

MODERN SLAVERY STATEMENT for 2018

BELL-FRUIT GROUP LIMITED

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. Bell-Fruit Group Limited (referred to as “we”, “us” or “our”) has 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 manufacturer and supplier of gaming machines and game software content in the UK and also to some export markets. We operate within a highly regulated environment and are approved by the UK Gambling Commission which has issued us with licences to operate and by other overseas gaming authorities as required.

We are part of the Novomatic UK group of companies and do not have intricate supply chains. Our suppliers in the main supply gaming machines and gambling related products/components. Our gaming suppliers are mainly Group companies and include overseas members of the Novomatic group, which are licensed by the Gambling Commission as required. Our other suppliers are providers of components, services or works to support day-to-day management of our manufacturing facility.

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 in regulated markets and with limited supply chains. Suppliers of non-specialist components are mainly local and are known to us - in some instances for lengthy periods of time. 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 the age of 18.

Our Supply Chain

Our major suppliers are reviewed for evaluation of risk and a copy of their modern slavery statements are obtained from them. Alternatively, or additionally, a self-assessment questionnaire will be part of our ongoing due diligence process for them.

We will assess any instances of non-compliance on a case by case basis and tailor remedial action appropriately. That action may result in us deciding not to establish a relationship with a new supplier or the termination of an existing relationship.

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.

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: Stephen Howlett

Director



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