

Anti-Modern Slavery and Human Trafficking Statement 2025

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Introduction

Allwyn Entertainment Ltd (AEL), as operator of The National Lottery, is committed to operating responsibly, upholding high standards of integrity, and taking active steps to prevent modern slavery and human trafficking across our operations, retail partners, and supply chain.

AEL is a subsidiary of Allwyn, an international lottery group, operating in Austria, the Czech Republic, Cyprus, Greece and the United Kingdom. Allwyn also operates the Illinois State Lottery in the United States, under a private management agreement and is a member of the Lotto Italia consortium in Italy.

This Anti-Modern Slavery and Human Trafficking Statement covers the period 1 January 2025 – 31 December 2025. Published in accordance with section 54 of the Modern Slavery Act 2015, this Statement outlines the measures taken by AEL, to identify and mitigate the risks of modern slavery and human trafficking within our operations, supply chain, and retail partners.

About Us

Our vision for The National Lottery is to change lives every day, both for the players who win life changing prizes and for the millions of communities who benefit from National Lottery funding. Since its launch in 1994, The National Lottery has raised more than £52 billion for over 670,000 community, arts, heritage, and sports projects across the UK. As its operator, AEL is responsible for maintaining this legacy while modernising The National Lottery to meet the expectations of today's players.

In 2025, we upheld our mission to grow The National Lottery responsibly. Our values of being Trusted, Inclusive, and Innovative guided our culture and the way we operated, helping ensure that integrity and responsible business practices remained central to how we worked, made decisions, and delivered our responsibilities throughout the year.

Our Social Value Framework guided our activities in 2025 through its four pillars:



*linked to our Participant Protection strategy

Responsible Play: protecting the interests of everyone who plays, engages, or interacts with The National Lottery.

Empowering People: making all parts of The National Lottery inclusive, accessible, and fair.

Protecting the Planet: building a net zero National Lottery.

Prosperous Places: helping communities and high streets thrive.

Our anti-modern slavery and human trafficking activities aligned with our 'Empowering People' pillar, reflecting our commitment to fairness, dignity, and the protection of individuals across our operations, supply chain, and retail partners.

**From 1 January 2025 –
31 December 2025 we:**

**Employed
1,562 people¹**

**Raised, on
average, £32 million
per week for Good
Causes**

**Onboarded 121
new suppliers, of
which 87%
were UK based**

Achievements

- We had no confirmed incidents of modern slavery or human trafficking within our business or supply chain.
- 100% of eligible suppliers completed our Social Value Questionnaire (SVQ), with no scores falling outside our established tolerance thresholds relating to modern slavery or human trafficking.

The SVQ, a key due diligence tool, was used to assess suppliers' policies, controls and processes relating to modern slavery and human trafficking. It strengthened our ability to identify, assess, and mitigate risks across our supply chain and provided comprehensive visibility, consistent assurance, and early identification of potential issues. Our process also supported suppliers to align with recognised good practice.

- Established a new collaboration with National Lottery funded Unseen UK.

Following recommendations from our 2024 anti-modern slavery and human trafficking gap analysis completed by Business in the Community, we began working with Unseen UK, a National Lottery funded organisation delivering frontline support to victims and survivors of modern slavery and human trafficking. This collaboration enhanced colleagues' understanding of the lived realities of modern slavery and human trafficking in the UK and strengthened our ability to identify and mitigate risks across our business, supply chain, and retail partners.



Our Colleagues

In 2025, we strengthened colleagues' understanding of modern slavery and human trafficking and their role in helping to prevent it. Relevant internal policies, which included but were not limited to: Anti-Modern Slavery and Human Trafficking Policy, Code of Conduct Policy, Whistleblowing Policy, Social Value Policy, and Anti-Bribery and Corruption Policy, were updated. Colleagues were required to read and acknowledge them, to support awareness and accountability.

To support our colleagues' learning and awareness, we delivered two mandatory online training modules: a core module for all colleagues and an enhanced module for those working with our supply chain and in retail facing functions. For example, colleagues working in procurement, retail-facing roles, or facilities management were made aware that risks may arise through labour-intensive services, outsourced cleaning or security provision, or unusual changes

¹ Total FTC, and Perm employed, including colleagues who joined or left the business during 2025.



to colleague pay, working patterns, or personal circumstances. Training and guidance emphasised these practical scenarios and reinforced the responsibility of all colleagues to identify and report concerns. We met our target of 100% completion for both training modules. Training effectiveness was assessed through end-of-module knowledge checks that all colleagues had to pass.

We refreshed our internal intranet content, providing colleagues with updated information, guidance and resources relating to modern slavery and human trafficking.

Through our new collaboration with Unseen UK, we delivered a bespoke “Brunch and Learn” session that gave colleagues the opportunity to hear directly from specialists supporting victims and survivors of modern slavery and human trafficking. This session helped colleagues understand how our ‘Empowering People’ pillar aligns with Unseen UK’s mission and the wider work taking place across the UK to prevent exploitation.

