

## Supplier Code of Conduct



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# Introduction and Scope

## A message from our Interim CEO



“Entain plc (LSE: ENT) is a FTSE 100 company and one of the world’s largest sports betting, gaming and interactive entertainment groups, operating in regulated and regulating online and retail markets. With licenses in more than 40+ territories with 30+ iconic brands, Entain employs more than 29,000 people in 20+ offices across five continents.

We aim to meet the highest standards in everything we do, from the way we run our business and manage our financial affairs, to how we support our people, our customers and the communities we work in.

Some of those standards are legal requirements but others simply depend on acting honestly, openly and with integrity. Our business is founded on fair play. One of our corporate values is ‘do what’s right’ and this is something we expect of all business partners we work with.

This Supplier Code of Conduct (“Code”) outlines the standards, principles and policies that Entain expects everyone who does business with us as a supplier, third-party or business partner anywhere in the world to adhere to. We have decided to go one step further by aligning this to the [United Nations Sustainable Development Goals](#) (“SDGs”).

We strongly encourage you to exceed the requirements of this Code, align to the SDGs, and promote best practice and continuous improvement throughout your operations and third-party relationships.

If you are new to working with Entain, you must read and agree to this Code during your onboarding with Entain. This Code will be reviewed regularly and may be amended from time to time (with any amendments notified to business partners via email). This Code is available on our corporate [website](#) for viewing at any time. We encourage you to take the time to read the Code and familiarise yourself with our expectations.

Where a Supplier is referenced under this Code, it is automatically deemed to include a third-party, business party or supplier and their officers, subsidiaries, affiliates, employees, third-parties, business partners, subcontractors, agents, consultants and/or recruitment agencies (as applicable). The term Entain as used in this Code refers to all brands, subsidiaries and affiliated undertakings of Entain plc anywhere in the world.

By entering into a business relationship with us, you are deemed to have accepted the obligations set out in this Code and agree to comply with it, in addition to any of your contractual and other obligations. We expect you to maintain records to evidence your compliance with this Code as any breach of the obligations stipulated in this Code may be considered a material breach of contract by you.”

**Stella David**  
Interim CEO, Entain plc

## Guiding Principles

Our success and our reputation depend on how we conduct ourselves as individuals and as a business. It is our intention as an

organisation to act honestly, openly and with integrity in everything we do, and we expect everyone we work with to do the same.

This Code sets out the principles we expect all those that work with Entain to follow. This broadly covers Environment, Employment & Human Rights, and Corporate Governance behaviours. Ultimately, we expect:

- a) Honest and ethical conduct.
- b) Compliance with applicable laws, regulations and codes of practice applicable to your business and the goods and services being provided to Entain (if there is a conflict between the Code and local law, whichever has the higher standard must be followed).
- c) Protection of confidential, personal and proprietary information.
- d) Personal accountability.
- e) Prompt reporting of any actual or potential breaches of the Code.
- f) Support of the 10 principles of the [United Nations Global Compact](#) (underpinned by the [UN Universal Declaration of Human Rights](#), and the [1998 International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work](#)) which requires that Businesses should:
  1. Support and respect the protection of internationally proclaimed human rights; and
  2. Make sure that they are not complicit in human rights abuses.
  3. Uphold the freedom of association and the effective recognition of the right to collective bargaining.
  4. Uphold the elimination of all forms of forced and compulsory labour.
  5. Uphold the effective abolition of child labour; and
  6. Uphold the elimination of discrimination in respect of employment and occupation.
  7. Support a precautionary approach to environmental challenges.
  8. Undertake initiatives to promote greater environmental responsibility.
  9. Encourage the development and diffusion of environmentally friendly technologies.
  10. Work against corruption in all its forms, including extortion and bribery.

### United Nations Sustainable Development Goals

The Sustainable Development Goals (SDGs) were adopted by the United Nations in 2015 as a universal call to action to end poverty, protect the planet, and ensure that by 2030 all people enjoy peace and prosperity. The SDGs are designed to end poverty, hunger, AIDS, and discrimination against women and girls. See our signposting throughout the Code to show which pillars each element of the Code aligns to. You can read more [here](#).

### Other Entain Corporate Policies

This Code is to be read in conjunction with, and is subject to, Entain corporate policies found [here](#).

### Audit

You are expected to review and monitor your compliance with this Code. We reserve the right to verify any supplier’s compliance with this Code (as well as your suppliers) by conducting an audit (either by Entain or an authorised third-party).

### Breaches of the Code

Entain will expect you to take corrective actions to remediate the breach. For major or persistent non-compliance, or unjustified refusal to provide required information, Entain may immediately suspend or terminate any contract between you and Entain.

# Our Expectations

## 1. Environment SDG Pillars 12, 13, 14 and 15

We have a [Net Zero by 2035](#) ambition and expect you to share our commitment to comply with all environmental laws and regulations that apply to any goods and/or services that are supplied to Entain, and how they are manufactured and disposed of.

