Entain Group Gifts, Hospitality & Donations Policy

Our policy

The principles of fair play, honesty and integrity underpin everything we do at Entain. It is our policy to never offer, give or accept gifts, hospitality, or donations that may improperly influence a business decision (or give that impression). We are a politically neutral business and do not make political donations. Charitable donations are an important part of our commitment to put back into the communities in which we operate but we will only make donations to reputable beneficiaries.

Responsibilities

We must:

- Only offer, give or accept gifts, hospitality or donations (GHD) where they serve a genuine business purpose and are appropriate, transparent and reasonable in all the circumstances.
- Register in advance where possible on the **Ethics Register**:*
    - GHD offered, given or received worth £100 or more** or equivalent in local currency (this may be a genuine estimate if you're not sure of the value and includes all elements of the GHD, including travel and accommodation on a per head basis)
    - GHD offered, given or received from a public official*** (including their partners, family members or known close associates), regardless of value.
- As managers, only approve GHD that comply with this policy.
- Unless being made by the Ladbrokes Coral Trust:
    - only offer or make charitable donations on behalf of Entain where they are approved in advance by Group Ethics.
    - carry out appropriate due diligence on the beneficiary of any donation made on behalf of Entain.
- Follow the **Group Protocol - High Value Customers/ VIP Customers** when offering gifts or hospitality to high value/VIP customers. If the Protocol is followed, these gifts and hospitality do not need to be registered on the Ethics Register.

* If it is not possible to register any GHD in advance, register it as soon as possible afterwards. Retail shop colleagues below Area Manager level or equivalent do not need to use the Ethics Register, but do need to notify their line managers. Further guidance is available **here** or from **ethics@entaingroup.com**.

**** Note: some local policies may have a lower threshold for approval.

*** A public official is anyone in any country who performs a legislative, administrative, regulatory or judicial role or employees of government-owned or controlled companies.

We must not:

- Offer, give or accept any gifts of cash or cash equivalent (such as vouchers or gift cards)*.
- Offer, give or accept any GHD:
    - which are intended to improperly influence a business decision (or could give that impression)
    - which are given to create a sense of obligation or in the expectation something will be given in return
    - worth £100 or more which has not been approved in advance by your line manager (unless advance approval was not possible)

- to a public official which has not been approved in advance by Group Ethics
- which could be construed as a bribe, seen as lavish or excessive, cause a conflict of interest or negatively affect Entain's reputation
- to or from a party who is engaged in an active tender process or commercial negotiation with Entain in which you are involved and/or could reasonably be perceived to influence the outcome
- which are regular or repetitive (i.e. to or from the same person or third party more than five times in any 12-month period)
- to public officials who are conducting regulatory inspections or site visits at any Entain premises.

- Make political donations on behalf of Entain.

* Note: Retail shop colleagues may accept small cash tips for good customer service, provided they are reasonable and proportionate, and that you notify your line manager. Further guidance is available here or from ethics@entaingroup.com.

Where can you go for help?

If you have any questions about this policy or need advice, please speak to your line manager, the People team, or you can contact the Group Ethics team at ethics@entaingroup.com. Also, you can get further advice on the ethics@entain 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 Group Ethics 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: February 2026

Version Control: 5.0

Next Review Date: February 2028

Classification: Public

Tier: 1