

# ANTI-MODERN SLAVERY REPORT 2023



**SPOTLIGHT**<sup>TM</sup>  
SPORTS GROUP

GOING ABOVE AND BEYOND THE ODDS

# STRUCTURE, BUSINESS AND SUPPLY CHAINS

Spotlight Sports Group Limited trading as Spotlight Sports Group, a company registered in England under company number 03387163.

Spotlight Sports Group is a global media and technology company specialising in sports betting content and data. With more than 500 staff, the business operates multiple award-winning brands, including Racing Post, the world's largest horseracing affiliate, Pickswise, the #1 post-PASPA affiliate in the US, myracing and Free Super Tips. Our other businesses in the group are ICS-digital and ICS-translate. Our global B2B division provides sports betting and fantasy sports content, including in-play, through the EGR award-winning Superfeed product. We also have media partnerships with leading global publishers, including The Arena Group.

**Responsibility for Anti Modern Slavery (AMS) rests with key individuals at all stages of the company:**

- The managers of the relevant departments who perform due diligence before signing contracts and subsequent yearly checks.
- The Director of Security who oversees mandatory training on this topic, and performs internal audits.
- The Chief Operations Officer (COO) who ensures sufficient resources, prioritisation, and reports to the board.

**Spotlight Sports Group is built on the foundations of the Racing Post, through a mixture of mergers and acquisitions, as well as offshoot companies. The full group includes the following companies:**

- Spotlight Sports Group Ltd (Racing Post)
- Apsley Group International Ltd
- Independent Content Services Ltd
- ICS-Digital LLP
- Bloodstock Media Ltd
- Raceform Ltd
- Fence Topco Limited
- Fence Bidco Limited

Spotlight Sports Group is owned by Exponent Private Equity LLP who originally acquired The Racing Post from a consortium of private investors headed by FL Partners in 2016.

As a primarily editorial content and technology company, our supply chain reflects that. Of our top 25 suppliers in 2023 (70%+ of our spend): 66% were a mixture of tech and content companies, with the rest being a mixture of printing, legal, professional services and office and working space related. Of these virtually all are UK companies or large multinationals, with one notable standout, a software development partner located within the European Union.

Despite sporting events having yearly seasons/cycles, the business does not operate in a seasonal manner, and there are no seasonal workers of any kind; all temporary workers/contractors typically last for the duration of an entire project.

Whilst we may not be able to know the full extent of Tier 2 suppliers, none of the companies we use operate in industries where modern slavery has been known to occur, being highly skilled labour, often requiring tertiary education.

As such we will be focusing our efforts on suppliers operating in areas identified as being at risk by the Gangmasters and Labour Abuse Authority.

### **Communication with third parties**

Spotlight Sports Group (SSG) primarily employs email communication as the main channel for interactions with its suppliers. This approach facilitates efficient and timely exchanges of information, orders, and updates. Additionally, the company places a strong emphasis on conducting due diligence on its suppliers. This practice ensures that the company engages in business relationships with reliable and reputable partners.

As part of our communication strategy, we have established a robust due diligence process to evaluate and select suppliers. This process involves assessing various factors, such as financial stability, ethical practices, quality standards, and alignment with our values. By conducting thorough due diligence, we aim to mitigate potential risks and maintain a trustworthy supplier base.

Spotlight Sports Group has designated vendor Point of Contact (POC) to streamline communication with suppliers in at-risk industries and other key stakeholders. This POC serves as a central liaison, responsible for facilitating effective communication, addressing queries, and resolving any issues that may arise. Having a designated POC enhances communication efficiency and ensures that all parties involved have a reliable point of contact for their interactions with the company.

Our content staff are represented by the National Union of Journalists. We have strong working relationships with their representatives and engage frequently on a range of matters, including those of employment and workers' rights.

# POLICIES

## Procurement Policy

Our Procurement policy, asks requesters to demonstrate that they have met 'value for money' criteria through an auditable purchasing process. There are a variety of different personnel potentially involved in the purchasing process, depending on size/type of purchase, and this enables us to ensure that segregation is kept and at least two different personnel are required to approve. Spotlight Sports Group is committed to conducting itself fairly, honestly and lawfully in all its business dealings and relationships.

## Anti Bribery & Corruption Policy

The purpose of this policy is to state Spotlight Sports Group's position on bribery and corruption and to provide information and guidance on recognising and dealing with bribery and corruption. It is the Spotlight Sports Group policy to maintain the highest standards of ethics in all of our business dealings. Spotlight Sports Group is bound by the laws of the UK, including the Bribery Act 2010 which governs our conduct both in the UK and worldwide.