Building on progress made in previous years, we supported our network of approximately 30 Social Value Leads appointed across the business in 2024. These colleagues played a vital role in 2025, acting as first points of contact within their teams for social value matters, including providing advice and support related to modern slavery and human trafficking.

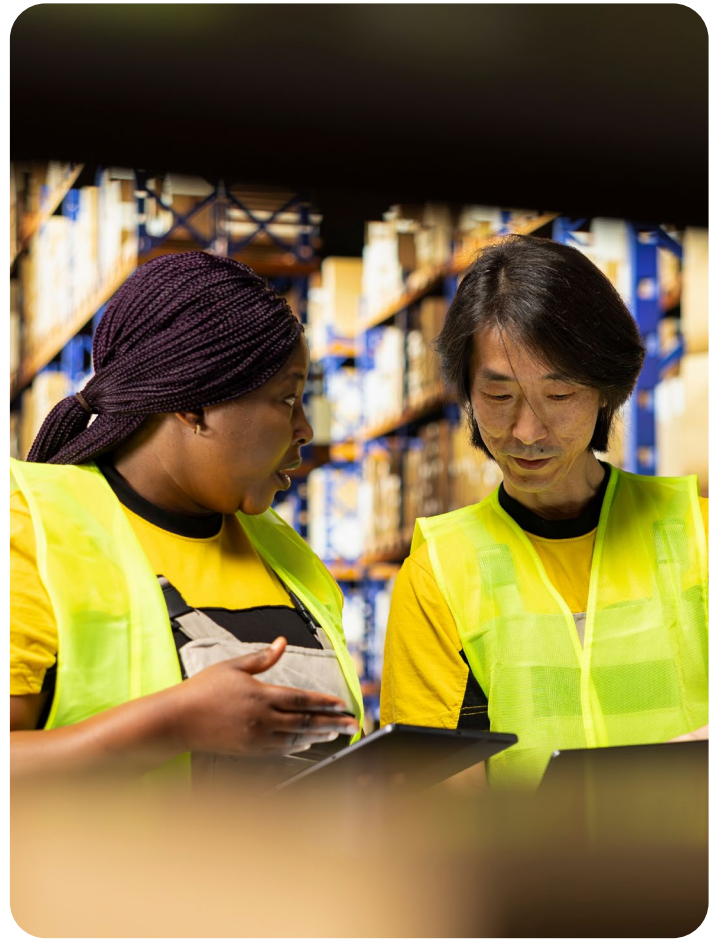
We began exploring additional safeguards within colleague onboarding and data management processes, for example introducing checks on bank details and home addresses. While this work remained exploratory during 2025, it represented a step towards further strengthening our ability to identify potential indicators of exploitation within our operations.

Our Suppliers

Our supply chain included suppliers across a range of categories, including technology and systems, professional services, marketing and media, print and distribution, facilities management, and security related services. While most of our direct suppliers are UK based, we recognise that elements of upstream supply chains may extend into higher risk geographies and sectors.

In 2025, we applied a structured, risk-based approach to supplier management, embedding clear expectations, ethical standards, and thorough due diligence throughout our supply chain.

As part of this approach, we used our SVQ to assess suppliers' responsible business practices, including the policies, controls, and processes in place to prevent modern slavery and human trafficking. The SVQ is proportionate to supplier size. Responses were assessed using a scoring methodology to inform supplier onboarding, ongoing engagement, and risk management activity. Where suppliers fell outside established tolerance thresholds, appropriate action was taken, which may have included agreeing time bound improvement plans or, where necessary, declining to onboard or continue a supplier relationship. In our context, potential risks may arise within parts of the supply chain that involve manufacturing, print, promotional goods, waste management, logistics, or the use of subcontracted labour, particularly where services are labour intensive or extend into upstream supply chains. These risk factors inform our due diligence approach and escalation to enhanced review where required.



All eligible suppliers with a total contract value of more than £10,000 were required to complete the SVQ as a condition of engagement. In addition, all newly contracted suppliers were required to review and comply with core organisational policies, including but not limited to: Anti-Bribery and Corruption Policy, Acceptable Use Policy, and Supplier Code of Conduct and were provided with our 2024 Anti-Modern Slavery and Human Trafficking Statement.

For suppliers with a total contract value below £10,000, proportionate due diligence was undertaken to gain assurance of alignment with our anti-modern slavery and human trafficking commitments and relevant legislation. Where higher risks were identified, additional evidence was requested, along with time-bound improvement actions, or enhanced monitoring. Where suppliers were unable or unwilling to address identified risks, we reserved the right to suspend or terminate contractual relationships.

Where possible, relevant provisions were incorporated into our contractual terms to help ensure compliance by suppliers with Anti-Modern Slavery and human trafficking laws.

Our Retail Partners

In 2025, we worked closely with our network of over 43,000 retail partners across the UK, including both independent and head-office led retailers. Although our retail partners do not form part of our direct supply chain, we recognise that retail environments present risks associated with labour exploitation. For this reason, we applied anti-modern slavery and human trafficking controls and awareness activity across our retail estate, reflecting our commitment to going beyond minimum legal requirements.



