

## **Modern Slavery and Human Trafficking Statement Financial Year 2026**

### **Introduction**

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Cowells-Arrow Bingo Company (UK establishment) (“**Cowells-Arrow**”) to prevent modern slavery and human trafficking in its business and supply chains.

Cowells-Arrow is part of the Arrow International, Inc. group of companies (“**Arrow**”). Arrow is committed to acting ethically and with integrity in all business dealings and relationships and to implementing effective systems and controls to help ensure that modern slavery and human trafficking are not taking place in our business or supply chains.

This statement applies to the activities of Cowells-Arrow in the United Kingdom and should be read alongside the Arrow’s Anti-Slavery and Human Trafficking Policy.

### **Organisational Structure**

Cowells-Arrow Bingo Company is a UK establishment of Arrow International, Inc., a company incorporated in the United States. Cowells-Arrow is registered at Companies House as a UK establishment (No. FC016845) and operates from Unit 2 Lovetofts Drive, Ipswich, IP1 5SF.

Arrow International, Inc. is the parent company which operates internationally in the charitable gaming sector as a manufacturer and distributor of charitable gaming supplies. The UK establishment conducts its business activities in the United Kingdom and is supported by group-wide policies and governance frameworks implemented by Arrow International, Inc.

### **Our Business and Supply Chains**

Cowells-Arrow’s UK activities include (i) manufacturing and distribution of bingo tickets and charitable gaming products and (ii) supply of amusement and gaming machines to pubs, clubs and licensed premises in the United Kingdom. Cowells-Arrow’s supply chains primarily include:

- suppliers of gaming and related equipment and component parts;
- logistics and transport providers;
- suppliers of printing materials; and
- professional advisers and other business service providers.

We recognise that supply chains in certain sectors and jurisdictions may present a higher risk of modern slavery and human trafficking and seek to manage those risks proportionately.

### **Policies**

Cowells-Arrow is committed to ensuring that there is no modern slavery or human trafficking in its business or supply chains. As a UK establishment of Arrow International, Inc., Cowells-Arrow operates in accordance with group-wide policies and governance frameworks designed to promote ethical conduct and compliance with applicable laws.

Arrow Anti-Slavery and Human Trafficking Policy sets out our zero-tolerance approach to modern slavery and human trafficking. It applies to employees, officers, directors, contractors and business partners and establishes expectations regarding ethical conduct, supply chain standards, reporting and remediation.

Arrow maintains a confidential reporting process that enables individuals to raise concerns about suspected misconduct, including concerns relating to modern slavery and human trafficking, without fear of retaliation. Reports may be made through a third-party operated reporting mechanism.

These policies are reviewed periodically and updated as necessary to reflect legal developments and best practice.

### **Risk Assessment and Due Diligence**

#### Assessing Risk:

Cowells-Arrow recognises that modern slavery risks may arise both within direct operations and within supply chains. As a UK establishment of an international group operating as a manufacturer and distributor of charitable gaming supplies, we consider our direct employment activities in the United Kingdom to present a relatively low risk of modern slavery due to established employment practices and regulatory oversight. However, we recognise that certain supply chain activities (particularly those involving manufacturing, component sourcing, logistics or operations in higher-risk jurisdictions) may present an elevated risk. We therefore adopt a risk-based and proportionate approach to assessing and managing those risks.

#### Due Diligence:

In line with the Arrow Anti-Slavery and Human Trafficking Policy, Cowells-Arrow undertakes due diligence measures which may include:

- assessing new suppliers prior to engagement and reviewing business practices and regulatory compliance;
- incorporating contractual provisions requiring compliance with all applicable laws;
- requesting confirmation from suppliers that they maintain appropriate policies and procedures; and
- taking appropriate action, including remediation or termination of relationships, where concerns are identified.

Supplier relationships may be reviewed periodically, and concerns raised through reporting mechanisms are assessed promptly and investigated where appropriate.

### **Training**

Cowells-Arrow recognises that awareness is an important component in preventing modern slavery and human trafficking. Relevant employees have access to Arrow's Anti-Slavery and Human Trafficking Policy and are expected to be alert to indicators of modern slavery within the business and supply chain. Employees are encouraged to report concerns through established reporting channels.

Where appropriate, training may be provided to personnel involved in procurement, supply chain management or recruitment activities to support the identification and management of modern slavery risks.

### **Monitoring and Evaluation**

Cowells-Arrow seeks to monitor and evaluate the effectiveness of its anti-slavery measures through:

- oversight by senior management of compliance with applicable policies;
- review of concerns raised through reporting mechanisms; and
- periodic review of supplier relationships and contractual compliance.

This statement will be reviewed annually and updated as appropriate.

### **Approval**

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Cowells-Arrow Bingo Company's modern slavery and human trafficking statement.

Approved by the Chief Legal Officer and Secretary of Arrow International, Inc.

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**Jennifer L. Gehrlein**  
Chief Legal Officer and Secretary  
For and on behalf of Arrow International, Inc.