



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.

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. This constitutes the Group's fourth transparency statement, under the Act. Our previous statements can be found via the following link <https://www.williamhillplc.com/sustainability/operating-with-integrity/>.

ABOUT WILLIAM HILL

William Hill PLC is one of the world's leading sports betting and gaming companies, employing c12,000 people. Its origins are in the UK where it was founded in 1934, and where it is listed on the London Stock Exchange. The majority of its £1.6bn annual revenues are still derived from the UK, where it has a national presence of licensed betting offices and one of the leading online betting and gaming services. William Hill's European Online business is headquartered in Gibraltar and Malta, and is licensed online in 10 countries following the acquisition of Mr Green & Co AB in January 2019. In 2012, it established William Hill US with a focus on retail and mobile operations in Nevada and became the largest sports betting business in the US. Following the ruling in May 2018 by the Supreme Court that the federal ban on state sponsored sports betting was unconstitutional, William Hill US has expanded and continues to expand as new states regulate sports betting. It is now operating in nine states: Delaware, Indiana, Iowa, Mississippi, Nevada, New Mexico, New Jersey, Rhode Island and West Virginia in addition to Washington DC. Eldorado Resorts, Inc. currently owns shares representing 20% of the share capital of William Hill US Holdco, Inc., the holding company of William Hill US.

In 2019, group net revenue was £1.6bn, with group adjusted operating profit of £147.0m and adjusted profit before tax of £96.5m.

William Hill is registered with appropriate authorities in the relevant countries in which it has operations, including with the UK Gambling Commission. William Hill continues to focus on encouraging safer 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.

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.

ASSESSMENT OF RISK

The Board of William Hill remains cognisant of the continuing and emerging 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 risk 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 2019, 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.globallslaveryindex.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 has been 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.

TRAINING

Training on Modern Slavery and Human Trafficking forms part of the mandatory training modules required to be undertaken by all employees of the Company. This training is delivered through our e-learning platform and helps ensure the business remains compliant with the Act, as well as mitigate against the risk of modern slavery and human trafficking existing in our business and supply chain.

During the year, the e-learning training module was reviewed and updated to reflect case study examples, as well as procedures related to recognising and reporting suspected cases. In addition, all of our staff are encouraged to discuss any concerns they may have in relation to Modern Slavery either with their line manager or through the independent Whistleblowing hotline.

2019 ACTIONS

Specific actions taken in 2019 to further strengthen our approach to managing Modern Slavery risk, based on internally agreed KPIs included the following:

- Full desk based audit conducted on the Company's supply base to determine a risk rating approach to our suppliers;
- Formal confirmation statements requested from perceived higher risk suppliers to confirm compliance with all Modern Slavery obligations;
- Due diligence carried out on a sample of critical business related suppliers by Internal Audit team on Modern Slavery governance;
- Implemented contractual terms and conditions of business issuing preventative Modern Slavery clauses;
- Implemented Modern Slavery obligations in all formal tendering as minimum qualification criteria;

FUTURE COMMITMENTS

1. To maintain the Group's zero tolerance approach to modern slavery and human trafficking;
2. 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;
3. To implement alert-driven monitoring of the supply base via 3rd party software to identify any changes in the practises of existing or new suppliers.
4. To assess in 2020 further capability of assessing supply base modern slavery risk through using 3rd party software;
5. To continue to take appropriate action wherever behaviours or activities not consistent with Group policies or values 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 31 December 2019. The statement has been formally approved by the Board of Directors of William Hill PLC and is also endorsed by Ulrik Bengtsson, Chief Executive Officer and Ruth Prior, Chief Financial Officer.

Ulrik Bengtsson
Chief Executive Officer

Ruth Prior
Chief Financial Officer