

Entain Group Speak Out Policy (Whistleblowing)

The Quick Read

- Anybody can report something they think may be illegal, unethical or breach our code of conduct.
- Suspicions can also relate to a third-party partner or supplier.
- Day-to-day work-related problems or complaints and personal HR-related issues should normally be dealt with using our grievance process or with your line manager.
- You do not have to be 100% sure or prove misconduct, so long as you have a reasonable suspicion it has taken place or might take place.
- If you raise a genuine concern, you will be protected from detrimental treatment even if it turns out that no misconduct took place. Malicious or deliberately false reports may be dealt with under our disciplinary procedure.
- Reports will be treated confidentially unless you consent to us disclosing your details or we are legally required to disclose your identity (e.g. to the police or a court).

Our Policy

Our policy reinforces how seriously we take all allegations of malpractice and misconduct across the business. Speak Out should be used to report serious misconduct (or suspected misconduct) involving company employees or people who work for us in any capacity (whether third party suppliers, consultants or agents).

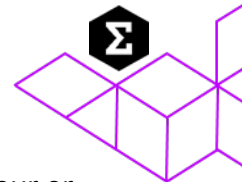
Responsibilities

We do our best to resolve all work-related issues fairly and quickly, and your concerns are dealt with confidentially and sensitively. If you see behaviour that might be illegal, unethical or that breaches our code of conduct, please speak out and let us know as soon as possible.

We can only investigate a possible breach if we know about it. **Some examples of the behaviour that you should report is:**

- Violation of laws or regulations, including matters such as data protection or industry-specific rules such as gambling or AML regulations
- Abuses of position for personal gain or the benefit of friends and family, including hospitality, gifts or other incentives
- Fraud or theft of company money or assets
- Modern slavery issues including paying fees to obtain jobs at Entain, poor labour practices such as unreasonable working hours or pay, or experiencing poor working conditions
- Bribery or similar corruption for personal or business gain
- Sexual Harassment, including by staff, colleagues, suppliers or customers
- Unsafe working environments or breaches of health and safety or negative impacts on the environment
- Non-compliance with our policies or code of conduct, including incidents where any colleague is treated with a lack of equality and respect

All employees who raise a concern will be protected if it has been done in good faith, regardless of whether the concern turns out to be genuine or not. Since we will protect your identity the chance of detrimental treatment being received as a result of raising a concern is extremely low, but will be treated as a serious disciplinary matter if it is found to have occurred.



Raising your concerns

You can raise issues you are experiencing yourself, or if you have concerns about the behaviour or welfare of your colleagues. Speaking up for others is particularly important if you are worried about colleagues experiencing unethical behaviour or being potential victims of modern slavery.

There are a few ways to report something:

Your manager or HR

For employees, your first port of call should be your line manager or the HR team, who will try to resolve any issues in the first instance outside of whistleblowing. Day-to-day work-related problems or complaints should normally be dealt with using our grievance process. Grievance matters reported via the whistleblowing route will be referred to HR for investigation in the first instance.

Report by the dedicated EMAIL mailbox

The Audit Committee (a committee of the Board) has set up a secure, confidential mailbox for anybody who wants to raise a concern in writing. You may report to this address in whatever language you find most convenient. Send your report to the email address: whistleblowing@entaingroup.com.

Independent hotline and web/mobile reporting portal

There may be occasions when raising the matter internally might not feel like the right thing to do, for example where your concern relates to criminal offences or a serious breach of our legal or regulatory obligations, or you are worried about staying anonymous.

For this reason, we have an independent hotline and web/mobile reporting channel provided by Whispli, which is available all year round, 24 hours a day, 7 days per week.

Web: <https://entain.whispli.com/speakout>

Whispli enables you to easily raise your concern in multiple languages. There is dedicated step-by-step guidance available on the reporting channel in your chosen language. In addition, phone numbers are available across locations where Entain is based and can be found in our Speak Out Guidance along with further information about the process.

Where can you go for help?

If you have any queries about this policy, employees should speak to your line manager in the first instance or you can contact the policy owner on whistleblowing@entaingroup.com.

The Audit Committee has overall responsibility for this policy but has delegated day-to-day responsibility for implementation and oversight to Group Internal Audit with additional oversight from Group Legal when appropriate. The policy should be read in conjunction with the guidance document.

Who does this policy apply to?

This policy applies to everyone working for, or on behalf of, Entain plc and its wholly or majority owned subsidiary companies and joint ventures, such as directors, employees, consultants or self-employed contractors.

Policy Owner: Audit Committee/Director of Internal Audit

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Classification: Public

Tier: 1

Public

Tier 1 Policy

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