

# Modern Slavery and Human Trafficking Statement

2023



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## Document Version Control

	Author	Date	Description of change
V0.1	HR Business Partner		Document initiation for 2023
V0.2	Chief Compliance Officer /Head of Compliance & Deputy MLRO		Document review and feedback
V1.0	Head of Procurement		Finalised document for sign off

## Document Sign Off

This Statement is made on behalf of all the Board Members of the Company and reviewed by the Company’s Risk & Compliance Director, Chief Compliance Officer, Human Resources Director, and Chief Executive Officer, who will review and update the statement annually.

Person	Position	Date	Signature
Dominic Mansour	Chief Executive Officer	30/01/2024	

Proposed date of next review = December 2024 unless prior review required by legislation/business change.

# Purpose

Buzz Group Limited (Buzz Bingo: “the Company”) supports the objectives of the Modern Slavery Act 2015 (“the Act”) and the elimination of modern slavery and human trafficking. This statement is made pursuant to section 54 (1) of the Act for the financial year 2023.

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 15 January 2023 and 13 January 2024.

As part of the leisure sector, we recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking and we continue to take our responsibility seriously in the aftermath of the coronavirus pandemic.

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

Any breach of the provisions of this statement by employees will be taken seriously and may result in disciplinary action.

# Our Position on Modern Slavery and Human Trafficking

- We have a zero tolerance to modern slavery and human trafficking and prohibit all forms of slavery in both our own Company and our supply chains.
- We undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers to map out the supply chain to assess products or geographical risks of modern slavery and human trafficking. We have a comprehensive Procurement and Corporate Responsibility Code of Conduct for our suppliers.
- 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 employ just over 2,100 employees who are based solely at our sites in England and Scotland. We have strict recruitment processes in place to ensure that all our prospective employees are legally entitled to work in the UK, to safeguard employees from any abuse or coercion once in our employment and to ensure that they are paid at least the current National Minimum Wage / National Living Wage.
- We are fully committed to encouraging equality, equity, diversity, inclusion and belonging among our teams and we pride ourselves on providing equal opportunities at all stages of recruitment, selection and in employment eliminating all forms of unlawful discrimination

in employment and against customers. Accordingly, our terms and conditions of employment are the same for all jobs of equal value.

- We are an entertainment business requiring skilled colleagues due to the technical and highly regulated nature of our offering. We have a relatively small supply chain compared to other retail businesses.
- We also work with several key suppliers, who provide products and services across a number of different areas, including technology, software and telecoms, professional services, leisure products, property and premises and marketing and data rights. 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. We have, therefore, put in place certain steps, risk assessments and processes with our suppliers to prevent modern slavery and human trafficking, which we believe to be low risk to our business because of the robust recruitment, training and skills required from our colleagues, and specific standards expected from all suppliers.
- We will not engage in business with any organisation, whether inside or outside of the UK, which knowingly supports or is found to be involved in modern slavery, human trafficking and forced or compulsory labour.
- We will incorporate any relevant procedures into existing Company policies and Colleague Handbooks to inform Colleagues of the process to follow where instances of modern slavery and human trafficking are suspected and to raise awareness of the issue across the Buzz Bingo workforce.
- We have an independent, external whistleblowing helpline called SeeHearSpeakUp that allows Colleagues to report any concerns about modern slavery and human trafficking, or indeed any wrongdoing in the workplace in a confidential manner.

## Related Documents

In order to comply with the objectives of the Modern Slavery Act 2015 (“the Act”), the Company maintains a suite of policies and procedures which are reviewed as a minimum of annually, unless mandated by business or regulatory change. These documents describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- **HR Policy** – this policy has been designed with full compliance with all relevant employment legislation including the Equality Act 2010.
- **Modern Slavery and Human Trafficking Policy** – overarching policy designed to meet the objectives of the Modern Slavery Act 2015 and Buzz’s approach to mitigating the risks posed.

