

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025-2026

1. INTRODUCTION

This statement is made pursuant to s54 of the Modern Slavery Act 2015 (“Act”) and sets out the steps taken by Sports Information Services (Holdings) Limited and our subsidiaries during the financial year ending 31 March 2025 in order to prevent modern slavery and human trafficking in our business and in our supply chains.

This statement is made on behalf of Sports Information Services (Holdings) Limited (“SIS”) and all subsidiaries wherever they may be based and has been approved by the Board.

2. OVERVIEW

SIS is a leading provider of betting content and content services to retail and online betting operations worldwide. We have over 500 individuals working at SIS in various capacities and our operations are conducted primarily in the United Kingdom with offices in London, Milton Keynes and Manchester. In addition to these offices, we have operating subsidiaries in Ireland and the United States Of America.

While our offices are based in the above locations, we have sales operations based in various territories around the world.

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, which include cleaners, security services and maintenance services, to run and maintain our UK based offices to meet Health & Safety obligations; and
- Professional services providers such as auditors, consultants, developers, and legal advisers.

Commitments.

SIS are committed to upholding and respecting human rights across our operations and supply chains and conducting our relationships to the highest ethical and moral standards.

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.

3. GOVERNANCE, ACCOUNTABILITY AND OWNERSHIP

The Board has overall governance and responsibility for SIS and its subsidiaries.

The responsibility of implementing and monitoring this Group policy, as well as, reviewing its effectiveness lies with the Senior Management Team.

Responsibility for specific anti-slavery initiatives are as follows:

Head of Vendor Management & Procurement:

- Vendor 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

4. POLICIES

The Group values the cohesion and dedication of its teams across all its areas of operation and strives to maintain this positive and transparent environment by ensuring that our policies and procedures are not only communicated during the recruitment process but also on a continuing basis throughout their employment. Key Group policies that we review on an ongoing basis include:

- Whistleblowing Policy- see below for further information. Where the complaint is one which does not fall within this process, we have in place a robust Grievance Policy to allow colleagues to raise complaints.
- Anti-Sexual Harassment Policy which aims to enable employees to challenge any unwanted behaviour in the workplace, and to outline how we will deal with any complaints of sexual harassment that we receive.
- Anti-Bullying and Harassment Policy which outlines our approach to preventing and addressing bullying and harassment in the workplace and how any complaints and concerns are managed.
- Recruitment Policy which supports our commitment to fair and responsible recruitment including strength-based interviewing and what pre-employment checks are conducted which include national ID/passport checks, right to work and where applicable, background checks..
- Vendor Management and Procurement Policy and Vendor Due Diligence- These policies provide clear guidelines in the way SIS expect Vendor Management and Procurement activities to be carried out, as well as, to ensure the credibility, legitimacy and compliance of vendors. This enables SIS to effectively manage a variety of risks thereby ensuring the integrity of our supply chain.
- Business Compliance Policies including Anti-Money Laundering and Terrorist Financing, Due Diligence (of customers), Anti-Bribery and Corruption and Failure to Prevent Fraud which are reviewed annually or sooner where required.
- Employment and wellbeing policies that protect our colleagues from unfair treatment and promote a fair and inclusive workplace and promote and support colleagues physical and mental wellbeing and lifestyle choices.

DUE DILIGENCE

SIS procures goods and services from a wide range of vendors.

We ensure that at the initial review of a potential supplier, we evaluate the modern slavery and human trafficking risks dependent on their country of origin and/or supply route and the higher risk product sets considered in the Global Slavery Index. SIS currently have no suppliers based in Countries on the 'most prevalent' list of the Global Slavery Index Report 2023.

In order to ensure the credibility, legitimacy and compliance of these vendors, we undertake a check, act and review process which enables effective risk management to assure the integrity of our supply chain, minimising our exposure to risks.

To ensure that vendors can deliver the contract to the standard and quality required throughout the life of the contract, it is important to carry out robust vendor due diligence that is risk-based, not only as part of the tender process, but on an ongoing basis.

This is done utilising a number of mechanisms including but not limited to desk based searches and the use of independent third party providers to undertake checks and produce reports. A risk-based approach is taken when determining the level of due diligence to conduct on new and existing vendors.

Due diligence of the supplier (may) include, but is not limited to, areas such as jurisdictional risk, financial health and viability, Compliance and Ethics, Operational and performance measures, IT security and ESG related information. Our Supply Chain including Risk Assessment and Risk Avoidance.

Based on the STRT scoring guide from www.Socialresponsibilityalliance.org, the Group will assess suppliers as part of its pre-contractual onboarding process using the risk assessment approach and the status recorded on our contract management platform. Suppliers operating in potentially high risk sectors, countries or providing low skilled services shall be reviewed annually or more frequently if considered necessary.

