

Sports Information Services (Holdings) Limited

Modern Slavery Act 2015 Statement 2021-22

Introduction

This statement is issued by the directors (“**the Board**”) of Sports Information Services (Holdings) Limited. It sets out the approach to be adopted by all companies within its group (“**the Group**”) to understand all potential modern slavery risks related to Group businesses and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its own businesses and their supply chains. This statement relates to actions and activities during the financial year 1 April 2021 to 31 March 2022.

We recognise that we have a responsibility to take measures to build a robust approach to slavery and human trafficking. We are committed to preventing slavery and human trafficking in the Group’s corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. We have maintained this commitment throughout the coronavirus pandemic.

Organisational structure and supply chain

The Group is a provider of content services to retail and online betting operators globally.

- The Group has over 450 employees worldwide.
- Our operations are conducted primarily in the United Kingdom, with offices in London, Milton Keynes and Manchester.
- We have operating subsidiaries in Ireland and the United States of America.
- We have sales operations based in various territories in Europe and, later in 2022, Latin America.

We comply with all applicable employment legislation relating to the engagement of employees, including pay and conditions, and we invest in supporting the health and wellbeing of our colleagues, having recently been awarded a ‘We Invest in Wellbeing’ Silver award through Investors in People during 2021.

This statement endorses the United Nations Guiding Principles on Business and Human Rights and supports the principles contained within the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

The Group supply chain, in summary, is primarily made up of:

- Technical service providers (including network operators, software companies, professional services and equipment providers);
- HR organisations to support the recruitment, development, and wellbeing of our workforce, including some recruitment abroad;
- Facilities support services to run and maintain our UK based offices to meet Health & Safety obligations, which include cleaners, security services and maintenance services; and
- Professional services providers such as auditors, consultants, developers, and legal advisors.

We expect our supply chain to support and adhere to the Group's commitment to our policy.

Relevant Group policies

The Group values the cohesion and dedication of its teams across all its areas of operation and strives to maintain this positive environment by communicating key policies during the recruitment process and subsequently via its management processes.

The Group already has in place a number of policies which we consider will either assist in our identification of modern slavery risks and/or help to prevent slavery and human trafficking within our operations:

- A 'Whistle blower policy' for our people, which sets out the key issues and how we should respond, including a process for raising concerns internally to allow potential referral by appropriate colleagues to Modern slavery Helpline, if necessary.
- A grievance policy allows for raising and managing complaints raised by people inside and/or outside the Group.
- Employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace.
- Robust recruitment processes in line with relevant employment laws.
- Market-related pay and rewards reviewed annually.
- Wellbeing strategy and initiatives to support our people's physical and mental wellbeing and lifestyle choice.
- Mandatory training modules for essential legislative understanding and awareness.

- A 'Vendor Management & Procurement policy' for how we deal with suppliers making clear the standards we expect, vendor performance, and contract management principles.

Due Diligence Processes

The Group acknowledges that while we have a pre-contract Due Diligence policy that meets the requirements of anti-bribery and corruption legislation and AML regulations (to the extent applicable to the Group's activities) there is more we can do in our due diligence processes to address modern slavery risks.

