

MERKUR Casino Holdings UK Limited Group of Companies - Modern Slavery Policy Statement

This statement sets out the actions of the Company to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at making sure 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 January 1st 2023 and December 31st 2023.

As part of the leisure gaming sector, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Our Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Please note that any breach of this policy will be taken seriously and may result in disciplinary action, or the cessation of business relationships.

Our Position on Modern Slavery and Human Trafficking

We take the issue of modern slavery and human trafficking extremely seriously and prohibit all forms of slavery in both our own Company and our supply chains.

Industries that are particularly at risk of modern slavery are labour intensive and characterised by a high proportion of migrant workers undertaking unskilled and irregular work, often supplied through recruitment intermediaries.

We are committed to applying our Equal Opportunities Policy at all stages of recruitment and selection, and we will avoid unlawful discrimination in all aspects of employment. All terms and conditions of employment are the same in all jobs of equal value as is the company equality policy. We make sure all our internal colleagues go through the same robust process for recruitment and training irrespective of how colleagues are recruited.

We are an entertainment business within the leisure gaming sector with skilled colleagues, due to the highly regulated nature of our offering, and have a relatively small supply chain compared to many other businesses.

We also work with a number of key suppliers, who provide products and services across of number of different areas, including, technology, software and telecoms, professional services, leisure products, property and premises and marketing. We do have suppliers for other products such as food and beverage, uniform, cleaning and janitorial materials, merchandise etc. to make sure our entertainment package can be delivered.

We are aware that certain products that we purchase from our suppliers may be sourced or manufactured from outside of the UK and have put in place certain steps and processes with our suppliers to prevent modern slavery to which we believe our business to be low risk due to the robust recruitment, training and skills required from our colleagues, and specific standards expected from all suppliers.

Relevant Policies

Our HR policies are fully compliant with the Equality Act 2010. The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. The list of relevant policies is detailed below.

- Whistleblowing Policy
- Supplier Due Diligence
- Due diligence

Commitments

- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- All our supplier contracts warrant that they comply with the Modern Slavery Act, and set out the minimum standards, required to combat modern slavery and trafficking.
- We are taking a risk-based approach as part of our supplier due diligence processes by ensuring that they have adopted a satisfactory approach to modern slavery and shall keep them under review.
- We will assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Consistent with our risk-based approach, we require employment and recruitment agencies and other third parties supplying workers to our Company to confirm their compliance with our Policy.

MODERN SLAVERY POLICY STATEMENT



- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance following their responses.
- If we find that other individuals or Company's working on our behalf have breached this policy, we will make sure that we take appropriate action. This may range from considering the possibility of breaches being remedied and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Mark Schertle – Chief Operating Officer
MERKUR Casino UK Holdings Limited
2 January 2023