

Modern Slavery Statement

Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and is applicable to tombola Ltd and all its subsidiaries and branch offices as our statement on slavery and human trafficking for the financial year 1 May 2020 to 31 April 2021.

tombola Ltd is committed to identifying and improving the practices to combat Modern Slavery and Human Trafficking. We take a zero-tolerance approach to Modern Slavery and Human Trafficking within our operations and hold our supply chain to the same standard.

About us

tombola Ltd is a trading name for tombola™

tombola Ltd and its subsidiaries (tombola (International) PLC and tombola International Malta) have over 700 employees across the UK, Gibraltar, Malta, Spain, Italy, Denmark, and Sweden.

We are an online bingo company with our headquarters in Sunderland in the Northeast of England. We also have additional offices in Gibraltar, Milan, Madrid, and Malta. Founded in 2000, we produce original bingo software and games, created by an in-house development team. tombola is one of the largest employers of game and web developers in the Northeast of England.

The fundamental strategy of the business is to create affordable, quality entertainment. It is a four-point strategy which is followed in all of our operations, including when launching new products and entering into new regulated territories.

1. Invest in the brand
2. Differentiate the product
3. Emphasis on community
4. Value for money and affordable approach

This strategy is driven by our Values of:

- Player first
- Innovate
- Do the right thing

The above enables tombola to achieve our business objectives of growing our community of players and improving player retention, whilst delivering impactful content and giving players a great experience. We aim to expand geographically and ensure tombola is a great place to work for our employees.

Our stance on Modern Slavery

We are committed to ensuring that we play our part in eradicating the issue of Modern Slavery and Human Trafficking. The measures we take as a business ensure that we tackle acts of modern slavery from within our business and through supply chains.

Policies and Training

We provide training to staff, and have a number of policies within our online portal to support this, which are available to our staff at all times.

These policies include, but are not limited to:

- HR Fair Processing Notice
- Group Privacy Policy
- Information Security
- Health and safety
- Grievance Procedure
- Whistleblowing Policy
- Internal Monitoring & Governance Policy
- Tombola Integrity policy
- Outsourcing and Vendor Management Policy

In 2021 – 2022, we are planning to introduce companywide e-learning on the subject of Modern Slavery and Human Trafficking.

Assessing and Managing Risk

Due to the nature of our business, we believe there is a low risk of slavery and human trafficking in our business and supply chains. At tombola, 100% of employees are directly employed and external agencies are not utilised which ensures visibility and assurance in onboarding and recruitment. Tombola also ensures that they pay a competitive living wage to all employees. In addition, the cost of living is reviewed on an annual basis.

As a multinational operation, we understand there is additional risk when expanding into other territories. When considering whether to expand geographically, a risk assessment is

completed and tombola will only operate in regulated markets and with reputable third parties within those territories.

In 2021, we have implemented a Risk and Audit Compliance Committee (RACC) which meet regularly to review risks identified via the company risk register and seek to mitigate these risks. Modern Slavery is now included in the Company Risk Register and will be reviewed in RACC meetings each quarter to ensure related risks are identified and addressed promptly.

Our Supply Chains and Due Diligence Management

Due to the nature of our business, we believe there is a low risk of slavery and human trafficking in our supply chains. As part of our initiative to identify and mitigate risk in our business we are taking proactive measures to understand our suppliers and have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers
- Monitor supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply, we conduct regular due diligence in order to determine the measures taken by our suppliers to combat slavery and human trafficking in their own business and in their own supply chain.

In keeping with our overall risk management procedures, we recognise the need to further our endeavours concerning Know Your Business Partner (KYBP), or corporate due diligence.

Prior to entering into any formal agreement with a new outsourced third-party supplier an appropriate third-party a vendor classification must be assigned, and the relevant checks must be completed and approved. A risk assessment shall be carried out prior to any 3rd party engagement. This is done to identify any potential risks of the outsourced function/service and the potential effects that outsourcing may have on such function/service (such as operational, reputational, concentration risk, regulatory and financial risks.)

Monitoring and Measuring Effectiveness


In 2021/2022, our internal Audit and Assurance function will audit current activities and measures in place relating to Modern Slavery and Human Trafficking to ensure continued compliance and drive future improvement. The RACC will continue to review and discuss

identified risks to help ensure the measures in place remains effective in eliminating risk of Modern Slavery and Human Trafficking.

Annual Approval

Tombola Ltd. will conduct an annual review of our modern slavery statement.

This statement was written in accordance with the requirements under section 54(1) of the Modern Slavery Act 2015 for tombola Limited and its subsidiaries, and has been formally approved and endorsed by Phil Cronin, CEO tombola Ltd on 31 August 2021

A handwritten signature in black ink, appearing to be 'Phil Cronin', with a horizontal line underneath it.