

Chisholm Bookmakers Slavery Act 2015 statement for year ending 2024

Introduction

This statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015. It sets out Chisholm Bookmakers Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to activities during the financial year 2024.

As part of the betting industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company Structure

This statement covers the activities of Chisholm Bookmakers Ltd.

Chisholm Bookmakers Ltd is a family owned betting and gaming company, founded in the late 1950s. The business operates 34 licensed betting shops in the North East of England, Cumbria with an annual turnover of £30m per year.

Within our shops we offer a full range of betting products. The Company have an online presence in digital sports betting.

We employ 179 people. Due to the regulated nature of our business, all our employees must be over 18 years of age. Our business is focused on well trained staff who provide a high quality service to customers. The Company continues to focus on encouraging responsible gambling and complying with industry best practice.

Company response

Our supply chain includes the purchase of data rights, premises and other related licences, IT software and hardware, telecoms, utilities, marketing, stationary and facilities management.

Compared to other high street retail outlets our supply chain is relatively small. We consider Chisholm Bookmakers are low risk of instances of or, the potential for slavery and human trafficking in its business or supply chain.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Company Policies

Chisholm Bookmakers 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.

- **Employee concerns (Whistleblowing) policy:** The Company encourages all of its employees, customers and other business partners to report any concerns related to direct activities, or the supply chains, of the Company. This includes any circumstances that may give rise to an

enhanced risk of slavery or human trafficking. The Company policy is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report any activities confidentially to their District Manager, Retail Operations Support Manager or Human Resources Manager.

- Employee code of conduct. The Company code makes it clear to employees the actions and behaviours expected of them when representing the organisation. Chisholm Bookmakers strives to maintain the highest standards of conduct and ethical behaviour through its operations and managing its supply chain.
- Recruitment Policy. Prior to commencement of employment all employees are subject to right to work employment checks in accordance with the Immigration Asylum and Nationality Act 2006. The recruitment policy is compliant to all EU and UK legislation, including the minimum wage and therefore not at risk of slavery and human trafficking.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Chisholm Bookmakers due diligence and reviews include;

- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Build long standard relationships with suppliers and make clear our expectations of business behaviour.
- If required take steps to improve substandard suppliers practices, including providing advice to suppliers and require them to implement action plans where applicable.
- If required, invoke sanctions against suppliers that fail to improve their performance in line with an action plan, which may include the termination of the business relationship.

Performance Indicators

In light of the introduction of the Modern Slavery Act 2015 the Company will;

- Review its existing supply chains by the end of the financial year to ensure their compliance to the Modern Slavery Act 2015.

Training

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. All Directors and Senior Managers have been briefed on the subject.

Board Member Approval

This statement has been approved by the organisations board of directors, who will review and update it annually.

Managing Directors Signature

(SIGNED BY THE MANAGING DIRECTOR)

Date: 11th April 2025