

Postcode Lottery Limited

# MODERN SLAVERY STATEMENT



## INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the anti-slavery and human trafficking statement of Postcode Lottery Limited for the calendar year ending 31 December 2024.

### Business Structure and Organisation

Postcode Lottery Limited is an External Lottery Manager, operating and promoting multiple society lotteries on behalf of a range of charities. It is a private limited company incorporated in the UK, and trades under the names People's Postcode Lottery and Postcode Lottery.

Postcode Lottery Limited is part of the Postcode Lottery Group. It is a 100% subsidiary of Novamedia B.V., which is ultimately wholly owned by The Novamedia Foundation Trust (Stichting de Novamedia Fundatie). The mission of the Postcode Lottery Group is to set up and operate charity lotteries all over the world to raise funds for charities and increase awareness of their work.

The group has been structured in order to protect this social mission, by ensuring returns are invested to achieve further social benefits, and by introducing safeguards to prevent shares from being capable of being sold to private investors for personal gain. Further detail about the safeguards in place to protect the social mission can be found at – [Organisation & governance - Postcode Lottery Group](#).

Given our social mission, we are fully supportive of measures to tackle modern slavery. Some of the charities and good causes obtaining funds through lotteries for which we are External Lottery Manager work to tackle modern slavery through matters such as protecting children from exploitation and trafficking, as well as tackling violence against women and girls.

Under Postcode Lottery Group's International Development and Human Rights strategy, Postcode Lottery Limited is committed to ending abuse, exploitation, trafficking and all forms of violence and

torture against vulnerable groups including women and children. In 2025, this will continue to be a focus area, working with organisations that aim to create greater public awareness and understanding of various issues regarding modern slavery.

For further information, contact  
[communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)

## **POLICIES**

### **Modern Slavery Policy**

We have a Modern Slavery Hub on our intranet which provides a one-stop shop for all of our resources relating to Modern Slavery including our Modern Slavery Policy. This policy includes the relevant references to our policies and procedures relating to Modern Slavery such as our Whistle Blowing Policy and our recruitment procedures. The Modern Slavery Policy also provides key information on how to identify Modern Slavery, and who to report any suspicious activity to within the business. The Modern Slavery Hub is available to all staff.

### **Supplier Code of Conduct**

Our standard terms and conditions incorporate our Supplier Code of Conduct. Our Supplier Code of Conduct prohibits our suppliers from using any form of forced labour. In addition, our standard contract obliges suppliers to comply with the Modern Slavery Act 2015.

Our policy is, where possible, to engage our suppliers on our standard terms and conditions or to incorporate our Supplier Code of Conduct into the supplier's terms and conditions. The updated Vendor Vetting process has made it easier to work with suppliers at the negotiation stage to incorporate the Supplier Code of Conduct and to track the number of suppliers who have adopted the Supplier Code of Conduct. We have also improved our process for engaging on our terms and conditions, incorporating our Code of Conduct, which are more suitable for small suppliers. In 2024 sixty per cent of our new suppliers have agreed to our standard terms and conditions, incorporated our Supplier Code of Conduct into their terms or have their own Code of Conduct in place. During 2024 we have continued to improve our procurement process for new suppliers and built on our baseline requirements. In 2025 we will be looking to increase the percentage of suppliers engaged on our standard terms and conditions or who have incorporated our Supplier Code of Conduct into their terms. We use a third-party supplier, RightsDD Act, to help assess our suppliers for slavery risk. All of our current suppliers have been assessed by RightsDD Act and we will continue to screen suppliers in 2025.

### **Whistleblowing Policy**

Our Modern Slavery Policy sets out who any concerns regarding possible Modern Slavery should be reported to. Our Whistleblowing Policy also sets out a confidential channel for our people to raise serious issues of public interest, including concerns about Modern Slavery. The Whistleblowing Policy is part of a suite of policies, which all our people are required to read and accept when they join Postcode Lottery Limited. The Whistleblowing Policy is also flagged in our Dignity at Work training which has been rolled out to all of our people.

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[communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)

## TRAINING

- In 2024 we worked with RightsDD Act who developed training tailored for our people involved in engaging new suppliers.
- The training was delivered through an interactive online training module. All of our people who were assigned to this course, completed this training.
- In 2024 we maintained and updated our Modern Slavery Hub which is available on our company intranet.
- In 2025 we will continue to develop the resources available on our Modern Slavery Hub and inform our people about Modern Slavery through articles on our internal intranet.
- Some of the charities obtaining funds through lotteries for which we are External Lottery Manager have expertise in matters such as working to protect children from exploitation and trafficking. During 2025 we will continue to work with such charities to inform our actions to address modern slavery, and help such charities create greater public awareness of modern slavery issues.