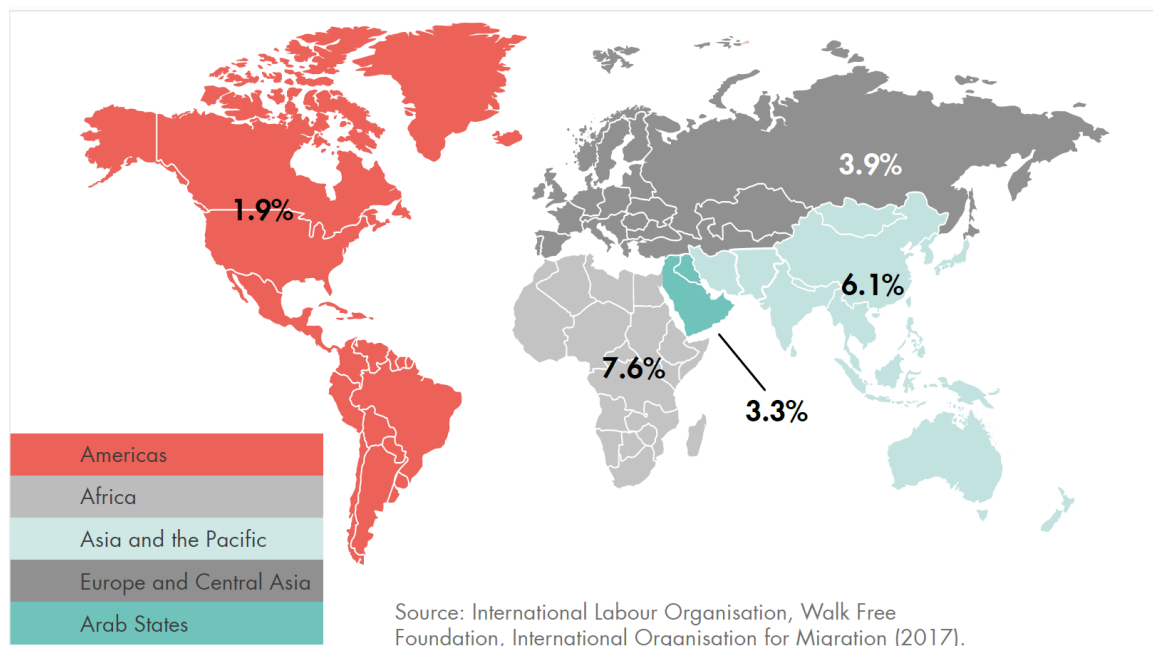
While already conducting due diligence on third party suppliers being added to our Approved Supplier list, we recognise that further attention must be given to how in our supply chain we manage ethical and moral questions, compliance with legal obligations, and the risks presented by failure to manage these issues appropriately.

An internal audit conducted during 2021 identified that improvements were required in the following areas:

- Our pre-contractual due diligence during the procurement cycle;
- The need to increase the frequency of contractual & performance governance of high value, higher risk suppliers (Tiers 1 & 2);
- Enhance processes within Contract Management to identify and mitigate poor contractual performance against obligations connected to ethical sourcing; and
- Improve policy awareness and training to our colleagues and supply chain.

Establishing our Related Risk Profile

The International Labour Organisation (ILO), International Organisation for Migration (IOM) and Walk Free Foundation estimated the number of people in modern slavery per 1,000 people by region. These metrics are used as a basis for assessing the potential geographic regions of risk in the Group's supply chain.



Further to this, and in accordance with the World Population Review’s Global Slavery Index, the following section outlines the Group’s approach, actions, and considerations around risk in assessing the level of risk exposure in our supply chain.

As regards particular activities and countries that are classified as higher risk to slavery or human trafficking, modern slavery is perceived to be a higher risk in sectors where work is:

- Labour intensive
- Unskilled
- Irregular
- Supplied through recruitment intermediaries
- Informal
- Geographically remote
- Outsourced to third parties (e.g., cleaners and security staff)
- Undertaken in lower tiers of the supply chain with less direct oversight and no contractual relationship.

<https://worldpopulationreview.com/country-rankings/countries-that-still-have-slavery>)

Further to the consideration of specific regions the following represent the top 10 countries with the highest prevalence of modern slavery (by total number of slaves) - *Global Slavery Index 2018*:

1. India	7,989,000
2. China	3,864,000
3. North Korea	2,640,000
4. Nigeria	1,386,000
5. Iran	1,289,000
6. Indonesia	1,220,000
7. Congo (DR)	1,045,000
8. Russia	794,000
9. Philippines	784,000
10. Afghanistan	749,000

Our Approach to Risk Assessment

Based on the STRT scoring guide from www.Socialresponsibilityalliance.org the Group will assess suppliers as part of its pre-contractual due diligence process, and Tier 1 and Tier 2 suppliers frequently, using the risk assessment approach outlined below.

After assessing the level of 'perceived inherent risk' (as defined below) the slavery and human trafficking risk scoring methodology aligns suppliers into four different categories, with the following interpretations.

No perceived inherent risk - Suppliers operating in a low-risk industry, low-risk geography with a low-risk workforce.

Perceived inherent risk - Suppliers operating in a high-risk industry, high-risk geography, and/or with a high-risk workforce with various levels of controls in place around policies, practices, and procedures.

