

Title	Slavery and Human Trafficking Statement 2019
Author	PPT Legal Department
Purpose	Prevention of Slavery and Human Trafficking within the Workplace
Executive Summary	<p>As a business we have a responsibility to be alert to the risks of modern slavery and human trafficking, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.</p> <p>We expect all who have or wish to have a business relationship with Park Place Technologies (PPT) and/or any member of our Organisation, to familiarize themselves with our anti-slavery values and to always act in a way which is consistent with our anti-slavery values.</p>
Approval	Chris Adams, CEO

## Introduction

As a corporation we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We fully expect our employees and business associates to act in this way and to assist in the implementing and enforcement of effective systems and controls to ensure modern slavery is not taking place in our own businesses or those of our suppliers.

As part of our culture of good governance for good business, we operate to a set of core values that are reflected in our relationships with our customers, suppliers and team members. Our business values and relationships reflect our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can within our own business dealings. We expect and demand the same attitude of all those who work for us and expect it of all with whom we work with.

## Organization's Supply Chain

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Prohibition of Trafficking in Persons Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

To date we have not been made aware of any human trafficking or modern slavery activities within our supply chain but if any were to be highlighted to us then we would act immediately in accordance with our legal and moral obligations.

## Due Diligence Processes for Slavery and Human Trafficking

The organisation undertakes due diligence when considering new suppliers, and regularly reviews its existing suppliers. As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with suppliers and business associates and make clear our expectations of business behaviour with regards to Modern Slavery and Human Trafficking;
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch. We expect these entities to have suitable anti-slavery and human trafficking policies and processes in place, including appropriate risk assessments within their own supply chains.
- Systems have been put in place to encourage the reporting of concerns and to protect whistle blowers.

## Training and Awareness Program

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff, particularly in our procurement teams.

All Directors and Senior Managers have been briefed on the subject and the Company's Prohibition of Trafficking in Persons Policy has been made available to all employees on the company's intranet.

Additionally, sections within our Employee Handbook have been added to cover where to find these policies, and procedures for reporting any suspected incidents.

## Additional Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Hotline and Whistleblowing Policy - The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation has a hotline, available to all employees and posted in all offices and on the company internal intranet, designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can also contact our Legal or HR Department who will advise complainant of the relevant Company Director/investigating Officer in line with this policy.
- Employee Handbook & Code of Conduct - The organisation's Employee Handbook and Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation.

## Applicability

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's Slavery and Human Trafficking Statement for the current financial year. It is subject to annual review by the company's Board of Directors and may be amended from time to time.