

MODERN SLAVERY STATEMENT
LUXURY LEISURE AND RAL LIMITED
For 2018

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 (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 2018.

Our Business

We are a leading operator of amusement centres in the UK. 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 councils 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. 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.

Our Policies

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

- This modern slavery statement;
- Whistle-blowing policy;
- Business partner due diligence policy and compliance screening; and
- Novomatic Group Code of Conduct.

Risk Assessment

We operate solely in the regulated UK market and with limited supply chains. As such we believe our exposure to the risks of modern slavery is low, but we are alert to the possibility that such practices can exist anywhere.

Employment Practices

We adopt robust recruitment processes and have a comprehensive suite of employee responsibility policies. 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.

Our Supply Chain

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. Our major suppliers are reviewed for evaluation of risk and a self-assessment questionnaire will be part of our ongoing due diligence process for them. That action may result in us deciding not to establish a relationship with a new supplier or the termination of an existing relationship. In any case, we will assess any instances of non-compliance on a case by case basis and tailor remedial action appropriately.

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. We are developing a module for our employee E-Learning platform.

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

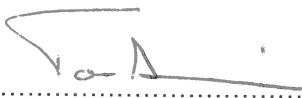
Our directors and senior management take responsibility for implementing this policy statement and its objectives and shall continue to provide adequate resources and investment to ensure that modern slavery is not taking place within the organisation nor within its supply chain.

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

Managing Director
March 2019



.....