

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 (“**Act**”). It sets out the steps that: (i) Global Draw Limited (Registered number 03565480); and (ii) Barcrest Group Limited (Registered number 03500514) both with a registered office at SG House, 1 Howarth Court, Gateway Crescent, Chadderton, Oldham, England, OL9 9XB (together “**SG Gaming**”, “**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 Gaming carries out business in the United Kingdom in the licenced gaming sector operating from offices in Manchester.

Organisation Structure and Supply Chain

SG Gaming 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 9,700 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 Gaming’s primary customers for its gaming machines, game content and maintenance services are located within the United Kingdom. Our primary suppliers of gaming machines and peripheral parts are located predominately in Asia.

Policies and Approach to modern slavery and human trafficking

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

Due Diligence Processes

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

SG Gaming 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 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 jurisdictions 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. SG 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.

Scientific Games also holds the ISO 37001 accreditation which demonstrates a committed approach to stamping out corruption.

In all contracts SG Gaming 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 Gaming 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 online 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 Gaming. Also, no reports were raised by employees, the public or by law enforcement agencies, through the whistleblowing hotline or otherwise.

Questionnaires/self-assessments (the Supplier Self-Assessment Form) are sent to our key suppliers, which highlight and identify modern slavery and human rights requirements requesting information to be given regarding the availability of policies relating to modern slavery and human trafficking (as well as requiring information in respect of underage activity). We have some specific documents that we use for our supply chain regarding MSA, specifically PRO874 (an overview), DOC518 & 495 (Supplier Audit documents) and these form part of the supplier assessment and audit. These documents all make reference to and ensure that our supply chain have and understand a modern slavery policy.

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.

Separately, SG Gaming use ISO9001 principles and are certified to ISO9001:2015 Quality Management Standard. We are audited regularly by Lloyds register. We also ensure that Our supply chain including our contract manufacturers hold at least this standard. Pursuant to the accreditation, SG Gaming has demonstrated its ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements. SG Gaming aims to enhance customer satisfaction through effective application of the system including processes for improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements. This service level ensures that We have process and procedures in place that follow best practice to consistently provide products and services that meet customer and applicable statutory and regulatory requirements.

SG Gaming continues to take key steps to ensure increased awareness of modern slavery and human trafficking by 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 Gaming understands that risk and exposure to modern slavery is not static and may evolve as the business evolves. SG Gaming 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 Gaming 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; and (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 but those who visit customers or make games onsite 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 ongoing safety of all employees having to attend offices. These include, social distancing, 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, the wearing of masks when moving around buildings, 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.

As with most businesses, some staff had to be furloughed given the closure of gaming outlets during lock down. There has been a severe impact to Our global supply chains during this period. Lead times and freight have been delayed due to component availability and seaport congestion and Our usual factory visits have not been able to take place during this period.

TRAINING


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

FURTHER STEPS

SG Gaming is committed to meeting its obligations under the Act and has a focused approach in ensuring its obligations have been met. SG Gaming will continue to work with the rest of Scientific Games to combat the risk modern slavery and human trafficking.

This statement is approved by the Board of Directors of SG Gaming.

SIGNED by a duly authorised signatory for and on behalf
of **GLOBAL DRAW LIMITED**


Signature: 

Name: Simon Johnson

Title: SVP & Managing Director EMEA

Date: 03-Sep-2021

SIGNED by a duly authorised signatory for and on behalf
of **BARCREST GROUP LIMITED**

Signature: 

Name: Simon Johnson

Title: SVP & Managing Director EMEA

Date: 03-Sep-2021