We may engage with you to identify opportunities for improving the environmental sustainability of your goods and/or services, your office/premises buildings and/or your operational procedures, such as; to improve energy efficiency, source renewable energy, prevent pollution via waste management, use Forest Stewardship Council (FSC) certified paper, to highlight environmental labels/certifications or ISO standards, implement other specific carbon reduction initiatives or have a zero deforestation commitment. We expect you to respond accordingly with the end-goal to minimise energy consumption and greenhouse gas emissions.

Ultimately, we expect you to:

- 1.1 Implement, maintain and continuously improve your environmental management systems, policies and procedures.
- 1.2 Identify, manage and reduce greenhouse gas emissions from your own operations (scope 1 & 2 emissions) and supply chain (scope 3 emissions).
- 1.3 Monitor, report and set realistic and progressive targets on your environmental performance.
- 1.4 Raise environmental awareness in your organisation through communication, engagement and training programmes.
- 1.5 Help your employees and partners understand how they can personally make a difference to your environmental performance.
- 1.6 Embed sustainability into the work you do and recognise the part you play in our environmental management performance.

## 2. Employment and Human Rights

SDG Pillars 1, 3, 4, 5, 6, 8 and 10

We take our legal responsibilities seriously and strive for the best standards in employment and human rights. We firmly believe that a robust approach to modern slavery and best standards in employment and human rights are ways that we can act as a positive contributor to the communities in which we work and to society at large and expect you to share that. You therefore must:

### Child Labour

- 2.1 Adhere to [UNICEF's Children's Rights and Business Principles](#) and the [ILO's Minimum Age Convention](#) and not use child labour under any circumstances in your provision of goods and/or services to us. You must abide by national laws, ensure your supply chain does not utilise child labour and have adequate procedures and measures in place to prevent this.

### Forced Labour

- 2.2 Abide by the [International Labour Organisations \(ILO\) definition](#) of forced or compulsory labour and not use any forced labour including bonded, prison, slave or human trafficked labour or any labour conducted under duress. You must ensure that you are not directly or indirectly involved in any form of forced, abused or involuntary labour through threat, force, fraudulent claims, penalty or other coercion. All workers must have the freedom to terminate their employment contract in accordance with established national laws without unlawful penalty.

### Wage and Benefits

- 2.3 Pay your workers at least the legal national minimum wage – and we encourage you to pay the real living wage – and comply with all applicable wage laws. All workers shall be

provided a clear, timely and transparent payroll statement that provides sufficient information to verify accurate wages with no wage deduction as a disciplinary measure. Provide benefits to workers that meet legal minimum standards and not unfairly deduct any qualifying benefits from the wages of workers. We expect you to not use temporary contracts to deny your workers employment rights that would otherwise be gained via permanent employment.

### Working Hours

- 2.4 Ensure that workers do not exceed 60-hours of work per week (48-regular hours and 12-hours of voluntary overtime) with a rest period of at least 24-hours every seven days and no exceptions to these requirements or they are clearly defined and allowed by local, national laws and workers agreements. Any overtime worked should be voluntary and paid in accordance with either the ILO's recommendations of 1.25x basic pay (premium/higher rate) or local and/or national law.

### Freedom of Movement

- 2.5 Not unreasonably restrict workers' freedom of movement by physically confining workers to the workplace or accommodation, or by workers entering or exiting the workplace or accommodation. You must ensure that they have adequate procedures in place to ensure and check that any person you employ has the legal right to work in the applicable jurisdiction.

### Diversity, Equity and Inclusion

- 2.6 Value diversity and protect the health, safety and wellbeing of their employees and workers. Your workers must be free from harassment, and you must never discriminate, at any stage of employment, against any individual on the basis of age, gender, gender identity, race, religion, national origin, migrant status, sexual orientation, disability, or any other classification protected by applicable law.

### Freedom of Association and Collective Bargaining

- 2.7 Respect the rights of workers to exercise free association including joining an association representing workers' rights of their choosing, and bargain collectively without interference or discrimination, recognising the importance of communication between management and workers with regards to working conditions without fear of intimidation, harassment or penalty.

### Health and Safety

- 2.8 Provide your employees with safe, clean and healthy work environments and comply with all relevant national laws and regulations for health and safety at work.
- 2.9 Understand the different health and safety risks in your business and take preventative action to minimise the cause of potential hazards in the working environment and implement controls to protect workers.
- 2.10 Document your arrangements for complying with relevant health and safety legislation along with your risk assessments and will provide this documentation upon request.

## 3. Corporate Governance SDG Pillars 16 and 17

All those that work with Entain must conduct their business activities with integrity and in full compliance with applicable laws and regulations in all locations where they operate when doing business with and/or on behalf of Entain. You must:

### Anti-Bribery and Corruption

- 3.1 Have a zero-tolerance for all bribery and corruption, in whatever form, anywhere in the world.
- 3.2 Have a risk based and proportionate framework of adequate procedures, policies and/or codes of conduct to prevent

# Our Expectations (continued)

bribery (which extends to representatives acting on your behalf).

