

# The Rank Group Plc's Modern Slavery Statement for the financial year to 30 June 2025

This statement is made pursuant to <u>Section 54, Part 6 of the Modern Slavery Act 2015 and covers all companies within our Group</u>.

### **About us**

We are a UK FTSE 250 listed company that offers gaming-based entertainment in venues and online through multiple brands, including Mecca Bingo, Grosvenor Casinos, Enracha, YoBingo, YoCasino, YoSport, Regal Wins, Magical Vegas, Kitty Bingo, Spin and Win, Lucky Pants Bingo and Lucky VIP.

# **Our position**

We are fully supportive of the Modern Slavery Act 2015 and its intention to tackle modern slavery in all its forms, including slavery, servitude, forced labour and trafficking.

# **Our policy**

We have zero tolerance towards modern slavery.

We are committed to implementing and enforcing effective systems and controls to seek to ensure that modern slavery is not taking place anywhere in our business or supply chains.

### **Risk assessment**

We operate primarily in Europe with limited supply chains and little direct supply from higher risk locations. In the limited instances where we procure goods and services that are in higher risk categories (for example, uniforms or construction), we partner with suppliers which have established and mature supply chain practices.

In these circumstances, we believe that our exposure to the risks of modern slavery is low. We nevertheless recognise that there is still scope for modern slavery to occur and this statement sets out the steps we have taken to minimise this risk. Our risk assessment will be kept under review and, if circumstances change, we will institute additional actions accordingly. Please see below for more detail as to our assessment of the risks present in our supply chain.

### **Our colleagues**

We have 7,700+ colleagues employed globally in the UK, Spain, Malta, Mauritius, South Africa, Gibraltar and Ceuta.

We have a comprehensive suite of colleague responsibility policies which are relevant to our commitment to ensure that there is no modern slavery in any part of our workforce. Our relevant policies include:

- Recruitment Policy;
- Positive Work Environment Policy (previously Bullying and Harassment Policy);
- ED&I Policy;



- Grievance Procedure;
- Employment Eligibility Policy;
- Code of Conduct;
- Equal Opportunities Policy; and
- Speaking Up (Whistleblowing) Policy.

All policies and procedures are maintained and implemented primarily by our team of people and culture professionals, with the monitoring of compliance of these policies carried out by internal audit.

We respect the right of freedom of association and support colleague engagement, representation and dialogue through open business forums and team forums and colleague representative groups.

We also support the ability of a colleague to individually raise potential concerns or grievances, and we enable such concerns to be raised anonymously through an externally provided whistleblowing channel, provided by SafeCall.

We aim to attract a diverse workforce of people who are passionate about what they do, reflect our values, and strive to do the right thing by their peers and our customers. This is reflected in our recruitment policies. Our operating model does not depend hugely on temporary or migrant workers, and our workforce is mainly directly employed, giving us direct visibility of recruitment and onboarding processes for the majority of our colleagues. We recognise that discrimination is both unlawful and unethical, and that it can contribute to the risk of exploitation.

Accordingly, we recruit, promote and reward people on merit. Our Equality, Diversity and Inclusion Policy sets out our commitment not to discriminate based on a person's age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership. We pride ourselves on having legal and ethical recruitment practices in all countries we operate in.

As part of those practices, we ensure that an individual's legal right to work is checked; appropriate employment references are received; and suitable identity documentation can be produced by the candidate (i.e. they have access to their passport or equivalent in their name and it is not held by anyone other than the employee). For some roles (e.g. senior or specialist roles), identity confirmation checks are also carried out formally through our people and culture teams and third-party organisation Credence.

### Our supply chain

To operate our business, we engage with approximately 1,000 suppliers and service providers.

Our team of procurement professionals review our supply chain to evaluate modern slavery risks, in accordance with guidance issued by the Chartered Institute of Purchasing & Supply. Risk factors include the commodity purchased and the supplier's location.



We recognise that the **greater risk of modern slavery lies within our supply chains**, particularly in the following areas:

- **High-Risk Products/Services**: Uniforms, electronics, and promotional materials sourced from global suppliers.
- **High-Risk Countries**: Tier 2 and Tier 3 suppliers operating in regions with weaker labour laws (e.g. parts of Asia and Eastern Europe).
- High-Risk Sectors: Manufacturing, construction, logistics, and cleaning services.
- **Vulnerable Groups**: Migrant workers, agency labour, and low-skilled workers in outsourced services.
- Types of Risk: Forced labour, debt bondage and deceptive recruitment.

# Supply chain - Due diligence

A mandatory self-assessment questionnaire is completed when our suppliers are listed on our contract management portal, which requires them to detail their labour standards.

Our Procurement team reviews our at-risk suppliers on an ongoing basis, requiring them to demonstrate the processes that they have in place to mitigate against human rights and slavery issues within their own supply chain.

Any suppliers considered at risk are made aware of this statement and required to formally demonstrate compliance.

Additionally, we have a <u>Supplier Code of Conduct</u> aimed at ensuring those in our supply chain act ethically and in line with our values and requirements concerning modern slavery.

We seek to include robust anti-modern slavery provisions in contracts with all key suppliers.

# **Education and training**

This statement is issued to all relevant colleagues to ensure a high level of understanding of the risks of modern slavery in our business and supply chains.

# Effectiveness and performance review

We do not have key performance indicators at this time given our low risk assessment, but this is kept under review. This year, we have further strengthened our commitment to tackling modern slavery through our partnership with the Slave-Free Alliance. This collaboration is paving the way for targeted actions across our operations and supply chains, including enhanced risk assessments, training, and supplier engagement. As this partnership evolves, we look forward to sharing further updates and measurable progress in our next modern slavery statement.

We assess any instances of non-compliance with our policy on a case-by-case basis. In relation to our own employment practices, we monitor and review in several areas:

 All colleague data through our people and culture dashboard (including attrition, ethnicity, gender, diversity, equal and fair pay).



- We monitor engagement and sentiment through our colleague engagement scores twice yearly.
- We operate an external 'Speaking Up' service where colleagues can confidentially raise issues in line with our Whistleblowing Policy.
- Internal audit will assess our compliance of our policies and procedures through a regular joiner, mover, leaver audit and make any recommendations for improvements where necessary.
- Our payroll teams run monthly reports to ensure colleagues are paid appropriately in relation to UK minimum wage legislation and relevant pay legislation in the other countries in which we operate.

In relation to at-risk suppliers, we will only trade with those who comply with this policy statement or who are taking verifiable steps towards compliance with it.

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

John O'Reilly, Chief Executive

12 August 2025