CAMELOT

ANTI-SLAWERY AND HUMAN TRAFFICKING STATEMENT

This statement was updated July 2017



INTRODUCTION

This statement covers the activities of Camelot UK Lotteries Limited (CUKL) and has been published in accordance with The Modern Slavery Act 2015. It sets out CUKL's actions during the financial year ending on 31st March 2017 and commitments for the next financial year to understand and prevent all potential instances of modern slavery and any human trafficking risks in our business and supply chain.

CUKL has been the licensed operator of the UK National Lottery since its launch in 1994. The current (Third) Licence commenced in February 2009 and, as a result of an extension, will now run until 31st January 2023.

Our overarching objective is to maximise returns to National Lottery Good Causes through selling lottery products in an efficient and socially responsible way. This involves creating, marketing and promoting new games, developing and running the lottery infrastructure, providing services for players and winners, and working in partnership with retailers. CUKL plays no role in the allocation of Good Causes' funding; this is the specific responsibility of 12 lottery distribution bodies, each with specialist knowledge of their sectors. CUKL's profit after tax is only around 1% of total revenue, while around 95% goes back to winners and society.

We are committed to preventing slavery and human trafficking in all our corporate activities, and to ensuring our supply chains are free from slavery and human trafficking.

OUR SUPPLY CHAIN

In 2016/17, CUKL worked with around 750 suppliers. The majority of our spend with suppliers is associated with IT and Marketing categories. Our suppliers are managed on a daily basis by CUKL Relationship Managers who are in turn supported by our Group Procurement Team.

The Group Procurement Team's role is to provide professional proactive procurement support that delivers solutions which meet business needs in terms of cost, risk management and supplier choice.

Our suppliers are chosen based on an appropriate selection of the following criteria;

- Quality, completeness and scalability of the service
- Management systems, processes and flexibility
- Relevant service experience and track record
- Diversity, sustainability, environmental and social considerations
- Risk transfer and management
- Cost and value for money



NATIONAL LOTTERY RETAILERS

Our retail estate of around 46,000 National Lottery retailers accounts for around 80% of CUKL sales, with independent outlets making up the majority of our retail estate.

All our retailers sign up to a National Lottery Retailer Agreement which outlines the high standards we expect of them, and which includes measures designed to ensure that they maintain the integrity and security of The National Lottery and comply with all applicable laws and regulations. We are committed to reporting any allegations of modern slavery, made in respect of any retailer selling National Lottery products, to the relevant law enforcement agency and fully assisting their investigations. Where a retailer is subsequently convicted of such a criminal offence then we would sanction the owner and this could lead to their agreement with Camelot being terminated.

Over the next year we are planning to communicate with National Lottery Retailers about our commitment to prevent instances of modern slavery and human trafficking within our supply chain, and reinforce our expectations of them.

POLICIES AND INFORMATION

Whistleblowing Policy

We encourage CUKL staff and National Lottery suppliers and their staff to report any concerns related to the direct activities carried out with or for CUKL. This forms part of our Whistleblowing Policy which encourages CUKL staff and National Lottery suppliers and their staff to assist CUKL in tackling fraud, corruption, unacceptable or unlawful conduct and other malpractice within the organisation, and in setting high standards of ethical conduct. These are very serious issues and CUKL is therefore committed to tackling any malpractice within the organisation at all levels.

Part of CUKL's strategy is to provide a way for any concerns about malpractice to be raised. We comply with The Public Interest Disclosure Act 1998 (PIDA) and the guidance it provides for dealing with whistleblowing issues in a safe and constructive way.

Although National Lottery suppliers are under an obligation to comply with all relevant legislation (including The Modern Slavery Act 2015), to raise awareness and make CUKL's position clear, we are updating our Whistleblowing Policy to specifically include modern slavery as an example of malpractice. Any concerns are reviewed and escalated to an appropriate level and are thoroughly investigated.

Over the next year we will also be communicating with our staff and suppliers of The National Lottery to inform them of our commitments and expectations of them, to prevent instances of modern slavery and human trafficking and to remind them of our Whistleblowing Policy if they have any concerns.

Code of Conduct

The purpose of our Code of Conduct's is to affirm our strong dedication to the highest standards of business conduct. It applies to all CUKL staff and it details the actions and behaviour expected when representing CUKL and links to our Whistleblowing policy. National Lottery suppliers are under an obligation to impose a Code of Conduct for their business, using ours as a minimum requirement.

Customers

We also encourage our customers to get in touch with us if they have seen anything that represents a potential concern—this is outlined in both our Players' Guide online and our in-store playstations. The message is also detailed on the back of all National Lottery tickets and Scratchcards.

MONITORING

CUKL undertakes due diligence in respect of its supply chains. We do so when considering taking on new suppliers, and reviewing existing suppliers through periodic review meetings, annual supplier surveys and audits when appropriate to ensure that our standards are being implemented, and that relevant legislation and regulations are complied with.

Our annual supplier conduct review survey is sent to approximately 25 suppliers. The suppliers that are chosen each year are selected based on the services they have provided to CUKL over the previous 12 months. The survey covers business ethics, supply chain management and human rights, plus broader corporate governance issues.

The survey questions are reviewed each year and will in future include a question addressing their approach to preventing and monitoring risks in modern slavery and human trafficking.

CUKL assesses any instances of potential non-compliance or concern on a caseby-case basis. We will only trade with suppliers, contractors and sub-contractors that fully comply with our policies or those who are taking verifiable steps towards compliance.

TRAINING

It is important that all relevant staff are appropriately trained and kept up-to-date regarding the risks of modern slavery in our business and supply chains.

This year we will be providing training for relevant staff to ensure they are upto-date with best practice and are taking appropriate action to monitor and prevent any instances of modern slavery or human trafficking.





An update on progress in the action areas outlined in this statement will be included in our 2018 statement.

This statement has been approved by our Board, who will review activities and update this statement as necessary on an annual basis.

Nigel Railton Camelot CEO