## Due Diligence and Risk assessment

While the risks of modern slavery are likely to be low for Postcode Lottery Limited, we nevertheless recognise the potential for risk through the goods and services we procure. During 2024, our suppliers were vetted through our Vendor Vetting process. Going forward, we will continue to vet all new suppliers and will review our contract management process for suppliers in light of the Modern Slavery Act. We will also utilise the risk assessments available through the RightsDD Act system.

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[communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)

## MEASUREMENT

### In 2024 we have achieved the following:

- All our people involved in engaging new suppliers completed Modern Slavery Training
- 60 % of new suppliers were engaged on our standard terms and conditions (which incorporates our Supplier Code of Conduct), have incorporated our Supplier Code of Conduct into their supplier contracts or have their own Code of Conduct in place.
- We worked with the RightsDD Act who have expertise in reporting and monitoring issues relating to modern slavery to help inform our approach, and in particular to develop and deliver our training for 2024.
- We updated the information on our Modern Slavery Hub.
- There was increased funding for charities who have relevant expertise in tackling modern slavery though the lotteries for which we act as External Lottery Manager.

### In 2025 we will aim to achieve the following:

- To provide all our people to with information about Modern Slavery and how to report suspected cases through our Modern Slavery Hub, and to keep this up to date and relevant.
- To inform our people about Modern Slavery issues through articles on our internal intranet.
- To provide Modern Slavery Training to our people involved in engaging new suppliers.
- To increase number of our suppliers who are engaged on our standard terms and conditions or who have incorporated our Code of Conduct into their agreement with us.
- To improve our contract management process and in particular to increase understanding of the supply chain.
- To audit some of our key suppliers on their compliance with our Code of Conduct.
- To continue the use of a third-party supplier, RightsDD Act, to help us manage the modern slavery risks of working with third party suppliers.
- To continue working with relevant charities who have expertise in tackling issues relating to modern slavery and who obtain funds through the lotteries for which we act as External Lottery Manager, in order to help inform our approach, and to support them in raising public awareness of the issues.

Approved by the Board on 18 February 2025  
For and on behalf of Postcode Lottery Limited

A handwritten signature in black ink, appearing to read 'Sigrid van Aken', written over a horizontal line.

**Sigrid van Aken**

Director  
Postcode Lottery Limited

For further information, contact  
[communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)



Postcode Lottery Limited

# MODERN SLAVERY STATEMENT



## INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the anti-slavery and human trafficking statement of Postcode Lottery Limited for the calendar year ending 31<sup>st</sup> December 2023.

### Business Structure and organisation

Postcode Lottery Limited is an External Lottery Manager, operating and promoting multiple society lotteries on behalf of a range of charities. It is a private limited company incorporated in the UK, and trades under the names People's Postcode Lottery and Postcode Lottery.

Postcode Lottery Limited is part of the Novamedia Group. It is a 100% subsidiary of Novamedia B.V., which is ultimately wholly owned by The Novamedia Foundation Trust (Stichting de Novamedia Fundatie).

The mission of Novamedia is ***“...to set up and operate charity lotteries all over the world to raise funds for charities and increase awareness of their work.”***

The group has been structured in order to protect this social mission, by ensuring returns are invested to achieve further social benefits, and by introducing safeguards to prevent shares from being capable of being sold to private investors for personal gain. Further detail about the safeguards in place to protect the social mission can be found at [Organisation & governance - Novamedia](#)

Given our social mission, we are fully supportive of measures to tackle modern slavery. Some of the charities and good causes obtaining funds through lotteries for which we are External Lottery Manager work to tackle modern slavery through matters such as protecting children from exploitation and trafficking, as well as tackling violence against women and girls.

Under Novamedia's International Development and Human Rights strategy, Postcode Lottery Limited is committed to ending abuse, exploitation, trafficking and all forms of violence and torture against vulnerable groups including women and children. In 2024, this will continue to be a focus area, working with organisations that aim to create greater public awareness and understanding of various issues regarding modern slavery.

