

Postcode Lottery Limited

# MODERN SLAVERY STATEMENT



### Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the anti-slavery and human trafficking statement of Postcode Lottery Limited to the 31st December 2018.

### Business Structure and organisation

Postcode Lottery Limited is an external lottery manager, operating and promoting multiple society lotteries on behalf of a range of charities and good causes. It is a private limited company incorporated in the UK, and trades under the name People's Postcode Lottery.

Postcode Lottery Limited is part of the Novamedia Group. It is a 100% subsidiary of Novamedia B.V., which is ultimately wholly owned by The Novamedia Foundation Trust (Stichting de Novamedia Fundatie).

The mission of Novamedia is ***“...to set up and operate charity lotteries all over the world to raise funds for charities and increase awareness of their work.”*** The group has been structured in order to protect this social mission, by ensuring returns are invested to achieve further social benefits, and by introducing safeguards to prevent shares from being capable of being sold to private investors for personal gain. Further detail about the safeguards in place to protect the social mission can be found at <https://www.novamedia.nl/about-novamedia/organisation/governance>

Given our social mission, we are fully supportive of measures to tackle modern slavery. Some of the charities obtaining funds through lotteries for which we are External Lottery Manager work to tackle modern slavery through matters such as protecting children from exploitation and trafficking, as well as tackling violence against women and girls.

Under our International Development and Human Rights strategy, Postcode Lottery Limited is committed to ending abuse, exploitation, trafficking and all forms of violence and torture against vulnerable groups including women and children. In 2019, this will continue to be a focus area, working with organisations that aim to create greater public awareness and understanding of various issues regarding modern slavery.

### Policies

Supplier Code of Conduct:

Our standard terms and conditions incorporate our Supplier Code of Conduct. Our Code of Conduct prohibits our Suppliers from using any form of forced labour. In addition, our standard contract obliges Suppliers to comply with the Modern Slavery Act 2015.

During 2018, our policy was, where possible, to engage our Supplier's on our standard terms and conditions or to incorporate our Code of Conduct into our Supplier's terms and conditions. In 2019, we will continue with this policy and are developing an updated Vendor Vetting process which will make it easier to track our progress. We will also create a set of terms and conditions, incorporating our Code of Conduct, which are more suitable for small suppliers.

For further information, contact [communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)

### Staff Whistleblowing Policy

In both 2018 and continuing through 2019, our Staff Whistleblowing Policy sets out a confidential channel for raising serious issues of public interest including concerns about Modern Slavery. The Whistleblowing Policy is part of a suite of staff policies, which all staff are required to read and accept when they join Postcode Lottery Limited.

### Due Diligence and Risk assessment

While the risks of modern slavery are likely to be low for Postcode Lottery Limited, we nevertheless recognise the potential for risk through the goods and services we procure. During 2018, our Suppliers were vetted through our Vendor Vetting process. Going forward, we will review our Vendor Vetting process for Suppliers in light of the Modern Slavery Act.

### Training

- In 2018 we did not provide specific Modern Slavery training to our staff.
- In 2019, we aim to raise awareness of modern slavery amongst staff through information and training sessions.
- We are committed to providing Modern Slavery training to all of our staff in 2019. We are also planning specialised training for staff involved in engaging Suppliers.
- Some of the charities obtaining funds through lotteries for which we are External Lottery Manager have expertise in matters such as working to protect children from exploitation and trafficking. We will look to work with such charities to inform our actions to address modern slavery, and help such charities create greater public awareness of modern slavery issues.

### Measurement

In 2019 we will aim to achieve the following:

- Rolling out relevant Modern Slavery training to all our people
- Where possible, engaging Supplier's on our standard terms and conditions or incorporating our Code of Conduct into Supplier contracts
- A review of our Vendor Vetting process
- Working with relevant charities who have expertise in tackling issues relating to modern slavery and who obtain funds through the lotteries for which we act as External Lottery Manager, in order to help inform our approach, and to support them in raising public awareness of the issues.

Approved by the Board on 10th July 2019  
For and on behalf of Postcode Lottery Limited

A handwritten signature in blue ink, appearing to read 'Sigrid van Aken'.

**Sigrid van Aken**

Director  
Postcode Lottery Limited

For further information, contact  
[communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)