- **Whistleblowing Policy** (including 'Speak Up') – Buzz's policy which outlines the ability for all employees to confidentially contact an external independent facility should they have any concerns.
- **Colleague Code of Conduct** – sets out the reasonable expectations of our colleagues to meet the objectives of the Act.
- **Anti Bribery and Corruption Policy** – We are committed to the highest standard of ethical conduct, openness, probity, and accountability. We require all employees to act honestly and with integrity at all times and to safeguard the resources that they are responsible for.
- **Recruitment /Selection and Agency Workers** – ensures that all our prospective employees are legally entitled to work in the UK, safeguards them from any abuse, forced compulsory labour or coercion once in employment and that they are at least the current National Minimum / National Living Wage. This also ensures that the Company only uses reputable employment agencies to source labour and the practices of any agency used are always verified before accepting workers from that agency. Agency workers are provided with the same training as that provided to employees.
- **Bullying and Harassment** – We take a zero-tolerance approach to all forms of discrimination, harassment, bullying or victimisation and it is against our Company policy for any employee, or third party, to discriminate against, harass, bully, or victimise another employee, a customer, or any other person in any way. We have a strict way of dealing with such incidences, which are set out in our Harassment and Bullying Policy, our Disciplinary Policy, and the Employee Handbook. This rigour prevents any form of coercion or forced compulsory labour within our business.
- **Equal Opportunities, Diversity and Inclusion and Dignity at Work** – We are committed to preventing any form of servitude in our employment practices. We provide equal opportunities at all stages of the recruitment and selection process and in employment, treating people fairly and equally eliminating all forms of unlawful discrimination. We recognise the right of all employees or agency workers to be treated with dignity and respect in the workplace so that they can be at their best regardless of a protected characteristic or perceived protected characteristic. We also recognise the right to be paid equal pay for jobs of equal value.
- **Equality Diversity and Inclusion** – We are committed to encouraging equality, equity, diversity, inclusion amongst our people and eliminating unlawful discrimination. Our aim is to be truly representative of all sections of society and our customers and for all employees to feel able to be themselves and perform at their best. We provide training for all employees to educate and raise awareness and to set out the behaviours we expect of our people in support of our commitment to make sure our culture is as inclusive as possible.
- **Supplier/Procurement Code of Conduct** – is provided to all our third-party suppliers to ensure their own business practices meet the objectives of the Act, and expectation to do so is outlined in their contract with the Company.
- **Supplier Due Diligence** – is conducted as part of onboarding checks covering the Act, as well as other areas of due diligence (for example, data protection, information security and gambling regulatory provisions)

- **Employee Handbook** – outlines the expectation of employees to adhere to the Company's policies and procedures in relation to their employment, with failure to do so being a disciplinary offence which may result in dismissal.

## Training and Awareness

We require all relevant managerial employees to complete mandatory training on modern slavery. This statement is issued to those relevant employees as and when updated to ensure that they have a full understanding of the Company's position, recognise when there might be a risk posed to the Company and the steps to take if modern slavery or human trafficking is suspected.

We are also committed to raising awareness of modern slavery issues across the remainder of the workforce by displaying posters across our premises and having a Modern Slavery and Human Trafficking section within our employee handbooks.

Line managers are responsible for signposting relevant policies and procedures during a new colleague's induction to the Company. Employees are requested to read all policies and procedures relevant to their employment with the Company and as such, the Company makes all documents available via the Company's intranet service.

## Commitments

1. We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
2. All our supplier contracts warrant that they comply with the Modern Slavery Act 2015 and set out the minimum standards required to combat modern slavery and trafficking.
3. 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.
4. 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.
5. 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.
6. 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.
7. If we find that other individuals or companies working on our behalf have breached the provisions of this statement or the supporting policy, we will make sure that we take

appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

8. We will ensure that consideration of modern slavery and human trafficking risks and prevention are included in our overall policy review as an employer and the procurer of goods and services.

Following a review of the effectiveness of the steps we took in financial year 2022 and 2023, we intend to take the additional following steps in financial year 2024 so that we can identify any issues and ensure ongoing compliance with the Act:

- Create a dedicated Modern Slavery and Human Trafficking Working Group (“The Working Group”) with representatives from our Risk & Compliance, Procurement and Human Resources functions to ensure that there is ongoing monitoring of and compliance in our supply chain.
- The Working Group will meet on a half-year basis to ensure ongoing compliance with our commitments.
- We are in the process of creating an Environmental Social Governance Group within our Executive team for defining what our social responsibility strategy will be, which will include modern slavery and human trafficking and be linked to our new Equality Diversity and Inclusion Policy.
- We will continue to review our training content to ensure that our employees have a good understanding of modern slavery and human trafficking so they can mitigate risk and report any grounds for suspicion.

This statement is made on behalf of Buzz Group Ltd (Buzz Bingo).

Approved by the Executive Board of Buzz Bingo (date 2024)

Dominic Mansour

Chief Executive Officer

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