- No indication of inherent risk **low-risk (no perceived inherent risk)**
- Adequately control risk **low-risk (adequate risk control)**
- Partially control risk **medium-risk**
- Do not adequately control risk **high-risk**

For ease of reference, please see below for an overview of these four risk categories and their meaning:

		PERCEIVED INHERENT RISK	
		Yes	No
RISK CONTROL	Adequate	Low-Risk (Adequate Risk Control)	Low-Risk (No Perceived Inherent Risk)
	Partial	Medium-Risk	Low-Risk (No Perceived Inherent Risk)
	Inadequate	High-Risk	Low-Risk (No Perceived Inherent Risk)

Based on this approach, and prior to completing our focused analysis across Tiers 1 and 2, the initial assessment of the overall risk within the Group is considered low.

Suppliers considered to be within the following categories will be placed in Tiers 1 and 2 for more frequent review and assessment as they are considered areas where a higher degree of risk applies within the Group supply chain:

- Cleaning (outsourced) with limited events of catering and hospitality
- Manufactured technology imports from China / Malaysia region

Due Diligence Approach

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence for new suppliers and reviews of existing suppliers includes the following elements:

- Mapping the supply chain risk broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Enhancing our detailed processes for new vendors to identify potential risk levels and complete more detailed Due Diligence for any perceived as high risk, based on:
 - Evaluating the modern slavery and human trafficking risks of each new supplier dependent on their country of origin and/or supply route and the higher risk product sets considered in the Global Slavery Index.
 - Placing higher risk vendors into Tier 1 or Tier 2 depending on the perceived level of risk and the broader nature of risk

- All contracted vendors within Tiers 1 and 2 will have an annual contract review to include risk level and performance. The Group is assessing the feasibility of an annual modern slavery questionnaire for any suppliers considered Medium to High-risk, to be conducted on or around the anniversary of a live contract.
- Conducting internal audits or assessments, focusing on slavery and human trafficking where higher risks or previous history of incidents are identified.
- Where causes for concern are identified by a supplier, we shall assist them in taking steps to improve their practices, ranging from providing advice to requiring them to implement action plans.

Supplier Selection – Risk Avoidance

The Group is expanding into new sectors and territories, and constantly changing circumstances (e.g., Covid) require flexibility and agility for adapting quickly.

Adaptation includes introducing new partners and suppliers, but while we introduce between 20 and 50 per annum the majority are for low value consumable supplies from within the UK, or specific IT applications from specialised providers.

Our aim is for every supplier accepted to complete our initial assessment form, which requires adherence to our Modern Slavery and Anti-Bribery and Corruption policies and agreement to our standard terms of business. This enables early identification of potential risk areas, which could trigger enhanced Due Diligence if required.

Where a higher value requirement leads to a full procurement exercise, the acceptance of these critical policies by commercial teams is considered a key requirement for scoring potential partners and the following would apply:

- All suppliers selected must acknowledge and accept our Modern Slavery Policy as part of the vendor onboarding process
- Further Due Diligence will be completed for vendors considered to meet one or more of the higher risk factors stated below.
- Selection of a preferred supplier through a competitive tendering process that is completed on a fair and equal scoring matrix and weighted to avoid low cost being the sole selection criteria.

- Updated standard contract terms include an obligation to adhere to modern slavery legislation.

Risk Mitigation

Current Supply Chain

Due diligence in the current supply chain is based on the level of risk initially assessed through selection.

To maximise the use of resources and manage higher value / risk suppliers with suitable priority, the following steps were taken in the last 12 months to mitigate future risk from developing within the supply chain.

- Group suppliers were categorised and structured into four Tiers
- Assuming the 80:20 rule in terms of value and considerations around criticality to the Group's performance and business continuity, with the top 20% being Tiers 1 and 2.
- Establishing a self-assessment modern slavery Questionnaire (through an external survey partner if necessary) if the supplier is considered to have a 'medium to high perceived inherent risk'.
- The existing Contract Management tool was enhanced to include the risk profile record for all contracted suppliers to enable collating and analysing of relevant data as an integral part of our continuous improvement plans.

Agency Recruitment

The Group recognised the risk of recruiting low skilled workers through recruitment agencies, so during 2021 a review of professional agencies used by the business was conducted to narrow these down to demonstrably compliant providers.

With robust and professional selection processes, along with established policies and experienced HR teams, the Group is confident of recognising higher risk individuals and suspicious behaviour. Accordingly:

- We have recently reviewed our I.T recruitment agencies and streamlined them to a PSL (Preferred Supplier List) based on experience and quality of resources. This process will continue across other recruitment sectors.
- Recruitment of temporary and low skilled workers throughout our operational sites in the United Kingdom is very limited, with recruitment involvement with agencies tending to be for more skilled resources in areas of technology/ Software development / PMO.

