

1 September 2021

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

Betway Limited (**Betway**) and its wider group of companies and affiliates (the **Betway Group**) operate an online gambling platform across a number of regulated online markets and holds licences in the UK, Malta, Italy, Denmark, Spain, Belgium, Germany, Alderney and Ireland.

Betway has various policies in place that operate to protect the public against, amongst other things, problem gambling and that are generally in place for corporate social responsibility. One of the risks these policies address relates to the deterring of modern slavery and human trafficking in accordance with the Modern Slavery Act 2015.

The Betway Group has a zero-tolerance to modern slavery and human trafficking practices within their business or along their supply chains. Whilst it is acknowledged that risk factors are present in all global supply chains and across all sectors, it is believed that the Betway Group's relative exposure to slavery, human trafficking and forced labour is low given the nature of its business as a highly regulated e-gambling enterprise.

The Betway Group operates from its offices in Malta and Guernsey, and its extended network of professional intermediaries (including accountants, lawyers, corporate service providers and e-payment processors). With direct contacts, the Betway Group is able to test these practices extensively and its ability to review practices and test them regularly is a strong factor in being able to keep the risk exposure low.

The Betway Group is certain that modern slavery or human trafficking practices are not taking place within its own business and is committed to taking necessary steps to ensure modern slavery or human trafficking practices are not taking place within any of its suppliers and/or affiliates. If Betway discovered that a supplier or an affiliate was in any way involved in modern slavery or human trafficking practices, Betway would immediately terminate its arrangement with such entity. Where appropriate, the Betway Group will continue to monitor existing business relationships for their risk management tools in relation to slavery, human trafficking and forced labour and will test relevant new suppliers as to their compliance with the Modern Slavery Act 2015 and its protocols.

The Betway Group has a robust recruitment process that ensures appropriate checks on new recruits are carried out prior to the relevant staff member commencing employment. The staff of the Betway Group are protected by its internal policies which are intended to reflect and uphold the Betway Group's commitment to a high standard of ethics and integrity in its business. Furthermore, all staff employed within the Betway Group are provided with compulsory training on any relevant policies and procedures in order to prevent money

laundering, to counter financing of terrorism and to ensure that Betway's services are not exploited by those wishing to conduct other criminal enterprises.

## **Application of the Policy**

The Betway Group has implemented risk assessment tools locally to assist with the monitoring of its exposure to slavery, human trafficking and forced labour and will keep both the tools and this statement under review as required; including, but not limited to, the use of third-party service providers who can immediately identify if an individual has been convicted of any offence.

Generally, Betway only deals with reputable suppliers of goods and services. It is Betway's aim to have a fully formalised approach to performing due diligence checks on any new partner or third-party supplier or for renewals of contracts relating to existing suppliers. Where such checks and due diligence process are already in place, these are constantly being reviewed to ensure they are kept up to date with local European legislative requirements and that any issues relating to money laundering or other criminal enterprises such as modern slavery and human trafficking are identified.

Betway ensures its contracts with third party suppliers include a requirement for such suppliers to comply with Betway policies where applicable This would include any such policy governing the prohibition on modern slavery and human trafficking practices.

The Betway Group aims:

- to act promptly where a breach of any slavery, human trafficking or forced labour policy is identified and reported; and
- to continue to improve its procedures through listening, review and acting appropriately.

*This statement is made pursuant to section 54 of the Modern Slavery Act 2015, is supported by the executive management team, approved by the Board of Directors of Betway and constitutes Betway's slavery and human trafficking statement for 2018.*

**Anthony Werkman**  
CEO