Entain Group Artificial Intelligence Policy (AI Policy)

Foreword

This Policy has been adopted to ensure that Artificial Intelligence (AI) is used in a manner that complies with applicable laws.

The ability to use AI is important to Entain. Its application can be through the use of commercially available Large Language Models (LLMs) and Generative AI solutions, in-house trained models and solutions or through AI functionalities offered as part of 3rd party service offerings.

Some uses of AI may present high risks to Entain and may lead to unintentional disclosure of confidential information or claims against the business in areas such as Intellectual Property (IP), Data Privacy or Information Security. To prevent and mitigate these potential risks, our use of AI must be properly assessed and recorded.

This Policy establishes the principles governing the use of AI-driven technologies at Entain and outlines how to address AI related risks. It incorporates principles of data protection laws, given the high likelihood of outcomes impacting individuals, and also sets out requirements relating to technical cyber security, emerging AI regulation (including the EU Artificial Intelligence Act), and other legal obligations arising from equality laws, duties of confidentiality and IP rights.

This Policy is supported by the Guidance Notes that further clarifies the implementation of this AI Policy and its principles; and the AI Governance Committee. More guidance can also be found in the **AI Governance hub** .

The Quick Read

➔ If you are considering developing, acquiring or using any AI system or application that includes AI functionalities, or intending to use Generative AI services, you should note that:

- You must comply with Entain policies, including this AI Policy alongside the Data Privacy and Retention Policies, Acceptable Use Policy, Information Security Policy.
- The **AI Policy Guidance Notes** will help you engage the right teams to support your needs (for example, Cyber Security, Data Governance, Data Privacy or Commercial Legal).
- More guidance is available for our colleagues on our **AI Governance hub**.

Our Policy

The principles of fairness, honesty and integrity underpin everything we do at Entain. It is our policy when using AI to:

- Promote trust for our customers, B2B clients and our employees.
- Respect individuals' rights, especially where they are subject to automated decisions.
- Protect Entain IP and minimise the risk that Entain infringes third party IP through our use of AI technologies.
- Ensure transparency in the use of AI by providing clear information on its purpose, data sources and context where relevant.
- Ensure our selected vendors meet our established standards, which are aligned to legal and ethical obligations.
- Establish fair unbiased decisions and ensure inclusion and diversity when AI models are being used and developed.
- Ensure we continuously monitor AI models for performance degradation and emerging biases, taking corrective action as needed.
- Adhere to the governance structure that oversees the implementation of this Policy.
- Comply with relevant AI and data protection laws and regulations.

- Ensure Entain's in-house AI solutions are developed with safety and security at their core and are built on the key principle of “trust”.
- Ensure consistency and standardisation across Entain.
- Consider the environmental and social impacts of AI systems’ design and deployment.

Responsibilities

Any individual or team considering using Generative AI resources, acquiring or using AI services (or suppliers that include an element of AI in the delivery of their services) or internally developed AI must be aware of the AI principles. These principles are **S**ecurity, **A**wareness, **F**airness, **E**ducation, **A**ccountability and **I**ntegrity – **SAFE AI**.

We must:

- Ensure that AI systems function in a robust, secure and safe way throughout their lifecycle and we continuously monitor, assess, and manage security risks, making sure that incidents are subject to rigorous reporting, and that internally developed AI systems undergo threat assessments. (**Security**)
- Ensure that our customers, colleagues, and business partners understand how we use AI and know how to challenge AI-based outcomes that impacts them, always providing as much transparency as is appropriate. (**Awareness**)
- Ensure non-prejudicial treatment of our customers, colleagues and business partners by exercising care in the way data is processed by AI systems, which includes using accurate and appropriate data sets to ensure equality, inclusivity and diversity, and having appropriate safeguards, such as human oversight where required. (**Fairness**)
- Ensure that our colleagues are trained in the mindful use of AI and are equipped with the necessary knowledge to make informed decisions regarding AI systems, through an intentional and consistent approach to AI literacy. (**Education**)
- Ensure that our processes relating to the deployment or development of AI systems include risk assessments, governance, documentation and audit trails by design, keeping a clear record of decision making. (**Accountability**)
- Ensure that we comply with all relevant laws, regulations, and regulatory guidance and that we do the right thing through a commitment to fair and trustworthy use of AI. (**Integrity**)
- Ensure careful handling of data inputs to Generative AI systems, recognising their inferential capabilities and the potential for indirect exposure of personal or sensitive information.

More information about these principles can be found in the **AI Policy Guidance Notes.**

We must not:

- Enter proprietary, confidential or personal data into public AI systems or applications which Entain has not approved.
- Use AI tools or services without going through Entain’s supplier due diligence and approval process. Further information is set out in the **AI Policy Guidance Notes.**
- Identify Entain or its business partners as part of the search criteria, prompt or input into any AI systems, unless it has been approved.
- Input into AI systems third-party intellectual property or content without proper permission.
- Use AI outputs in marketing or public content that do not comply with the Global IP Policy and/or any tailored guidance issued by the IP team.
- Rely on AI generated legal advice without consulting with our in-house Legal team.
- Deploy or develop AI systems without logging them in the AI Inventory.
- Enter personal data into AI systems unless the specific use case has been assessed for privacy risks by the Data Privacy team.

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 AIGovernance@entaingroup.com.

Raising your concerns

If you suspect a breach of this Policy has occurred or may occur in the future, raise it with People Team, our Legal team or you can contact AIGovernance@EntainGroup.com. If this is not possible, please use our Speak Out Policy.

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 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 Owners: Group Deputy General Counsel

Director of Cyber Security

Group Director, Data & Analytics

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