- 3.3 Comply with all applicable anti-bribery and corruption laws (including those related to lobbying, gifts, hospitality, charitable and political donations and payments to public officials, and other related regulations).
- 3.4 Never offer or accept anything of value in order to obtain any undue or improper advantage or to influence the recipient to act in breach of his or her professional duties.
- 3.5 Never attempt to improperly influence Entain decisions, for instance by offering a bribe or kickback in order to obtain or retain Entain business or preferential treatment.

## Gifts, Hospitality and Donations

- 3.6 Never give or receive inappropriate gifts, hospitality or donations.
- 3.7 Only provide gifts, entertainment and hospitality if they serve a genuine business purpose and are of appropriate type (i.e. not cash), value, timing and frequency (to manage this, we strongly encourage you to have a means for internally recording gifts, hospitality and donations given and received).

## Conflicts of Interest

- 3.8 Avoid giving the appearance of engaging in an actual conflict of interest (to manage this, we strongly encourage you to have a means for internally recording actual, potential or perceived conflicts of interest).
- 3.9 Maintain the highest possible standards of integrity in your business relationships and never use authority or position for personal gain.
- 3.10 Promptly register any actual, potential or perceived conflict of interests that relate to Entain, and if the conflict cannot be avoided, to contact [ethics@entaingroup.com](mailto:ethics@entaingroup.com).

## Anti-Facilitation of Tax Evasion

- 3.11 Have a zero-tolerance for all tax evasion and the facilitation of tax evasion, in whatever form, anywhere in the world.
- 3.12 Never engage in the facilitation of tax evasion as part of your work for or on behalf of Entain, or otherwise engage in any conduct which might result in liability for Entain under the [Criminal Finances Act 2017](#).

## Competition and Antitrust

- 3.13 Conduct your business in full compliance with all applicable competition/antitrust and fair competition laws.
- 3.14 Never enter into formal or informal agreements with competitors, or share confidential information, in a manner that could be anti-competitive.
- 3.15 Never abuse your market position to corner a market or disrupt trade.

## Economic and Trade Sanctions

- 3.16 Comply with all applicable trade laws and sanctions, including all applicable export and import laws and regulations.

## AML, Fraud and Financial Misconduct

- 3.17 Always act with honesty and avoid any act that may constitute illegal behaviour or fraud.
- 3.18 Contact Entain without delay to discuss any knowledge or suspicion of potential or actual wrongdoing, unlawful acts, or fraudulent activity in relation to the services you provide for us; and
- 3.19 Provide us with support and information, as required, in the scope of any investigations or matters of actual or potential wrongdoing, unlawful act or fraud.

## Supply Chain Transparency

- 3.20 Check that you have received an applicable purchase order from us before submitting any valid invoice to us (in line with our "No Purchase Order (PO), No Pay" policy).

## Financial Records

- 3.21 Maintain fair and accurate accounting books and records.
- 3.22 Have appropriate internal controls that evidence the business reason for payments made or received.
- 3.23 Never conceal or misrepresent expenditure.
- 3.24 Follow applicable invoicing and taxation requirements.
- 3.25 Comply with lawful and appropriate accounting practices.

## Confidentiality and Security

- 3.26 Treat all Entain information with the highest degree of care to prevent unauthorized access, disclosure, misuse, or alteration. Only use Entain information for purposes directly related to the performance of the contract and delete once no longer needed.
- 3.27 Implement and maintain robust cybersecurity measures throughout the duration of the engagement.
- 3.28 Ensure all data is encrypted using industry standards to prevent unauthorized access.
- 3.29 Conduct regular security testing on platforms used to deliver services to Entain, and address vulnerabilities in a timely manner.
- 3.30 Implement strong authentication to enhance the security of user access to systems handling Entain information and ensure access to data is appropriate and follows the principle of least privilege.
- 3.31 Immediately notify us in the event of a data breach or security incident that could potentially impact Entain at [securityincidents@entaingroup.com](mailto:securityincidents@entaingroup.com).

## Data Protection

- 3.32 Handle personal data with the utmost respect and confidentiality.
- 3.33 Comply with the relevant privacy laws like GDPR, by conducting risk assessments and adopting the necessary technical and organizational measures to protect personal data.
- 3.34 Offer sufficient security guarantees for establishing control of Entain personal data and ensuring its integrity.
- 3.35 Not use other processors without complying with the relevant standards which may include obtaining Entain's consent.
- 3.36 Enter into a binding data processing/sharing agreement that articulates what data is involved and which security measures are in place.
- 3.37 Have policies and procedures to notify us as soon as possible ([dataprotection@entaingroup.com](mailto:dataprotection@entaingroup.com)) and without undue delay of any issues that may arise in connection with the processing of our data, including any unauthorised access or breach of confidentiality, loss, leakage, unavailability or similar concerns.

## Whistleblowing

- 3.38 Raise any actual or potential concerns or suspicions of wrongdoing related to your engagement or relationship with us, including any breaches of Entain's Employee Code of Conduct and/or our other internal policies (where known) to [whistleblowing@entaingroup.com](mailto:whistleblowing@entaingroup.com).

**Entain plc**

Incorporated in the  
Isle of Man under  
number 4685V