

## MODERN SLAVERY ACT TRANSPARENCY STATEMENT

### Introduction

Section 54 of the Modern Slavery Act 2015 requires large companies operating in the UK to prepare and publish a Modern Slavery statement. The statement aims to set out the steps the company has taken that year to identify and eradicate modern slavery from its business and its supply chain. Bally's Corporation acquired Gamesys Group Plc on 1<sup>st</sup> October 2021, and as a result of this the company now operates in the UK, offering an online only service. Whilst integration and standardisation of the enlarged Group's policies and process is underway, the approach to modern slavery noted here is that of Gamesys Group Ltd and its subsidiaries (collectively "Gamesys"). This covers Bally's Corporation's operations in the UK, Europe and Asia.

### Overview

As an operator in a highly regulated industry, legal and regulatory compliance are at the forefront of business operations.

Gamesys is committed to preventing modern slavery and human trafficking and we require compliance from our employees and suppliers with all applicable laws and regulations, including the Modern Slavery Act.

Our commitment to preventing forced, compulsory or child labour is an integral part of our human rights approach, which is aligned to the UN Guiding Principles on Business and Human Rights. As a multinational online service operator employing, and using a supply chain of, predominantly skilled workers, our overall risk of modern slavery is low. Regardless, we operate a number of policies and controls to minimize this risk.

### Our Organisation

Gamesys Group Ltd is the UK registered subsidiary of Bally's Corporation that provides online gambling entertainment to a global consumer base. Through its subsidiaries, Gamesys Group Ltd currently offers bingo and casino games to its players using brands which include Jackpotjoy, Virgin Games, Botemania, Vera&John, Megaways Casino, Rainbow Riches Casino and Monopoly Casino.

### Assessing and Managing Risk

Modern slavery related risks, along with other human rights risks, have been assessed by a Human Rights Impact Assessment. These assessment involved a number of functional representatives across the business, including Legal, People, Sustainability and Procurement and were facilitated by an external expert.

Factors considered in the analysis of the modern slavery risk assessment included: countries of operation and their status on the 2018 Global Slavery Index, the nature of work for employees and the supply chain (pre-dominantly skilled), local legislative requirements, company policies (e.g., payment of the Real Living Wage in the UK) and supply chain categories.

Overall, the risk of modern slavery occurring in both our business, and our supply chain was deemed to be low.

### Our Policies and Controls

Gamesys have a number of modern slavery-related policies and procedures in place, which include:

- A commitment to minimizing the risk of forced, compulsory or child labour and to publicly reporting any breaches. No such incidents occurred in 2020.
- People Team policies and procedures which require age verification of employees.
- Whistleblowing Policy which details our procedures for anonymously and confidentially raising any suspected policy or legal breaches (via a third party hotline), and our approach to protecting whistleblowers.

In respect of Gamesys employees, our Employee Code of Conduct makes clear to all employees the actions and behaviour expected of them when representing the organization. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.

### **Our Supply Chain and Due Diligence**

Our supply chain sectors primarily relate to typical services used in the general operation of our business such as information technology, marketing and professional services such as payment service providers.

Gamesys work with reputable third parties across the various sectors that we engage in. Where appropriate we include contractual commitments and protections in our agreements with our suppliers where necessary.

Within the Group we have adopted a Delegation of Authority framework thereby ensuring appropriate Board oversight on contracts as and when required.

### **Training**

Modern Slavery eLearning training is available to all Gamesys employees and an overview is provided to all new joiners as part of their induction.

### **Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending 31/12/2021 for Bally's Corporation. This statement has been formally approved by the Board of Directors of Bally's Corporation and is endorsed by Lee Fenton, Group Chief Executive Officer.

Lee Fenton



Chief Executive Officer

Bally's Corporation

15.12.2021