



# Modern Slavery and Human Trafficking Statement August 2021 (For the Financial Year 2020)

## Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 (“Act”). It sets out the steps that Openbet Limited (Registered number 03134634) with a registered office at Fourth Floor Building 9 Chiswick Park 566 Chiswick High Road, London, W4 5XT and its associated UK companies (together “SG Digital”, “We”, “Our”) has taken during the financial year ending December 2020 to ensure that slavery and human trafficking is not taking place within any part of Our business and supply chain.

SG Digital carries out business worldwide in the licenced digital gaming and sportsbook sector operating from offices in Chiswick.

## Organisation Structure and Supply Chain

SG Digital is part of the Scientific Games Corporation group of companies (“Scientific Games”) headquartered in Las Vegas and listed on the US stock exchange (SGMS). Scientific Games is a leading innovator in the global lottery and regulated gaming industries. The Board of Directors (the “Board”) of Scientific Games has adopted Corporate Governance Guidelines to assist the Board and its committees in the exercise of their responsibilities to the Company and its stockholders. The primary responsibility of the Board is to exercise its fiduciary duty to act in the best interests of Scientific Games and its stockholders.

The Board monitors the performance of the Company, oversees strategic business plans and objectives of the Company and monitors the effectiveness of the controls that are in place to assure that the Company, management and employees operate in a legal and ethically responsible manner. The Board selects the Chief Executive Officer, elects the officers of the Company and oversees management who has responsibility for the conduct of the day-to-day operations of the business and affairs of the Company.

Worldwide, Scientific Games has approximately 9700 employees and serves customers from advanced technology manufacturing and operational facilities in North America, South America, Europe and Asia, with additional facilities located around the world based on customer requirements. Scientific Games continues to innovate with patented gaming technology and research-driven programs delivered to customers with the highest level of security, integrity and ethical standards

SG Digital employs over 1600 individuals across twenty + offices around the world, creating the technology and platforms powering the biggest on line gaming and sports brands. We have offices in major cities, such as London, Stockholm, Montreal, Athens, Singapore, Melbourne, Wellington and Bristol.

## Policies and Approach to modern slavery and human trafficking

Operating in a heavily regulated sector, We are unwavering in Our approach to compliance and intolerance to human rights violations including modern slavery and human-trafficking. SG Digital is committed to working with its suppliers to reduce risk of modern slavery and human trafficking within its supply chain. SG Digital has robust compliance procedures and checks which are carried out prior to on boarding and contracting with any new supplier.



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## Due Diligence Processes

The sector in which we operate is highly regulated and our business is guided by robust compliance procedures and checks.

SG Digital holds a UK Gambling Commission (“Commission”) licence covering its activities. All companies that we do business with in respect of gambling activities must be licenced by the Commission. Our obligations to the Commission include the senior management team each holding a personal management license for specified activities.

Prior to entering into a contract agreement and offering services, all new suppliers and all entities that we do business with must be vetted and approved by an internal Compliance department and Compliance Committee that is located in Atlanta, U.S.A. We also ensure that any intended business activities in any particular jurisdiction are approved by a dedicated Regulatory team that manages all operating licences and conduct worldwide.

Our Global Procurement Policies and Procedures oblige everyone responsible for overseeing the commercial relationships between Scientific Games and its suppliers to ensure that all aspects of our relationships are held to the highest ethical and professional standards. Our suppliers contribute significantly to the ongoing success of Scientific Games and Procurement in turn actively supports our suppliers and helps them achieve their objectives. Gaming requires all its suppliers to sign up to the **Scientific Games Code of Conduct (“Code of Conduct”)**, all suppliers are encouraged to conduct their business to standards set out in the Code of Conduct as a minimum.

SG Digital in all contracts requires suppliers to comply with all applicable laws and reserves the right to refuse to appoint or work with any supplier whose operation and or supply chain fails to comply with the requirements stated in the Code of Conduct and or any law or regulation.

We encourage a speak-up culture among all our stakeholders and promote addressing concerns on code breaches which extends to human rights violations such as Modern Slavery. All SG Digital contracts include a mandated whistleblowing clause requiring that potential non-compliance with the Code of Conduct can be securely reported 24/7 either via telephone or on-line to the ethics team. All reports are promptly and thoroughly investigated, and all information disclosed during the investigation is considered confidential. No discrimination or retaliation is tolerated against any person who, in good faith, reports such concerns

## **Risk Assessment and Management/Key performance indicators to measure effectiveness of steps being taken**

In 2020, no instances of modern slavery or human trafficking were raised or identified to SG Digital. Also, no reports were raised by employees, the public or by law enforcement agencies, through the whistleblowing hotline or otherwise.

If any issues are identified, or We suspect any supplier is involved in such activities, then We will conduct an appropriate investigation and if necessary, take prompt remedial action referring any such matters through to the Scientific Games Regulatory and Compliance teams.



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Separately, SG Digital use ISO27001:2013 principles and all entities within the SG Digital brand are certified to ISO 27001 for Our management systems and the development maintenance and support of online betting and gaming products.

SG Digital continues to take key steps to ensure increased awareness of modern slavery and human trafficking within its employees and supply chain, as a result SG has continued to work with and audit key suppliers and have included updates to our audit processes.

We have raised awareness with key members of staff but will continue to work on raising organisational awareness. SG Digital understands that risk and exposure to modern slavery is not static and may evolve as the business evolves. SG Digital will continue to mitigate this risk in the year ahead, and will seek new and innovative ways to ensure We are meeting our commitment to combat modern slavery and human trafficking.

### **Coronavirus (COVID-19)**

SG Digital takes its lead from Scientific Games which is fully committed to (i) helping its partners deliver safe and fun entertainment experiences for gaming, lottery, sports betting and iGaming. (ii) ensuring it operates safely and effectively with the best interests of its employees, partners and communities at heart during this time.

Employees are supported to work remotely, and those who visit customers or make games on site will do so responsibly. Although the offices have been closed to most employees during the pandemic, measures and controls were put in place to ensure the on-going safety of all employees having to attend offices. These include, social distancing and a one-way system with signage an extended cleaning regime throughout the building by both internal and a specialised sub-contractor cleaning teams, temperature monitoring of employees when entering the site, providing staff with the necessary equipment to allow them to work from home and implementing policies to protect the shielded and vulnerable. These measures will continue to operate in line with national government and SG Corporate policies and guidance.

SG Digital remained fully operational during the COVID pandemic and there have been no impact upon or changes within our supply chain during this period, however we will continue to monitor and assess for any new or increased Modern Slavery risks

### **TRAINING**

All SG Digital (and indeed Scientific Games) employees receive annual mandated training on the Code of Conduct and compliance requirements.

### **FURTHER STEPS**

SG Digital is committed to meeting its obligations under the Act and has a focused approach in ensuring its obligations have been met. SG Digital will continue to work with the rest of Scientific Games to combat the risk modern slavery and human trafficking. Whilst SG has a number of policies and procedures in place to combat modern slavery and human trafficking, We know that there is much more to be done.