

WEBIS HOLDINGS PLC

ANTI MODERN SLAVERY POLICY STATEMENT

Modern slavery is a heinous crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another brutally to exploit them for personal or commercial gain. It is the great human rights issue of our time.

Business must not be knowingly or unknowingly complicit in this horrendous and sickening crime.

The Group has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships both with our staff and our suppliers, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners.

The Group's Structure and its Business Supply Chains

Webis Holdings plc is a holding company with subsidiaries operating in the gaming and technology sectors. The company is listed on the Alternative Investment Market in London and operates from offices based in Douglas, Isle of Man, Lexington, Kentucky and San Francisco Bay Area, California and a racetrack in Sacramento, California.

Industries that are particularly at risk of Modern Slavery are labour intensive and characterised by a high proportion of migrant workers undertaking unskilled and irregular work.

As the Group is engaged in the gaming and technology sectors, and in general our workforce is highly skilled due to the technical and highly regulated nature of our offering - we have a relatively small supply chain, particularly due to the online nature of our core product. Our supply chain is largely characterised by the purchase of professional services, IT and technology related services, customer payment services and insurance. Therefore, due to the nature of our business and the skill levels required from our employees and business partners, we believe that we are at a very low risk of being complicit in Modern Slavery. Nonetheless, the Group has implemented important measures to check for, and prevent, any possible Modern Slavery practices within our own business and supply chains to ensure that neither we, nor our suppliers, are engaged in such practices.

The Group has locations in the Isle of Man and the United States. These locations are primarily consumers of goods and services from a number of mainly local suppliers in fields such as cleaning, and office supply deliveries, in addition to building maintenance, rent, insurance and racetrack associated services. Other than governmental suppliers and public utilities, which it is believed would already undergo a high level of scrutiny, the Group acknowledges that there could be a small risk that some such commercial suppliers could engage in Modern Slavery and therefore the Group will apply regular risk assessment and due diligence to such suppliers.

Modern Slavery Act Statement

The Group is committed to upholding recognised human rights through the way we operate. We have an 'Anti-Slavery and Human Trafficking Policy' ("Anti-Slavery Policy") in place which demonstrates our

commitment to trading ethically and fairly. We are also committed to improving our practices to ensure we effectively combat slavery and human trafficking from occurring within our business and our supply chain. We require the same high standards from our suppliers, contractors and other business partners.

Our Commitments and Policies

Our anti-slavery commitments (contained in our Anti-Slavery Policy) reflect our requirements to act ethically and with integrity in all our business relationships. These commitments also require us to implement effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have zero tolerance of slavery and human trafficking. So as part of our initiative to identify and mitigate the risk of slavery and human trafficking taking place in our business, we have in place systems and policies to:

- Identify and assess potential risk areas and unethical behaviour
- Ensure that we only work with suppliers who adhere to similar principals and ethical guidelines
- Mitigate the risk of slavery and human trafficking occurring
- Protect whistle blowers
- Investigate all claims of unethical behaviour

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

This Statement has been approved by the Board of Directors of Webis Holdings plc.

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