



# MODERN SLAVERY TRANSPARENCY STATEMENT

## 1. Scope

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 (the "Act") and sets out the steps which Winvia Entertainment plc (company number 03755182) (the "Company") has taken during the financial year ended 31 December 2024 to prevent modern slavery from occurring in its operations and supply chain.

## 2. Commitment

The Company and its subsidiaries from time to time (together, with the Company, the "Group") is committed to acting ethically and with integrity in its business dealings and relationships and to implementing and enforcing effective systems and controls in accordance with the Act to ensure modern slavery is not taking place anywhere in the Group.

## 3. Business overview and supply chain

- 3.1 The Company is a UK-based online business which forms part of a European-wide Group specialising in prize draws and skill games. The Group comprises companies incorporated in Cyprus, Gibraltar, Italy, Malta, Romania and the United Kingdom.
- 3.2 As a UK Company operating gaming software and technology, with support from a predominantly technology-based supply chain, human and labour rights and modern slavery issues do not pose the same level of risk for the Company as it does for those in manufacturing or industrial sectors. The Company therefore considers that this risk is relatively low.

## 4. Modern slavery framework

- 4.1 Policies and frameworks that the Group has in place assist in limiting the risk of modern slavery in the workplace and encourage our people to work ethically and with integrity, and to assist in the prevention, detection and reporting of modern slavery in any part the Group or our supply chain.

4.2 The Group's Modern Slavery Policy applies to all persons working for us or on our behalf in any capacity, including (but not limited to) employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, supply chain participants and business partners.

#### Supply chain

4.3 The Company expects the same high standards from all of our contractors, suppliers and other business partners and that our suppliers will hold their own suppliers to the same high standards.

4.4 The Company has established the following processes which are designed to (i) identify and assess the potential risk areas in our supply chains, (ii) mitigate against any risks identified (iii) monitor such potential risk areas and (iv) protect whistleblowers:

- (a) Our suppliers are engaged on an appointment only basis which helps us confirm that they have policies in place to ensure that they also comply with their legal obligations and that they undertake the necessary checks in their organisations and supply chains with regards to slavery and human trafficking.
- (b) Our suppliers are aware of their responsibility for ensuring their employees and suppliers involved in the supply of goods or services to us understand and comply with this policy.
- (c) Modern Slavery forms part of the Company's wider risk assessment and related risks are reviewed twice per year.
- (d) We have a dedicated Compliance Officer who is responsible for the day-to-day implementation of the Group's Modern Slavery Policy, monitoring its use and effectiveness, dealing with any queries and maintaining internal control systems and procedures to address the risks of Modern Slavery.
- (e) The Company's Board of Directors retains overall responsibility for ensuring the Group's Modern Slavery Policy complies with the Group's legal and ethical obligations.

#### Employees

4.5 The Company has, at the time of writing approximately 27 number of direct employees and undertakes employment document checks to ensure that these employees reside in the UK legally.

4.6 Employees can raise any concerns, including those with respect to modern slavery, using the Group's whistleblowing policy.

**5. Monitoring and reporting to date**

5.1 In 2024, the Group monitored and tracked potential human rights and modern slavery issues. No issues of concern were identified. The Group intends to do the same in 2025. This statement will be reviewed on a yearly basis.

5.2 The Group commits to investigate, address, and give remedy to affected parties where the Group has been found to have caused or contributed towards human rights violations.

5.3 This statement has been approved by the Board of Directors and signed by the Chairman of the Board, Jo Bucci, on 26 November 2025.

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