

Statement by the Directors of Intouch Games Limited

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Intouch Games Limited slavery and human trafficking statement for the 2021/2022 financial year.

Introduction

Intouch Games Ltd (ITG) is a private limited company, founded in 2003 in the UK and now employing approximately 350 members of staff. It is headquartered in Halesowen with smaller offices in Bucharest (Romania) and Taipei City (Taiwan). ITG is an online gaming company operating a number of casino brands and developing online gaming content in-house.

Based on the risk assessment informed by the nature of our business, which is focused on online gambling and gaming products and kept under constant review, ITG operations and supply chain remain 'low risk' in terms of both actual instances of, and the potential for, slavery or trafficking.

The directors are responsible for ensuring Intouch Games Ltd meets its modern slavery obligations and responsibilities. They are supported by the Head of Compliance, Head of HR and Head of Commercial. As an organisation we are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains.

Our Governance Committee oversees our approach to addressing modern slavery through our governance and risk frameworks and will submit reports to the Board on our progress against our strategic goals on a quarterly basis.

Human rights and modern slavery are key elements of the annual corporate risk assessment process overseen by our General Counsel.

Structure and Supply Chains

As an organisation we are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. As a limited company in the UK eGaming sector we work with a range of suppliers in the UK and we recognise the role we have to play in promoting ethical business practices.

Our staff are directly employed and are not in any category which is generally seen to be vulnerable to modern slavery, so our focus is to ensure there are policies and procedures in place for our suppliers.

Policies on Modern Slavery

As part of our commitment to prevent modern slavery, we have implemented our Anti-Slavery Policy which influences all of our operational procedures within our organisation. In addition, we have mature policies including but not limited to anti money laundering, business ethics, anti-bribery, whistleblowing, and supplier security. Our policies are reflective of our promise to work ethically and with integrity within all our business relationships.

The above policies are reviewed annually or following a change to legal requirements. They are available to all employees and promoted through training and our company intranet.

Due Diligence Processes, Risk Assessment and Measuring Effectiveness

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chains through the implementation of audits.

Whilst we do not consider that we operate in high risk sectors or locations, we recognise that there is always the potential for slavery and human trafficking to occur. As such we continually monitor suppliers we believe may present a higher modern slavery risk in our supply chain and where necessary, take appropriate action.

In 2020 we enhanced our due diligence process to include additional questions for our suppliers around modern slavery so that we can better understand and evaluate levels of compliance with relevant anti-slavery legislation and associated regulations and codes. The results of these enhanced checks, along with any policies submitted for review as part of this process, will be reviewed and evaluated by our Governance Committee on a monthly basis and any necessary corrective action required or any enforcement action will be initiated through this forum.

We have not identified any instances or indicators of modern slavery over the past 12 months. Any such instances would not be tolerated and we intend to be transparent about any action taken within future statements.

Training for Staff

We have provided advice and guidance to those teams who have direct responsibility for relevant supply chains and in the next financial year we will provide online training to all our supplier-facing staff alongside our senior management team. It is our intention to provide induction and annual refresher training to these staff members on an ongoing basis.

Communication

This statement will be available on the InTouch Games Limited website and has been submitted to the Home Office modern slavery statement digital registry.

Commitments for this financial year

We have reviewed our key performance indicators relating specifically to the prevention of modern slavery, to encompass the commitments shown below:

- We will monitor the implementation of the new supplier due diligence questionnaire
- We will promote our Anti-Slavery Policy to all staff through our company intranet
- We will enhance our internal audit programme to ensure that compliance with modern slavery requirements is effectively reviewed.
- We will maintain a zero tolerance approach to modern slavery and take action where we identify practices which are not consistent with our policies by implementing an effective incident response plan.

Approval

This Transparency Statement has been formally approved by the Directors of Intouch Games Limited and signed on their behalf.



Simon Wilson
Managing Director
08/04/2020