

Postcode Lottery Limited

# MODERN SLAVERY STATEMENT



### INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the anti-slavery and human trafficking statement of Postcode Lottery Limited for the calendar year ending 31st December 2019.

#### Business Structure and organisation

Postcode Lottery Limited is an External Lottery Manager, operating and promoting multiple society lotteries on behalf of a range of charities and good causes. It is a private limited company incorporated in the UK, and trades under the name People's Postcode Lottery.

Postcode Lottery Limited is part of the Novamedia Group. It is a 100% subsidiary of Novamedia B.V., which is ultimately wholly owned by The Novamedia Foundation Trust (Stichting de Novamedia Fundatie).

The mission of Novamedia is ***“...to set up and operate charity lotteries all over the world to raise funds for charities and increase awareness of their work.”***

The group has been structured in order to protect this social mission, by ensuring returns are invested to achieve further social benefits, and by introducing safeguards to prevent shares from being capable of being sold to private investors for personal gain. Further detail about the safeguards in place to protect the social mission can be found at [www.novamedia.nl/about-novamedia/organisation/governance](http://www.novamedia.nl/about-novamedia/organisation/governance)

Given our social mission, we are fully supportive of measures to tackle modern slavery. Some of the charities obtaining funds through lotteries for which we are External Lottery Manager work to tackle modern slavery through matters such as protecting children from exploitation and trafficking, as well as tackling violence against women and girls.

Under Novamedia's International Development and Human Rights strategy, Postcode Lottery Limited is committed to ending abuse, exploitation, trafficking and all forms of violence and torture against vulnerable groups including women and children. In 2020, this will continue to be a focus area, working with organisations that aim to create greater public awareness and understanding of various issues regarding modern slavery.

## POLICIES

### Supplier Code of Conduct

Our standard terms and conditions incorporate our Supplier Code of Conduct. Our Supplier Code of Conduct prohibits our suppliers from using any form of forced labour. In addition, our standard contract obliges suppliers to comply with the Modern Slavery Act 2015.

Our policy is, where possible, to engage our suppliers on our standard terms and conditions or to incorporate our Supplier Code of Conduct into the supplier's terms and conditions. In 2019, we developed an updated Vendor Vetting process which has ensured that all contracts get a legal review. This has made it easier to work with suppliers at the negotiation stage to incorporate the Supplier Code of Conduct and to track the number of suppliers who have adopted the Supplier Code of Conduct. We also created a set of terms and conditions, incorporating our Code of Conduct, which are more suitable for small suppliers. To date fifty per cent of our new suppliers have agreed to our standard terms and conditions or incorporated our Supplier Code of Conduct into their terms. During 2019 we developed a procurement process for new suppliers and the Supplier Code of Conduct has been built into our baseline requirements. In 2020 we will be building on the progress made to date and looking to increase the percentage of suppliers engaged on our standard terms and conditions or who have incorporated our Supplier Code of Conduct into their terms. We will also be looking at our contract management process to obtain a greater understanding of the supplier chain in relation to compliance with the Modern Slavery Act.

### Whistleblowing Policy

In both 2019 and continuing through 2020, our Whistleblowing Policy sets out a confidential channel for our people to raise serious issues of public interest including concerns about Modern Slavery. The Whistleblowing Policy is part of a suite of policies, which all our people are required to read and accept when they join Postcode Lottery Limited.

### Due Diligence and Risk assessment

While the risks of modern slavery are likely to be low for Postcode Lottery Limited, we nevertheless recognise the potential for risk through the goods and services we procure. During 2019, our suppliers were vetted through our Vendor Vetting process. Going forward, we will continue to vet all new suppliers and will review our contract management process for suppliers in light of the Modern Slavery Act.

### Training

- In 2019 all of our people completed Modern Slavery training.
- In 2020, we aim to raise awareness of modern slavery amongst our people through further information and training sessions. In particular, we will be working with the Helen Bamber Foundation to develop training tailored for our people.
- We are also planning specialised training for our people involved in engaging suppliers.
- Some of the charities obtaining funds through lotteries for which we are External Lottery Manager have expertise in matters such as working to protect children from exploitation and trafficking. During 2020 we will look to work with such charities to inform our actions to address modern slavery, and help such charities create greater public awareness of modern slavery issues.

### MEASUREMENT

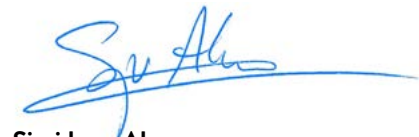
#### In 2019 we have achieved the following:

- All our people completed Modern Slavery Training
- 50 % of new suppliers were engaged on our standard terms and conditions (which incorporates our Supplier Code of Conduct) or incorporated our Supplier Code of Conduct into their supplier contracts
- A new Vendor Vetting process was implemented which ensured all contracts were reviewed and where possible, signed up on our standard terms and conditions
- We began working with the Helen Bamber Foundation who have expertise in tackling issues relating to modern slavery to help inform our approach, and in particular to help develop our training for 2020
- Our people had the opportunity to attend Team Talks on tackling trafficking in Nigeria presented by the Thomson Reuters Foundation
- There was increased funding for charities who have relevant expertise in tackling modern slavery through the lotteries for which we act as External Lottery Manager.

#### In 2020 we will aim to achieve the following:

- All our people to complete Postcode Lottery specific Modern Slavery Training
- To increase the number of our suppliers who are engaged on our standard terms and conditions or who have incorporated our Code of Conduct into their agreement with us.
- To improve our contract management process and in particular to increase understanding of the supply chain.
- To continue working with relevant charities who have expertise in tackling issues relating to modern slavery and who obtain funds through the lotteries for which we act as External Lottery Manager, in order to help inform our approach, and to support them in raising public awareness of the issues

Approved by the Board on 19th December 2019  
For and on behalf of Postcode Lottery Limited

A blue ink signature of Sigrid van Aken, written in a cursive style.

**Sigrid van Aken**

Director  
Postcode Lottery Limited