At present, the majority of our vendors are low risk with little indication of inherent risk. SIS work in a niche environment with specialised vendors, so the increase in risk would relate to lower skilled areas and less specialised local vendors. SIS rarely use temporary employment agencies and all recruitment includes detailed selection protocols compliant with legislative guidelines.

The below types of vendors will be considered a higher risk and placed in Tiers 1 and 2 undergoing an annual contract review to include risk and performance:

- Outsourced lower skilled services such as cleaning service providers with limited events of catering and hospitality.
- Manufactured technology imports from China / Malaysia region.

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:

- The Group recognises the risk of recruiting low skilled workers through recruitment agencies. Following a review of professional agencies used by the business, these have been narrowed down to demonstrably compliant providers.
- We have 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.
- For our frequent recruiters, SIS have rolled out a refresher recruitment and interviewing training module.
- SIS has introduced strength-based interviewing.
- Recruitment is consistent across all resources including temporary and low skilled workers throughout our operational sites in the United Kingdom. Recruitment involvement with agencies tends to be for more skilled resources in areas of technology/ Software development / PMO.

With expansion into new sectors and territories, we ensure that there is an ongoing review of our risk and risk mitigation. While we introduce between 20 and 50 new partners and suppliers per annum, these are, in the majority, of a low value from within the UK or specific IT applications from specialised providers.

Before a supplier is approved, they must complete our initial assessment form, which requires adherence to a key spectrum of our business policies including Modern Slavery and Anti-Bribery and Corruption policies and agreement to our standard terms of business. For higher risk suppliers a Due Diligence questionnaire will also be required for a more comprehensive risk assessment.

Our contracts with vendors contain a clear clause outlining that each party to the agreement and its affiliates hold themselves to the highest ethical and compliance standards including basic human rights, not engaging in any activity, practice or conduct which would constitute an offence under anti-slavery legislation in the UK.

In addition to the above risk review and mitigation, the selection of a critical and high risk supplier is conducted 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.

TRAINING AND AWARENESS

For new employees and new managers, our induction includes Modern Slavery as a key risk and highlights our approach to colleagues. This also makes clear how concerns can be reported.

SIS have in place training for colleagues that include but is not limited to Modern Slavery and Human Trafficking, Anti-Bribery and Corruption, Sexual Harassment and Bullying and Equality, Diversity and Inclusion. These training modules aim to increase awareness of risks and deliver the key information and guidance to spot these and report them.

In addition, we send out a policy affirmation to colleagues once a month to ensure that key policies and procedures are read and understood by colleagues on an ongoing basis.

This Statement is not only published to our colleagues but is also available on our corporate website and provided to our vendors during the onboarding process and at the time of ongoing due diligence.

WHISTLEBLOWING PROCESS

Our Whistleblowing Policy promotes an open and safe environment free from the fear of retaliation. Our Policy encourages individuals to raise any concerns about ethical or legal concerns, including human and labour rights.

OUR FUTURE COMMITMENTS

Through our existing contract management tool and the recording of the modern slavery risk assigned to current suppliers, we are able to collate and analyse the relevant data as part of our continuous improvement plans. We will continue to review our onboarding forms, review process and risk profiles to ensure the continued assessment and understanding of modern slavery and human trafficking risks not just worldwide, within our industry but also within our company and its subsidiaries.

We will continue to roll out relevant training and monitor the percentage of colleagues that complete the training and its effectiveness. There have been no whistleblowing reports made regarding modern slavery and human trafficking. We will monitor this and report on the findings as required.

SIS will continue to invest in supporting the health and wellbeing of our colleagues through the work conducted by our Wellbeing Committee. In addition to the work undertaken by this Committee, we will continue to provide access to support services and engage with our colleagues in order to ensure a trusting and supporting environment.

The SMT supported by our ESG Committee we continue to demonstrate to investors, colleagues, and our customers that we are acting in the interests of the planet and society by maintaining an accurate profile of our suppliers and distributors, ensuring that our policies and procedures including but not limited to the Modern Slavery and Human Trafficking and Due Diligence policies are reviewed on an ongoing basis to ensure these align with changes in legislation, as well as, the risks assessed internally, as well as, from and by third parties.



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Richard Ames,

Chief Executive Officer

Dated: 31 March 2026

ANNEX

POTENTIAL RISK SCENARIOS: "RED FLAGS" FOR ALL JURISDICTIONS

The following is a list of possible 'red flags' that may arise during the course of business, and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to antibribery@sis.tv.

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
 - you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
 - a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
 - a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
 - a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business;
 - a third party requests an unexpected additional fee or commission to "facilitate" a service;
 - a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
 - a third-party request that a payment is made to "overlook" potential legal violations;
 - a third-party request that you provide employment or some other advantage to a friend or relative;
 - you receive an invoice from a third party that appears to be non-standard or customised;
 - a third-party refuses to put terms agreed in writing;
 - you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided; or
 - you are offered an unusually generous gift or lavish hospitality by a third party
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