



## INTRODUCTION

The Modern Slavery Act 2015 ('the MSA' or 'the Act') requires UK companies to promote ethical business practices and policies that protect workers from being abused and exploited in their own organisations and global supply chains. The Act specifically requires all businesses with annual revenues of over £36 million to publish a transparency statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains.

In October 2017, the Home Office published updated guidance 'Transparency in Supply Chains etc., A Practical Guide' ('the Guidance'), under Section 54(9) of the Act, which provides further clarification of how companies are expected to comply with the Act, and reaffirms the importance of an effective response from UK business to the threats and risks posed by modern slavery.

William Hill, which is the Group's qualifying entity for these purposes, published its first transparency statement to comply with the Act in February 2017. (Click here to read our [2017 statement](#)). This constitutes the Group's third transparency statement, and the second following publication of the guidance.

## ABOUT WILLIAM HILL

William Hill, The Home of Betting, is one of the world's leading gambling companies, employing more than 16,000 people in eight countries. Founded in 1934, it is the one of the UK's largest bookmakers with around 2,300 licensed betting offices that provide betting opportunities on a wide range of sporting and non-sporting events, and gaming on machines.

The Group's Online business ([www.williamhill.com](http://www.williamhill.com)) has been around since 1998. It is one of the world's leading online betting and gaming businesses, providing customers with the opportunity to access William Hill's products online, through their smartphone or tablet. William Hill US was established in 2012 and is the leading sports betting operator in the United States with a presence in the states of Nevada, Delaware, New Jersey, Mississippi, West Virginia, Pennsylvania, Rhode Island and Iowa. William Hill is looking to expand into additional US states and offer sports betting. In October 2018, the Group announced a recommended public cash offer for Mr Green & Co, a Stockholm-listed iGaming group with operations in 13 markets and brands including Mr Green and Redbet; the transaction completed in January 2019.

With its Online business headquartered in Gibraltar, the Group also maintains licensed websites in Italy and Spain. Additionally, the Group has support functions in Bulgaria, the Philippines and Poland.

For the 53 weeks ended 1 January 2019, group net revenue was £1.6bn, with group adjusted operating profit<sup>1</sup> of £233.6m and adjusted profit before tax of £200.2m.

William Hill is registered with appropriate authorities in the relevant countries in which it has operations, including with the GB Gambling Commission. William Hill continues to focus on encouraging responsible gambling, and shaping industry best practice. We work closely with customers, sports bodies and suppliers to help improve the business we operate in. Further information is available at [www.williamhill.com](http://www.williamhill.com).

William Hill PLC is listed on the London Stock Exchange and is a member of both the FTSE 250 and FTSE4Good Indices.

## POLICIES

As a Company, we are committed to conducting our operations with honesty and integrity, and with respect for human rights and the interests of our employees and shareholders. We similarly respect the legitimate interests of those with whom we do business, and who are affected by our operations.

Our Code of Business Conduct has been approved by the William Hill PLC Board and sets out the basic principles that we expect all to comply with across the Group. This is supplemented by more detailed policies and procedures in a number of areas, which are communicated to employees and other stakeholders as appropriate. Our policies operate within a framework to comply with all relevant laws.

<sup>1</sup> See Page 3 of the 2018 Annual Report and Accounts for the definition of adjusted operating profit.

## ASSESSMENT OF MODERN SLAVERY RISK

The Board of William Hill remains cognisant of the continuing risks, impacts and costs of global slavery and human trafficking, and fully supports both the original principles of the MSA and the Guidance published in October 2017. William Hill actively maintains a zero tolerance approach to slavery and trafficking in all its forms, in any part of its business or supply chain, continuing to apply the UN Guiding Principles on Business and Human Rights and core labour standards set out by the International Labour Organisation.

The Corporate Responsibility Committee of the Board oversees our approach to addressing modern slavery and through our well-established governance and risk frameworks, the Board is kept informed of material developments in this area. The Board has approved this Transparency Statement.

In 2018, we continued to review and assess the risk of modern slavery in our business and supply chain, taking into account the Guidance, and based on this, reaffirm that William Hill, its operations and supply chain remain materially **'low risk'** in terms of both actual instances of, and the potential for, slavery or trafficking. This assessment is based on: the nature of the Group's businesses, which are focused on retail and online gambling and gaming products and markets; there having been no significant changes to the nature of the Group's businesses or operations during the year; the robustness of the Group's people and supply chain policies; and that the majority of the Group's operations are based in, and revenues derived from, countries deemed low risk by conventional sustainability indices, including The Global Slavery Index (<http://www.globalslaveryindex.org/index/>). We also believe that the Group's business model is unlikely to create material risks of slavery and trafficking where none existed previously. This is because relatively few raw or manufactured materials are employed in the business, and a significant majority of those working within the business are employed directly by the Group, in line with the Group's employment policies and practices.

We do however recognise that some of the Group's operations and supply chains extend into countries deemed to present a somewhat higher modern slavery risk level, according to the Global Slavery Index. Relevant Group functions continue to consider appropriate ways in which risk levels arising in, for example, Philippines, Ukraine and Bulgaria, can be assessed and mitigated. No matters of concern have been identified to date.

## DUE DILIGENCE AND RISK MANAGEMENT

The Group has continued to pursue the introduction of modern slavery preventative clauses within its standard format supplier agreements, which the Group seeks to utilise for the majority of its material contracts. A new supplier management framework is also being developed to enhance assessment of supplier materiality for risk purposes. The Group has also extended its whistleblowing arrangements to the management and staff of its largest suppliers. These arrangements continue to be monitored by our Audit and Risk Management Committee.

The Group routinely conducts reputational checks, which specifically cover reports of modern slavery, when contracting with new suppliers. Furthermore, prospective suppliers responding to formal tender requests by the Group must confirm their ongoing compliance with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes applicable from time to time.

## FUTURE COMMITMENTS

1. To maintain the Group's zero tolerance approach to modern slavery and human trafficking;
2. To publish progress made against future MSA related objectives annually by reference to key performance indicators;
3. To continue to assess exposure to slavery and trafficking risks across the Group's supply chain, conducting such supplier due diligence, risk assessments and audit as are proportionate to any risk presented by each part of the business and each supply chain;
4. To enforce, and further strengthen, the Group's mitigation procedures and policies for modern slavery related risks;
5. To build awareness of modern slavery risk and mitigation measures into the staff training already offered by the Group; and
6. To continue to take appropriate action wherever behaviours or activities not consistent with Group policies are discovered.

## TRANSPARENCY STATEMENT

This Transparency Statement is made by William Hill in accordance with Section 54(6) of the MSA, for the financial year ending 1 January 2019. The statement has been formally approved by the Board of Directors of William Hill PLC and is also endorsed by Philip Bowcock, Chief Executive Officer and Ruth Prior, Chief Financial Officer.

**Philip Bowcock**  
Chief Executive Officer

**Ruth Prior**  
Chief Financial Officer

1 March 2019

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