

Entain Group Human Rights and Modern Slavery Policy

Our Policy

The principles of fair play, honesty and integrity underpin everything we do at Entain. It is our policy to conduct our business in a manner which respects the rights and dignity of all people, complying with all legal requirements and ensure that modern slavery in all its forms and human rights abuses do not occur in our business or in our supply chains.

Further detail on how we identify, assess and mitigate the risk of modern slavery and human rights abuses in our operations and supply chains is set out in our annual modern slavery statement, available [here](#).

This Policy should be read in conjunction with our Code of Conduct, Data Protection Policy, Recruitment Policy, Diversity, Equity and Inclusion Policy, Bullying, Harassment and Victimisation Policy and Grievance Policy.

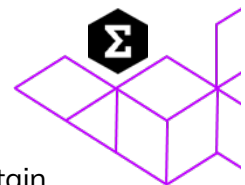
Guiding principles

- We acknowledge and respect internationally recognised human rights as set out in the International Bill of Human Rights and the core labour standards as detailed in the International Labour Organisation's human rights conventions.
- In meeting our responsibilities to respect and safeguard human rights, we consider relevant international human rights standards, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the human rights chapter of the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
- We also recognise and adhere to the Ethical Trade Initiative's Base Code.

Responsibilities

Entain must:

- Champion physical and psychological safety across all Entain operations and places of work.
- Treat everyone who works for Entain fairly, equitably and without discrimination and respect the rights and dignity of all our colleagues.
- Provide satisfactory labour rights and working conditions in accordance with local legal requirements, and only do business with suppliers and business partners who commit to the same.
- Respect and protect the data privacy of our employees, business partners and customers.
- Abide by applicable domestic laws to uphold freedom of association by respecting colleagues' rights to join, form or not join a labour union without fear of reprisal, intimidation, or harassment.
- Facilitate open and constructive resolution processes and dialogue with our colleagues and, if applicable, their representatives.
- Implement appropriate remediation processes for victims where human rights violations or modern slavery have been identified, either within Entain's operations directly or within our supply chains.
- Foster a speak-up culture and implement effective grievance processes.



We must:

- Establish and communicate our human rights and modern slavery expectations to Entain colleagues and third-party business partners through our Code of Conduct and our Supplier Code of Conduct.
- Develop, implement, maintain, and comply with internal policies, procedures and processes covering:
 - Health, safety, security, and the environment
 - Speak-up and concerns management
 - Equal opportunity and non-discrimination
 - Anti-bullying, harassment, retaliation, and victimisation
 - Labour rights and working conditions
 - Data privacy
 - Freedom of association
 - Third party due diligence
 - Recruitment.
- Embed human rights and modern slavery considerations into relevant risk assessment processes.
- Complete all mandatory training by the completion date.

We must not:

- Knowingly prioritise or engage in business activity that would adversely impact upon or restrict the well-being, dignity and basic rights and freedoms of our colleagues, the workers in our extended supply chains, and the communities in which we live and operate.
- Knowingly use forced or compulsory labour in our business or supply chains, i.e. any work or service that a worker performs involuntarily or under threat of penalty.
- Use or permit the use of recruitment fees.

Where can you go for help?

If you have any queries about this policy, please speak to your line manager, the People Team or you can contact Ethics & Compliance on ethics@entaingroup.com. You can also get further guidance on the [Ethics@Entain](#) and [Modern Slavery](#) pages on Entain.Me.

Raising your concerns

If you suspect a breach of this policy has occurred or may occur in the future, raise it with your line manager, the People team or the Legal team in the first instance. If that is not possible, please use our [Speak Out Policy](#) and let us know.

You will not face any adverse consequences for raising a genuine concern in good faith, even if you were mistaken about your concern. Retaliation against a colleague making a genuine report is not tolerated.

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.

We take breaches of our policies seriously. Failure to comply with this Policy may result in disciplinary action.

Policy Owner: Group General Counsel

Date: January 2024

Next Review Date: January 2025

Public

Tier 1 Policy