened and risk assessed. GVC has established a plan to assess all legacy suppliers as the integration continues. Legacy suppliers will be prioritised based on the product and country risk framework created for screening suppliers at on-boarding.

Monitoring and assessment

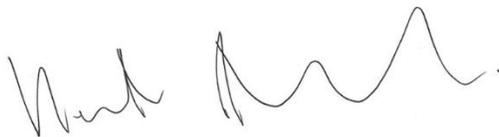
The GVC Code of Conduct and Modern Slavery Policy clearly set out our expectations; that all employees and suppliers act in a proactive, legal and ethical manner.

GVC may perform audits at any time. Any company found to have breached this policy or a company that has refused to cooperate with an audit of its employment or recruitment practices may have its supply agreement or other contract with us terminated immediately. We will also notify the relevant authorities as appropriate.

The Group has established a Modern Slavery Working Group with representatives from the Procurement, HR, Internal Risk Management, Legal and CSR teams to ensure that the Modern Slavery Policy is embedded throughout our organisation. and improvement awareness is raised across all levels of seniority and office locations.

Moving forward, GVC plans to improve how it measures the effectiveness of and compliance with its Modern Slavery Policy by establishing a measurement framework with clear metrics on employee and supplier compliance. Furthermore, specialised training courses are under consideration for specific teams dealing with supplier onboarding, invoice processing and those located in Group locations with higher inherent Modern Slavery risk.

This statement was approved by the Board of Directors of GVC on 4 June 2019 and will be reviewed annually. It is available on our website at: www.gvc-plc.com.



Kenneth Alexander
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