

## **MODERN SLAVERY STATEMENT**

### **Luxury Leisure and RAL Ltd for 2023**

Modern slavery is a crime and an abuse of human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. Luxury Leisure and RAL Ltd. are sister companies with an operationally integrated business and this statement applies to each and both. Luxury Leisure and RAL Ltd. (together referred to as “we”, “us” or “our”) have a zero tolerance to modern slavery of any kind and are committed to acting ethically in all our business relationships. We aim to comply with the Modern Slavery Act 2015 and expect our suppliers and their supply chains to do the same. Our financial year runs in parallel with the calendar year. This statement covers the year 2023.

**We can report no known instances or indicators of modern slavery in our business or supply chain in the year 2023.**

#### **1. Structure and supply chains**

We are a leading operator of adult gaming centres in the UK and also operate a number of family entertainment centres. We do not operate in other jurisdictions. We operate within a highly regulated environment and are approved by the UK Gambling Commission which, together with local authorities throughout the country, have issued us with licences to operate. We also operate a smaller tanning business with a number of tanning salons in the regulated UK market.

We are part of the Novomatic UK group of companies and do not have intricate supply chains. Our main suppliers are of gaming machines and gambling related products. They include group companies and unrelated UK-based manufacturers, all of which are licensed by the Gambling Commission.

The vast majority of our main supplies are from UK based businesses who are well established and known to us. Any overseas manufacturers of main products are either group companies or similarly well established and known to us. Suppliers of equipment to our tanning business are well established UK companies; with manufacturers based in the UK, or in the case of one range of products, by a single associated company in Germany. Our supplier of tanning lotions is based in the UK and the manufacturer is in Florida.

Our other suppliers are providers of goods, services or works to support day-to-day management of our venues and operations.

As part of the Novomatic global group of businesses we adhere to the Novomatic global Code of Conduct. We support the UN Charter of Human Rights and the Work and Social Standards set out by the ILO and the addressing of misconduct in any area of human rights within our business relationships.

#### **2. Policies**

The main company and group policies that are relevant to monitor and reduce the risk of modern slavery occurring within our business or supply chain: -

- A modern slavery statement;
- Modern Slavery policy;
- Bribery and anti-corruption policy;
- Employee screening policy;
- Whistle-blowing policy;

- Equality and diversity policy; and
- Novomatic Global Group Code of Conduct.

### **3. Due Diligence processes**

All of our suppliers are screened at the commencement of our relationship with them using a screening tool that searches for adverse media, sanctions lists and politically exposed persons (PEPs). Thereafter they are screened annually\*. They are also subject to an open-source search and checked against Companies house.

\*High value suppliers are subject to additional due diligence checks every 6 months.

We adopt robust recruitment processes. All our employees have the necessary documentation to legally work in the UK, are paid at least the minimum living wage, and have reached school leaving age.

All employees are required to provide proof of their own bank account for the purposes of pay and any variations to this can only be authorised by the Risk and Compliance Director.

All employees above the level of venue supervisor (including relief supervisor) are required to submit a satisfactory Disclosure and Barring Service (DBS) report.

### **4. Risk Assessment**

We operate solely in the regulated UK market and with limited supply chains. However, we are alert to the possibility that such practices can exist anywhere. To this end the company is developing a response plan in the event of a modern slavery case being identified.

We have conducted a Modern Slavery Risk Assessment which identifies the risk of modern slavery within the organisation as low. The risk assessment is reviewed as a minimum annually or should there be an event which necessitates earlier review.

### **5. Measuring effectiveness**

All of our compliance responsibilities are subject to our 'compliance review framework'. This is centred around quarterly meetings at which the company CEO and COO are presented with all compliance activity and metrics. They review all data and the relevant department heads and other stakeholders are required to account for performance.

Underpinning these meetings are weekly and monthly monitoring and reports.

It is through this review framework that we have identified measures for progress as outlined in this Statement.

### **6. Education and Training**

We will communicate this statement to all relevant employees to ensure a high level of understanding of the risks of modern slavery in our business and supply chain.

We raise awareness amongst our staff of the risks of modern slavery in our business and supply chains and will continue to develop our approach. Training on the identification of Modern Slavery in our business and how to respond was carried out in October 2023 for all operations staff of Area Manager or higher and Heads of Departments.

Any suppliers considered at risk will be made aware of this policy and required to demonstrate compliance.

Our directors and senior management take responsibility for implementing this policy statement and its objectives and shall continue to provide adequate resources and investment to ensure that modern slavery is not taking place within the organisation nor within its supply chain.

### **Approval**

This statement has been approved by our board of directors who will review and update it as necessary on an annual basis.

Signed: Tom Allison



Chief Executive Officer  
**16<sup>th</sup> February 2024**