

## **ZEAL Network SE – Modern Slavery and Human Trafficking Statement**

ZEAL Network SE ('ZEAL'), the parent company of ZEAL Group, is making this statement under the provisions of the Modern Slavery Act 2015 (the 'Act'). The Act requires ZEAL to state what actions it has taken during the financial year ending 31 December 2017 to ensure that neither slavery nor human trafficking (together, 'Modern Slavery') was taking place in its operations or supply chains.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. ZEAL has a zero tolerance approach to any form of Modern Slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within the business or our supply chain.

### **Our business**

ZEAL Network SE, the parent company of ZEAL Group, is headquartered in London. The Group specialises in the area of online lottery. We offer consumer facing lottery-based games as well as business to business solutions. The Group employs approximately 300 people in 4 countries around the world. Further detail on the structure and performance of the Group can be found in the Strategic Report section of the Annual Report and Accounts 2017, which is published on the Group's website.

### **Our policies**

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We operate a number of internal policies to minimise the risk that we are not conducting business in an ethical and transparent manner. These include:

1. Equality and Diversity policy – We operate a robust policy, which ensures that all employees are treated fairly, with dignity and respect.
2. Whistleblowing policy – We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

In addition, all employees are required to comply with the Employer's Policies, which explains the manner in which we behave as an organisation and how we expect our employees to act.

### **Due Diligence process**

As part of our compliance with the policies referred to above, we will take the following steps:

- Evaluate slavery and the human trafficking risks of new suppliers.
- Using internal procedures, check suppliers for their labour standards and compliance with slavery and human trafficking legislation; and
- Take steps to improve sub-standard suppliers' practices.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

### **Risk in our business**

When we consider, in combination the prevalence of forced labour in the countries in which we operate, our recruitment processes and qualifications needed to perform those roles, the risk of slavery or human trafficking occurring within our direct employee population is low.

Some roles within the Group are performed by the employees of third party contractors. The nature of these roles and the limited visibility of our contractors' recruitment processes increases the risk of slavery or human trafficking. The Group takes a risk-based approach to performing due diligence on our approved contractors, which includes reviewing contractors where the Group is undertaking business in high-risk countries or offering high-risk products or services. We have not identified or been made aware of any concerns regarding forced labour and we consider the risk relating to slavery or human trafficking concerning third party contractors to be low.

### **Employees**

ZEAL applies human rights considerations directly as they affect all employees; treating all employees with dignity and respect in an environment that is free from discrimination and harassment. ZEAL's commitment to respecting human rights is included within ZEAL's staff policies. All of these measures promote a safe, diverse and inclusive workplace. ZEAL employees are made aware of their employment rights through a variety of channels including written employment contracts, policies and staff websites.

### **Training**

Throughout 2018, ZEAL will continue to use internal communication channels to raise awareness of the issues of slavery and human trafficking. This will help our teams to understand the signs of Modern Slavery and what to do if they suspect that it is taking place within our supply chain.

### **Minimum wage**

In all countries where one exists, ZEAL operates at least the legal minimum wage. In countries where there is no legal minimum wage, ZEAL negotiates with the individual in line with market rates and we also use a salary benchmarking tool to ensure we pay fair market rate.

### **Our performance indicators**

We use the following Key Performance Indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring and payroll systems;
- Number of reports received from employees, the public, or law enforcement agencies to indicate that Modern Slavery practices have been identified.

We have not identified any deficiencies throughout the Group concerning the KPIs identified above.

Although we consider our business to be at a relatively low risk of Modern Slavery, we will keep the issue under review on an annual basis and respond accordingly.

**Approval for this statement**

This statement was approved by the Executive Board on 22 June 2018.

  
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CEO  
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