## Anti Modern Slavery & Human Trafficking Policy

We have a dedicated Anti Modern Slavery policy which details our identified risk areas, as well as those that we have deemed to be not applicable or not at risk. For risk areas, the procedure for performing due diligence on potential vendors is outlined, as well as our commitment to continuously monitor for new developments and to train/educate all relevant members of staff so that they may better understand and identify potential situations. We also state our commitment to investigating any claims or reports of non-compliance as well as work with business partners to resolve any identified gaps, or find a replacement business partner.

All of our policies, including the ones outlined above are published on internal company websites and also communicated/referenced internally via our Learning Management System. Depending on seniority, department and role, these policies are considered mandatory training for key individuals, and their completion in a timely manner is tracked and monitored.

Our Third Party Security Policy policy mandates that all suppliers go through our due diligence checks and our AMS reviews are tied into this as a baseline, rather than being a separate, stand-alone process. However, suppliers in identified risk areas are given further scrutiny through separate due diligence checks.

# RISK ASSESSMENT, PREVENTION & MITIGATION

In order to drive an informed view on associated risks, Spotlight Sports Group (SSG) made heavy use of the information available from the Gangmasters and Labour Abuse Authority (GaLAA). Of the industries and domains listed by the GaLAA as being at risk, We conduct no business no matter how tangential in the industries of: Agriculture, Beauty Services, Car Washes, Cleaning, Construction, Domestic Work, Food Processing Packaging and Production, Food Service, Hotels and Accommodation, Manufacturing, Recycling and Waste Disposal, Shellfish Gathering, Textiles, Warehouse and Distribution.

As such, we have identified three key risk areas of:

## **Events**

SSG on occasions will organise events at certain races, festivals, and we also participate at certain industry events throughout the year. It would not be impossible for suppliers in this area to underpay, offer unacceptable working conditions or leverage payment deductions to ensure workers stay. The transient and transitory nature of these events also ties into the risk profile for this domain.

## **Transport & Courier**

The Racing Post newspaper and Betting Shop Display are significant products for SSG. The distribution for these relies on third party vendors that will transport the Racing Post newspaper from the printing presses to all major cities & locations. It would not be impossible for suppliers in this area to underpay, offer unacceptable working conditions or breaches of the daily driving limit in Great Britain for goods vehicles.

## **Retail & Sales**

SSG uses a dedicated third party to manage our relationships with shops and news-stands that sell the Racing Post newspaper throughout the UK. Given the nature of news-stands and other street kiosks, it would not be impossible for suppliers in this area to underpay, offer unacceptable working conditions or employ people that do not have the right to work.

The GaLAA industry profiles for each one of these areas were consulted to help inform questions that we include as part of our due diligence checks. This information is also used and referenced as part of our mandatory training to help people that may interact with third parties in these areas to better understand the risk profile.

Spotlight Sports Group does not have a separate risk register only for Anti Modern Slavery related risks, given the size of the companies, nature of the work, jurisdiction of activity.

The identified risks for each at risk industry are documented in our central risk register alongside all other risks; which is monitored and reviewed regularly.

Should a new risk be identified in the future, it will also be added to the risk register, and a response strategy will be recommended by the risk owner. In instances where there is lack of alignment between the Security, Governance, Risk & Compliance team and the proposed response, the risk and proposed approaches will be presented to the Security Governance Group that makes the final decision.

SSG maintains a close working relationship with the National Union of Journalists. Any and all risks identified by them are discussed internally and escalated as and where appropriate.

SSG also pays for a dedicated whistleblowing service allowing anyone working for any company within the group, and beyond, to raise an anonymous complaint that is then investigated.



# DUE DILIGENCE PROCESSES

Generally, when it comes to suppliers, business partners and third party risk, we have a tiered due diligence process where we ask questions to determine the existence of relevant corresponding policies, but we do not review them for content.

For suppliers in areas that we have identified as being at risk, we have a separate, dedicated AMS focused questionnaire.

As a baseline, we utilise a multi stage, tiered approach to due diligence taking into account criticality of the vendor, nature of services provided, the sum of the contract etc, leveraging the custom 200 item questionnaire that covers a multitude of topics including: Health & Safety, Human Rights, Worker Grievances, Diversity & Inclusion as well as whistleblowing, each question has a potential risk associated with it on a scale of 0-4, depending on the severity of the risk. We then sum up the worst possible answers considering this to be 100% risk and sum up the best possible answers considering this to be 0 risk%.

