

MODERN SLAVERY STATEMENT

Organisation's structure and supply chain

Lottoland Holdings Limited (“**Lottoland**”) is headquartered in Gibraltar and is the holding company for a number of licensed entities involved with lottery betting and gaming (the “**group**”).

We recognise that modern slavery is a global threat that imposes an intolerable burden on those affected by it and that every step must be taken to reduce the suffering it causes. As a global operator, Lottoland is committed to preventing slavery and human trafficking in all areas of our business and we expect the same commitment from our employees, contractors, suppliers, and business partners.

Across our operations, Lottoland has a high proportion of colleagues performing highly-skilled roles. The majority of our employees are based at offices in Gibraltar, USA, UK, Australia, South Africa and Italy.

Most of Lottoland’s supply chain spend is in skilled sectors such as professional services, marketing, and information technology. The most common countries of origin for our suppliers include the UK, USA, Gibraltar, Spain and Slovakia.

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. We therefore have a range of policies in place that combine to ensure our employees and suppliers are aware that we have a zero-tolerance approach to the issue. These policies include our whistleblowing policy and our anti-bribery and corruption policy.

Together, these policies reflect 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.

We continuously monitor our policies and have systems in place to ensure that they are regularly reviewed and updated.

Due diligence processes for slavery and human trafficking

Our suppliers are primarily located in high-skilled and technical sectors and countries which generally present a low risk of modern slavery. Although the group is in the low-risk category, we endeavour to identify and mitigate any risk of slavery and human trafficking in our supply chains.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Ensure our outsourcing arrangements are subject to minimum contractual standards;
- Monitor potential risk areas in our supply chains; and

- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme which consists of:

- Pre-contractual supplier due diligence procedures to identify any risks; and
- Standard policy compliance and monitoring obligations built into our outsourcing arrangements.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Legal and Compliance;
- Human resources; and
- AML.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Reporting mechanisms

Any material legal, operational or reputational issues can be reported via an international, independent, whistleblowing service.

Our effectiveness in combating slavery and human trafficking

There have been no calls to Lottoland's confidential reporting mechanism outlined above and so the absence of any negative outcomes to date reinforces our belief that the group's operations are at low-risk of such activities.

We remain determined to expand and deepen the screening to account for the global nature of our supply chain and will continue to be proactive in monitoring our business for breaches.

Our future commitments

- To review and update our modern slavery statement every year in line with our commitment to ensuring that our business and supply chain remain free from any association with breaches of modern slavery legislation;
- To continue to develop our policies and processes to ensure our approach remains commensurate with our risk profile; and
- To monitor changes in our business and in the environments in which we operate to capture and manage any new or evolving risks so that our zero tolerance approach to modern slavery is maintained.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by the board on 5 December 2024.

DocuSigned by:
Nigel Birrell
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Nigel Birrell

Director for **Lottoland Holdings Limited**

Date: 5 December 2024