## POLICIES

### Modern Slavery Policy

We have a Modern Slavery Hub on our intranet which provides a one-stop shop for all of our resources relating to Modern Slavery including our Modern Slavery Policy. This policy includes the relevant references to our policies and procedures relating to Modern Slavery such as our updated Whistle Blowing Policy and our recruitment procedures. The Modern Slavery Policy also provides key information on how to identify Modern Slavery, and who to report any suspicious activity to within the business. The Modern Slavery Hub is available to all staff.

### Supplier Code of Conduct

Our standard terms and conditions incorporate our Supplier Code of Conduct. Our Supplier Code of Conduct prohibits our suppliers from using any form of forced labour. In addition, our standard contract obliges suppliers to comply with the Modern Slavery Act 2015. Our policy is, where possible, to engage our suppliers on our standard terms and conditions or to incorporate our Supplier Code of Conduct into the supplier's terms and conditions. The updated Vendor Vetting process has made it easier to work with suppliers at the negotiation stage to incorporate the Supplier Code of Conduct and to track the number of suppliers who have adopted the Supplier Code of Conduct. We have also improved our process for engaging on our terms and conditions, incorporating our Code of Conduct, which are more suitable for small suppliers. In 2023 ninety-two per cent of our new suppliers have agreed to our standard terms and conditions, incorporated our Supplier Code of Conduct into their terms or have their own Code of Conduct in place. During 2023 we have continued to improve our procurement process for new suppliers and built on our baseline requirements. In 2024 we will be looking to maintain the high percentage of suppliers engaged on our standard terms and conditions or who have incorporated our Supplier Code of Conduct into their terms. We use a third-party supplier, RightsDD Act, to help assess our suppliers for slavery risk. All of our current suppliers have been assessed by RightsDD Act and we will continue to screen suppliers in 2024.

### Whistleblowing Policy

Our Modern Slavery Policy sets out who any concerns regarding possible Modern Slavery should be reported to. Our Whistleblowing Policy also sets out a confidential channel for our people to raise serious issues of public interest, including concerns about Modern Slavery. The Whistleblowing Policy is part of a suite of policies, which all our people are required to read and accept when they join Postcode Lottery Limited. The Whistleblowing Policy is also flagged in our Dignity at Work training which has been rolled out to all of our people.

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## TRAINING

- In 2023 we worked with RightsDD Act who developed training tailored for our people involved in engaging new suppliers.
- The training was delivered through an interactive online training module. All of our people who were assigned to this course, completed this training.
- In 2023 we maintained our Modern Slavery Hub which is available on our company intranet.
- In 2024 we will be developing the resources available on our Modern Slavery Hub and informing our people about Modern Slavery through articles on our internal intranet.
- Some of the charities obtaining funds through lotteries for which we are External Lottery Manager have expertise in matters such as working to protect children from exploitation and trafficking. During 2024 we will continue to work with such charities to inform our actions to address modern slavery, and help such charities create greater public awareness of modern slavery issues.

## Due Diligence and Risk assessment

While the risks of modern slavery are likely to be low for Postcode Lottery Limited, we nevertheless recognise the potential for risk through the goods and services we procure. During 2023, our suppliers were vetted through our Vendor Vetting process. Going forward, we will continue to vet all new suppliers and will review our contract management process for suppliers in light of the Modern Slavery Act. We will also utilise the risk assessments available through the RightsDD Act system.

## MEASUREMENT

### In 2023 we have achieved the following:

- All our people involved in engaging new suppliers completed Modern Slavery Training
- 92 % of new suppliers were engaged on our standard terms and conditions (which incorporates our Supplier Code of Conduct), have incorporated our Supplier Code of Conduct into their supplier contracts or have their own Code of Conduct in place.
- We worked with the RightsDD Act who have expertise in reporting and monitoring issues relating to modern slavery to help inform our approach, and in particular to develop and deliver our training for 2023.
- We updated our Whistleblowing policy.
- There was increased funding for charities who have relevant expertise in tackling modern slavery through the lotteries for which we act as External Lottery Manager.

### In 2024 we will aim to achieve the following:

- To provide all our people with information about Modern Slavery and how to report suspected cases through our Modern Slavery Hub, and to keep this up to date and relevant.
- To inform our people about Modern Slavery issues through articles on our internal intranet.
- To provide Modern Slavery Training to our people involved in engaging new suppliers.
- To maintain the high number of our suppliers who are engaged on our standard terms and conditions or who have incorporated our Code of Conduct into their agreement with us.
- To improve our contract management process and in particular to increase understanding of the supply chain.
- To audit some of our key suppliers on their compliance with our Code of Conduct.
- To continue the use of a third-party supplier, RightsDD Act, to help us manage the modern slavery risks of working with third party suppliers.
- To continue working with relevant charities who have expertise in tackling issues relating to modern slavery and who obtain funds through the lotteries for which we act as External Lottery Manager, in order to help inform our approach, and to support them in raising public awareness of the issues.

