

# JACKPOTJOY PLC MODERN SLAVERY ACT 2015 TRANSPARENCY STATEMENT JUNE 2017

This statement is made by Jackpotjoy plc in accordance with section 54 of the Modern Slavery Act 2015 (the **Act**) on behalf of itself and those companies within the Jackpotjoy group of companies (the **Jackpotjoy Group**) which are subject to the reporting requirements under the Act for the financial year ending 31 December 2016. The statement sets out the steps that Jackpotjoy plc has taken and intends to take to ensure that slavery and human trafficking is not taking place in its business or in its supply chains.

### Our Group, Our Ethics and Values

Jackpotjoy plc is an online gaming holding company that provides wagering-focused entertainment to a global consumer base. It conducts its online gaming operations through the Jackpotjoy Group.

The Jackpotjoy Group was formerly run by The Intertain Group Limited (Intertain), a Canadian company. After its incorporation in July 2016, Jackpotjoy plc became the parent company of Intertain (and its subsidiaries) in January 2017 following a reorganisation transaction involving a share-for-share exchange. For more information on the history of the Jackpotjoy Group and the reorganisation see Part 2 of the prospectus published by Jackpotjoy plc on 20 January 2017 and which is available at http://www.jackpotjoyplc.com/investors/jackpotjoy-plc-prospectus/.

The Jackpotjoy Group is committed to conducting its business with complete integrity, and in a manner which ensures compliance with all applicable laws.

In particular, the Jackpotjoy Group seeks to provide, and ensure that its third-party partners provide a safe, responsible and trusted online gaming environment through compliance with industry best practice. The Jackpotjoy Group takes responsible gaming seriously and has a Compliance department to prepare and maintain ethical and social policies for the Jackpotjoy Group.

Further, the Jackpotjoy Group's operations have been certified by regulated bodies, including Gamcare, that seek to promote a responsible approach to gaming, and meet its code of practice. This code requires operators, amongst other things, to provide customer-led payment limits and controls for session play (for casino games); to provide self exclusion options and responsible gaming content and sources of help for all customers; to verify the age of all sign-ups; and to provide customer service teams with training on problem gambling.

# **Our Business**

Jackpotjoy plc's online gaming operations are conducted through its subsidiaries Jackpotjoy Operations Ltd., Dumarca Holdings Limited, Mandalay Media Limited and Cryptologic Operations Limited. These subsidiaries offer bingo and casino games to its customers through brands which include Jackpotjoy, Starspins, Botemania, Vera&John, Costa Bingo and InterCasino.

The Jackpotjoy Group offers real-money online bingo-led entertainment as well as social gaming. For the Jackpotjoy Group's real money offerings, players bet real money and realise real money wins and losses. In contrast, its social gaming offerings typically involve players playing virtual gambling-like games for free, with the option to purchase additional credits to extend playing time or obtain other benefits for real money.

The Jackpotjoy Group's operations are primarily focused on, and in 2016 over 80 per cent. of the Jackpotjoy Group's revenues were derived from, the UK and Northern Europe, in particular Sweden. Currently, the Jackpotjoy Group's international operations are licensed or operate through the licences of third-party service providers in Malta, Gibraltar, the UK, Spain and Denmark. Malta and Gibraltar are both key interactive gaming

jurisdictions with comprehensive interactive gaming policies and regulatory frameworks. As a result, Malta and Gibraltar host and licence many of the industry's largest operators. For more information about our business see <a href="http://www.jackpotjoyplc.com/our-businesses/overview/">http://www.jackpotjoyplc.com/our-businesses/overview/</a>.

## **Our Supply Chains**

The Jackpotjoy Group's brands operate through in-house and third party online gaming platforms. Our other suppliers primarily relate to typical services used in the general operation of our business.

We carry out due diligence on new suppliers as appropriate, and our approach is to seek to establish and maintain relationships with our suppliers with a view to ensuring that they act in accordance with applicable laws, our values and ethical business principles.

## **Policies and Governance**

The Jackpotjoy Group has recently adopted a group-wide policy relating to slavery and human trafficking which confirms that the Jackpotjoy Group opposes all forms of slavery and human trafficking, and is committed to taking steps to ensure that these do not occur in its business or in its supply chains.

## **Due Diligence and Risk Assessment**

In mid 2017, Jackpotjoy plc commenced the process of reviewing its business and supply chains to identify and assess the risk of slavery and human trafficking, including any measures already in place to address such risks and any additional measures that may be warranted in light of the review.

As a business in the online gaming sector, we operate in a heavily regulated industry and already have a number of internal policies in place that serve to regulate our conduct.

Our due diligence plan envisages the following steps:

- a review of our existing supply chains and the identification of suppliers to the Jackpotjoy Group which present a risk of modern slavery; and
- the development of a supplier questionnaire to assess the risk of slavery and human trafficking in the business and supply chains of a proposed supplier providing services from higher risk territories (or otherwise deemed to be higher risk) prior to entering into any new relationships with such suppliers. This questionnaire may also be applied prior to the renewal of existing supply contracts with suppliers providing services from higher risk territories (or otherwise deemed to be higher risk).

### **Communication and Awareness**

This statement will be available on the Jackpotjoy plc website and communicated to relevant staff of Jackpotjoy plc and those companies within the Jackpotjoy Group which are subject to the reporting requirements under the Act, to promote an understanding of the risks of modern slavery in our business and supply chains.

(signed) "Andrew McIver"

Director of Jackpotjoy plc for and on behalf of Jackpotjoy plc and the Jackpotjoy Group