

MODERN SLAVERY STATEMENT

NOVOMATIC UK LIMITED

For 2020

Modern slavery is a crime and an abuse of human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. Novomatic UK Limited (referred to as “we”, “us” or “our”) have a zero tolerance to modern slavery of any kind and are committed to acting ethically in all our business relationships. We aim to comply with the Modern Slavery Act 2015 and expect our suppliers and their supply chains to do the same. Our financial year runs in parallel with the calendar year. This statement covers the year 2020 during which our B2C businesses were unable to trade or were restricted in our hours of trade for a large portion of the year due to government imposed restrictions and our B2B operations were consequently also severely curtailed.

Our Business

Our main business is as a holding company. In 2020 our trading subsidiaries were Luxury Leisure, RAL Ltd., Queensgate Leisure (Bradford) Ltd. (the Arcade Business) and Novomatic Gaming UK Ltd. (NGUK). We also have a smaller commercial property investment business. Our main suppliers are of professional services, particularly legal and accounting services.

Our subsidiaries almost exclusively operate in the highly regulated gambling sector environment. They are all approved and licensed by the GB Gambling Commission. Additionally, the Arcade Business is licensed and regulated by councils throughout the country. The Arcade Business also operates a smaller UK tanning salon business in what is also a regulated sector.

As part of the Novomatic global group of businesses we adhere to the Novomatic global Code of Conduct. We support the UN Charter of Human Rights and the Work and Social Standards set out by the ILO and the addressing of misconduct in any area of human rights within our business relationships.

Our Policies

The main relevant policies are relevant to monitor and reduce the risk of modern slavery occurring within our business or supply chain: -

- This modern slavery statement;
- Whistle-blowing policy;
- Bribery and anti-corruption policy;
- Employee screening policy;
- Equality and diversity policy;
- Business partner due diligence policy and compliance screening; and
- Novomatic Group Code of Conduct.

Our Supply Chain and Risk Assessment

Neither we nor our above mentioned subsidiaries have intricate supply chains. The vast majority of supplies to our Arcade Business are from UK based, regulated businesses who are well established and known to us. Any overseas manufacturers of main products are either Group companies or similarly well established and known to us. Suppliers of equipment to our tanning business are well established UK companies; with manufacturers based in the UK, or in the case of one range of products, by a single associated company in Germany. Our supplier of tanning lotions is based in the UK and the manufacturer is in Florida.

Suppliers to NGUK are mainly of gaming machines and gambling related products/components from Group companies and include overseas members of the Novomatic group, which are licensed by the Gambling Commission as required. Our other suppliers are providers of components, services or works to support day-to-day management of our manufacturing facility.

Suppliers to Novomatic UK Ltd itself are UK based professional service providers and are well established and known to us. As such we believe our exposure to the risks of modern slavery is low, but we are alert to the possibility that such practices can exist anywhere.

Employment Practices

We adopt robust recruitment processes and have a comprehensive suite of employee responsibility policies. All our employees have the necessary documentation to legally work in the UK, are paid at least the minimum living wage and have reached school leaving age.

Education and Training

We will communicate this statement to all relevant employees to ensure a high level of understanding of the risks of modern slavery in our business and supply chain.

We raise awareness amongst our staff of the risks of modern slavery in our business and supply chains and will continue to develop our approach.

Any suppliers considered at risk will be made aware of this policy and required to demonstrate compliance.

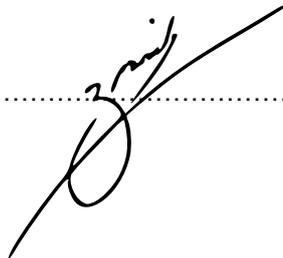
Our directors and senior management take responsibility for implementing this policy statement and its objectives and shall continue to provide adequate resources and investment to ensure that modern slavery is not taking place within the organisation nor within its supply chain.

Approval

This statement has been approved by our board of directors who will review and update it as necessary on an annual basis.

Signed: Zane Mersich

Chief Executive Officer
March 2021

A handwritten signature in black ink, appearing to read 'Zane Mersich', is written over a horizontal dotted line. The signature is stylized and extends above and below the line.