Approved by the Board on 24 January 2024  
For and on behalf of Postcode Lottery Limited

A blue ink signature of Sigrid van Aken, written in a cursive style.

**Sigrid van Aken**

Director  
Postcode Lottery Limited

For further information, contact  
[communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)



Postcode Lottery Limited

# MODERN SLAVERY STATEMENT



2024 / 2023 / **2022**

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## POLICIES

### Modern Slavery Policy

In 2022 we introduced a Modern Slavery Hub on our intranet which provides a one-stop shop for all of our resources relating to Modern Slavery including our Modern Slavery Policy. This policy includes the relevant references to our policies and procedures relating to Modern Slavery such as our Whistle Blowing Policy and our recruitment procedures. The Modern Slavery Policy also provides key information on how to identify Modern Slavery, and who to report any suspicious activity to within the business. The Modern Slavery Hub is available to all staff.

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### Whistleblowing Policy

Our Modern Slavery Policy sets out who any concerns regarding possible Modern Slavery should be reported to. In addition, in 2022 and continuing through 2023, our Whistleblowing Policy also sets out a confidential channel for our people to raise serious issues of public interest, including concerns about Modern Slavery. The Whistleblowing Policy is part of a suite of policies, which all our people are required to read and accept when they join Postcode Lottery Limited. The Whistleblowing Policy is also flagged in our Dignity at Work training which has been rolled out to all of our people.

For further information, contact  
[communications@postcodelottery.co.uk](mailto:communications@postcodelottery.co.uk)

## TRAINING

- In 2022 we worked with RightsDD Act who developed training tailored for our people. The training was delivered through an interactive online training module. All of our people completed this training.
- In 2022 we launched our Modern Slavery Hub which is available on our company intranet.
- In 2023 we will be developing the resources available on our Modern Slavery Hub.
- Some of the charities obtaining funds through lotteries for which we are External Lottery Manager have expertise in matters such as working to protect children from exploitation and trafficking. During 2023 we will continue to work with such charities to inform our actions to address modern slavery, and help such charities create greater public awareness of modern slavery issues.

## Due Diligence and Risk assessment

While the risks of modern slavery are likely to be low for Postcode Lottery Limited, we nevertheless recognise the potential for risk through the goods and services we procure. During 2022, our suppliers were vetted through our Vendor Vetting process. Going forward, we will continue to vet all new suppliers and will review our contract management process for suppliers in light of the Modern Slavery Act. We will also utilise the risk assessments available through the RightsDD Act system.

## MEASUREMENT

### In 2022 we have achieved the following:

- All our people completed Modern Slavery Training
- 82 % of new suppliers were engaged on our standard terms and conditions (which incorporates our Supplier Code of Conduct), have incorporated our Supplier Code of Conduct into their supplier contracts or have their own Code of Conduct in place.
- We worked with the RightsDD Act who have expertise in reporting and monitoring issues relating to modern slavery to help inform our approach, and in particular to develop and deliver our training for 2022.
- There was increased funding for charities who have relevant expertise in tackling modern slavery through the lotteries for which we act as External Lottery Manager.

### In 2023 we will aim to achieve the following:

- To provide all our people with information about Modern Slavery and how to report suspected cases through our Modern Slavery Hub and to use our intranet to highlight relevant issues to our people.
- To keep the Modern Slavery Hub on our company intranet up to date and relevant.
- Provide enhanced Modern Slavery Training to our people involved in engaging new suppliers.
- To maintain the number of our suppliers who are engaged on our standard terms and conditions or who have incorporated our Code of Conduct into their agreement with us.
- To improve our contract management process and in particular to increase understanding of the supply chain.
- To audit some of our key suppliers on their compliance with our Code of Conduct.
- To continue the use of a third-party supplier, RightsDD Act, to help us manage the modern slavery risks of working with third party suppliers.
- To continue working with relevant charities who have expertise in tackling issues relating to modern slavery and who obtain funds through the lotteries for which we act as External Lottery Manager, in order to help inform our approach, and to support them in raising public awareness of the issues.

Approved by the Board on 24 January 2023  
For and on behalf of Postcode Lottery Limited



**Sigrid van Aken**  
Director  
Postcode Lottery Limited

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