

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 31<sup>st</sup> December 2021.

### 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. 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 <https://www.novamedia.nl/who-we-are/organisation>

Given our social mission, we are fully supportive of measures to tackle modern slavery. Some of the charities and good causes 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 2022, 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

#### Modern Slavery Policy

In 2021 we introduced a Modern Slavery Policy which pulled together the relevant sections of our policies and procedures relating to Modern Slavery such as our Whistle Blowing Policy and our recruitment procedures. This Policy has been made available to all staff and will form the basis of our Modern Slavery Hub in 2022. The Modern Slavery Policy also provides key information on how to identify Modern Slavery, and who to report any suspicious activity to within the business.

#### 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. The updated Vendor Vetting process 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 have also improved our process for engaging on our terms and conditions, incorporating our Code of Conduct, which are more suitable for small suppliers. In 2021 ninety-two 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 2021 we have continued to improve our procurement process for new suppliers and built on our baseline requirements. In 2022 we will be looking to maintain the percentage of suppliers engaged on our standard terms and conditions or who have incorporated our Supplier Code of Conduct into their terms.

On 1 January 2022 we introduced the use of a third-party supplier, RightsDD Act, to help assess our suppliers for slavery risk.

#### Whistleblowing Policy

Our Modern Slavery Policy sets out who any concerns regarding possible Modern Slavery should be reported to. In addition, in 2021 and continuing through 2022, our Whistle blowing Policy also sets out a confidential channel for our people to raise serious issues of public interest, including concerns about Modern Slavery. The Whistle blowing Policy is part of a suite of policies, which all our people are required to read and accept when they join Postcode Lottery Limited. The Whistleblowing Policy is also flagged in our Dignity at Work training which has been rolled out to all of our people.

#### 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 2021, 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. We will also utilise the risk assessments available through the RightsDD Act system.

#### Training

- In 2021 all of our people completed Modern Slavery training.
- In 2021 we worked with the Helen Bamber Foundation who developed training tailored for our people. The training was delivered through a video presentation.
- In 2021 we used the feedback from the 2020 sessions to build our 2021 training and to engage our people in raising awareness.
- In 2021 we also made available enhanced training for our people involved in engaging suppliers.
- In 2022 we will be launching our Modern Slavery Hub which will be available on our company intranet.
- 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 2022 we will continue 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 2021 we have achieved the following:

- All our people completed Modern Slavery Training.
- 92 % 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.
- We worked with the Helen Bamber Foundation who have expertise in tackling issues relating to modern slavery to help inform our approach, and in particular to develop and deliver our training for 2021.
- 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 2022 we will aim to achieve the following:

- To continue working with the Helen Bamber Foundation in developing our understanding of Modern Slavery and in creating relevant training for our people.
- All our people to complete Postcode Lottery specific Modern Slavery Training.
- Provide enhanced Modern Slavery Training to our people involved in engaging new suppliers.
- To maintain 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 introduce the use of a third-party supplier, RightsDD Act, to help us manage the modern slavery risks of working with third party suppliers.
- To launch a Modern Slavery Hub on our company intranet.
- 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 31 January 2022  
For and on behalf of Postcode Lottery Limited



**Sigrid van Aken**

Director  
Postcode Lottery Limited

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