Expectations of our retailers, relating to ethical conduct, were set out in The National Lottery Retailer Agreement, which included requirements to comply with applicable laws and to have no convictions relating to modern slavery or human trafficking. Our retailers were also required to adhere to our wider Financial Crime Framework and associated standards.

To support awareness and understanding, we enhanced the information and tools available. Our National Lottery Retailer Hub was updated with new guidance and helpful resources. Our Retail Training Centre, an e-learning platform, provided training materials on identifying signs of modern slavery and human trafficking and appropriate safeguarding actions, including access to our 2024 Anti-Modern Slavery and Human Trafficking Statement.

We extended awareness activity through a two-page feature in our quarterly Jackpot magazine and distributed to all our retailers. The feature, produced in collaboration with Unseen UK, highlighted how National Lottery funding supports their work and provided practical guidance, including case studies, to help those working in retail environments recognise and respond to potential exploitation.

In retail environments, potential risks may include the use of informal or temporary labour, individuals working unusually long hours, restricted freedom of movement, or signs of coercion or control; our guidance and training supported our retailers to recognise these indicators and understand how to raise concerns safely.

Monitoring and oversight of our retailers remained a key priority during 2025. Our Security team actively monitored potential modern slavery and human trafficking risks. This activity was supported by ongoing engagement with relevant enforcement bodies, including Immigration and Enforcement teams, and by open-source monitoring of government and media reporting.

Our Retail Sales Team and Mystery Shopper Programme visited and engaged with our retailers, providing multiple contact points through in-store visits and outbound calls. These interactions supported awareness, compliance, and the early identification of potential risks. Clear reporting and escalation routes remained in place throughout the year, with proportionate action taken where necessary, which could include suspending or terminating retailer terminals and removing National Lottery products from stores.

Assessing and Managing Risks

We maintained our established approach to assessing and managing risks related to modern slavery and human trafficking throughout 2025. Our Risk Management Policy set out AEL's risk appetite and tolerance across nine defined categories, aligned with recognised risk management standards. As in previous years, our appetite and tolerance for any risk associated with modern slavery and human trafficking remained low.

Through our Risk Management process, relevant risks were identified, assessed, and recorded on the appropriate team's Functional Risk Register, with ownership assigned to the relevant Accountable Executive. Robust controls remained in place during 2025, ensuring these risks stayed within our defined appetite and tolerance levels.

Accountability and Governance

The AEL Board retained overall accountability for ensuring we met our obligations under the Modern Slavery Act 2015, with oversight delegated to the Compliance and Risk Management Committee (CRMC), which, reviewed relevant risks and controls throughout the year. The Board and the CRMC provided active oversight throughout 2025.

Responsibility for delivering our policies, training and awareness activities sat with the Chief Corporate Affairs Officer, who could escalate matters directly to the CRMC when required. The Social Value team provided specialist guidance to colleagues across the organisation, helping ensure our approach remained robust, informed and aligned with best practice.

Reporting

In 2025, we remained committed to ensuring that any concerns about modern slavery or human trafficking could be raised safely and responded to quickly. Colleagues were required to report any suspected cases within our business or supply chain to our People Team or their line manager.

One concern was raised by a colleague, via our People team reporting route, relating to a potential case of modern slavery and human trafficking within our business. Following a prompt internal review, no evidence of exploitation or wrongdoing was found, and the case was closed. This outcome demonstrated that our internal reporting and investigation processes operated effectively and as intended.

Our whistleblowing Policy provided a confidential and anonymous route for raising concerns, supporting our safeguarding approach, and reinforcing our zero-tolerance stance on unethical or harmful practices. Our internal investigation process defined the nominated contacts responsible for escalating matters to both the Audit Committee and the Compliance and Risk Management Committee (CRMC), in accordance with governance requirements.

If colleagues became aware of potential modern slavery or human trafficking outside our business or supply chain, guidance remained available through the Modern Slavery Helpline on 0800 0121 700. In situations involving immediate risk to safety, we advised contacting the local police without delay.

Next Steps

- Continue implementation of short-term actions (2025–2027) arising from our anti-modern slavery and human trafficking gap analysis, including further development of colleague onboarding safeguards such as bank detail and address checks.
- Keep relevant policies under review to ensure ongoing alignment with legislation and recognised good practice, supported by mandatory read and acknowledge requirements.
- Maintain annual anti-modern slavery and human trafficking training for colleagues, alongside a review of existing training modules with the intention of delivering refreshed content in 2026.
- Continue to deliver education, awareness and controls activity for retail partners and explore opportunities to enhance training and engagement through our collaboration with Unseen UK.
- Retain the Social Value Questionnaire as a core element of supplier onboarding and begin exploring options to streamline the process while maintaining robust and proportionate due diligence.
- Review and refresh principal and functional risks where required to ensure appropriate mitigations remain in place and effective.

This statement was approved by the AEL Board of Directors on 11 May 2026, in compliance with the Modern Slavery Act 2015.