Of all the vendors reviewed in 2023 we have an average of 16.67% and the median of 19.05%.

These results are then contextualised based on industry country of origin etc. The most common failure encountered were vendors not doing Anti modern slavery related checks on their sub suppliers. Given the fact these vendors are primarily providers of tech, tools and services, raw data and or content, we have not deemed this as a significant risk and have not discounted any vendors based on this reason. Should a risk be identified in the future it will be added to our existing risk register to be monitored monthly and reviewed at least quarterly.

As an additional step, where we have a relationship with a vendor from one of the industries that have a high risk for anti modern slavery ( i.e events, retail and distribution), we have prepared dedicated AMS focused questionnaires based on the guidance from the Gangmasters and Labour Abuse Authority. These are different for each industry to help us determine the risk rating of each specific third party. Moving forward, the intention is for these questionnaires to be updated yearly rather than just during the initial assessment of potential new vendors in at-risk areas.

## Risk

Where due diligence identifies a risk, it is communicated to the manager/owner of the project, and in the majority of cases, alternative vendors/third parties are pursued. Where that is not possible/feasible, a dedicated risk is raised in the risk register, which details what will be done to mitigate the risk in the short term and what the intended actions are as a long term response to the risk.

Once created these risks fall under the normal risk monitoring and review cycle.

All risk is assessed monthly, with total number of risks, their severity, the initial risk exposure as well as current post mitigation exposure across the business all tracked and reviewed monthly by a dedicated Security Governance team that has senior level representation from across all key areas of the business.



# EFFECTIVENESS

The primary goal for SSG at this point in time is to increase awareness and participation in our Anti Modern Slavery efforts from the wider business.

**In pursuit of this goal we have:**

- Reviewed and extended the involved individuals beyond those specialised in matters of compliance and governance to include department heads for areas that could have contact with the industries we identified as being at risk, as well as middle managers and the individuals most likely to be involved in the risk areas identified.
- We have expanded the capability of our learning management system to require dedicated courses for the individuals involved.
- We have created dedicated questionnaires aimed at each specific industry identified as being at risk.

**Moving forward, the intention is to track the following KPIs:**

- Training & Awareness: Completion of mandatory AMS training as a percentage of all individuals involved.
- New vendors identified as operating in at-risk industries, expressed as a percentage of all new vendors that due diligence was performed on.
- Enhanced ASM Due Diligence: Yearly completion of dedicated AMS questionnaire for vendors and third parties identified as being in one of our at-risk industries, as a percentage of such vendors.
- Average risk per vendor operating in at risk areas, based on the answers from the dedicated questionnaire, expressed as a percentage.

# TRAINING & CAPACITY BUILDING

At SSG we handle mandatory awareness around our policies, as well as awareness training using a dedicated Learning management System. Mandatory courses are assigned based on the role, team, level of seniority, etc, and includes Anti Modern Slavery (AMS) as a dedicated course (amongst other topics such as Anti Bribery, Equality & Diversity). Special reports offer visibility to managers and staff alike around what courses are mandatory for them, as well as what has been completed, and this is checked yearly as part of internal audits.

As part of our risk assessments we have identified the industries in which we operate that could be at risk. Top managers/directors, as well as individuals responsible for handling the day to day operations in those areas, are included in a dedicated group for AMS training. Everyone in this group has the relevant courses automatically assigned to them, and cannot discharge them. Membership of the group is reviewed at least yearly. At this time we do not participate in any external/further training.

The training provides a high level overview of our existing policy and its scope, an overview of how and why people could end up in a modern slavery situation, the most common signs that could indicate a modern slavery situation, the most common types of modern slavery, areas/industries that we have deemed to not be at risk for us, and those that we have identified as risky.

As part of this we also include the information sheets provided by the Gangmasters & Labour Abuse Authority, for industries in scope.

At this time we do not assess, grade, or score people on knowledge, understanding or skills in this area. Due to the low risk identified, and the very small number of people involved, it is deemed sufficient that people are made aware. Yearly due diligence checks on suppliers ensure that Anti Modern Slavery is not forgotten about, and the training is always available on hand should a refresher be warranted.

This statement covers the financial year ended 31 December 2023.

This statement was approved by:

- Security Governance group on 10 January 2024
- Mark Renshaw (Chief Executive Officer) on 15 January 2024
- The board of directors on 31st January 2024