Continuous Improvement

An internal audit focused on Procurement and Vendor Management with several key actions recommended to contract compliance processes in general. While some may not appear specific for improving control over modern slavery the ongoing improvement of supplier control and management can only serve to identify weakness and potential vulnerability, and ultimately address them:

- Requiring key colleagues to have completed training on modern slavery by 31st December 2022;
- Developing our supply chain due diligence processes to ensure that supplier policies align with those of the Group;
- Establish the risk status and subsequently map the risk profile (one of the four categories referred to above) of all Tier 1 and 2 suppliers;
- Include training materials on intranet and a method of reporting of suspicious supplier activity on the Vendor Management & Procurement intranet page for internal colleagues;
- Tier 1 & 2 suppliers should be assessed periodically to maintain the integrity of the Group's approved suppliers in line with Group policies;
- Alignment with Group policies to be taken into account in the vendor selection process, as per the Vendor Management and Procurement Policy;
- Modern slavery warranties have been added to the Group's standard terms of business, and shall be sought where business is contracted on a counterparty's contractual terms in respect of countries or categories falling within a higher risk profile; and
- Update the Procurement Policy to include risk profiling, mandatory training requirements, and use of modern slavery questionnaires for applicable suppliers.

Compliance Effectiveness

Although much has been achieved in the last 12 months while under Covid restrictions and with many resources on furlough, we recognise there is still work to do.

Without previous data to measure the effectiveness of our approach, and having implemented our contract management tool in December 2021, we are now able to start collating and reporting on key activities to gauge the impact. Once formulated we expect to monitor and report on the following key areas:

- The number or percentage of suppliers and sub-contractors that have been vetted for ethical labour practices.
- The number and type of issues identified on screening suppliers and sub-contractors.
- Which tier of supplier has been vetted in a particular year.
- Whistleblowing - the number of reported breaches in the past year.
- Training - the number or percentage of staff trained.
- Remedial action - the instances of remedial action being needed.

We shall use the next 12 months to collate these figures with the intention to use the first year as a benchmark and aim to maintain or improve year on year.

Staff Training & Awareness

We have identified a suitable online course that will enable key current employees likely to become aware of any unethical practice or in contact with our supply chain to complete initial training that enables them to:

- Provide background on the scope of the issue;
- Teach colleagues how to identify slavery in the supply chain;
- Provide examples of red flags;
- Understand the organisation's internal reporting procedures;
- Highlight how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation within the Whistleblowing Policy;
- Identify what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and the "Stronger together initiative".

This will include those working in higher risk regions, supply chain managers, HR professionals and heads of function being required to complete one or more training sessions regularly.

For new employees and new managers, SIS is updating the induction to include an ethical supplier and awareness section to alert them to our approach and indicate how to report any potential incidents they may encounter.

Awareness-raising programme

We recognise that increasing awareness as well as training on modern slavery issues is essential to creating a zero-tolerance approach in our business.

To this end we shall be distributing flyers, putting up posters across our premises and updating internal processes and internal communications for remote employees to include circulating emails and providing access to modern slavery guidance information to help them identify potential cases.

Additional supporting material will be made available on the HR intranet portal to enhance awareness across the business, outlining:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the modern slavery Helpline (<https://www.modernslaveryhelpline.org/>).

Summary

We consider that the focus on wellbeing within our organisation is one of the elements that contribute to the effectiveness and dedication of our teams in all areas of the Group's operations. Our intention is to ensure that our core values are reflected throughout our supply chain to create a wider positive social impact and thereby minimise the risk of the Group becoming inadvertently involved in modern slavery or human trafficking practises.

Responsibility and Ownership

Responsibility for our anti-slavery initiatives is as follows:

Head of Vendor Management & Procurement:

- Risk assessments
- Selection & Onboarding Processes
- Vendor Management & Procurement Policy
- Vendor Reviews & Contractual adherence

Director of Human Resources

- Recruitment Processes and HR Policies

- Colleague wellbeing and welfare policies and procedures
- Training and awareness
- Investigations, support, due diligence around incidents raised

Board of Directors

The overall responsibility for the Group's modern slavery policy remains with the Board. The responsibility of implementing it and monitoring and reviewing its effectiveness remains with the Senior Management Team.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31st March 2022

Board approval

This statement was approved on 24th March 2022 by the Board, who review and update it annually.



Richard Ames
Chief Executive Officer

Date: 4th April 2022