



Entain Group Economic and Trade Sanctions Policy

Our Policy

The principles of fair play, honesty and integrity underpin everything we do at Entain. Sanctions are restrictions on financial and economic activity imposed by states or international organisations like the United Nations or European Union. They prevent certain goods, services, finance and/or knowledge being supplied to specified countries, individuals or organisations. It is our policy to comply with all applicable economic and trade sanctions laws and regulations (collectively 'sanctions').

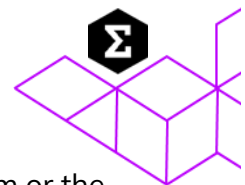
Responsibilities

We must:

- Comply with all applicable sanctions by following all internal procedures for setting up new commercial arrangements with suppliers, customers and other business partners, including supplier and customer onboarding procedures, payment processes, merger & acquisition processes and third-party screening requirements.
- If your role involves doing business with third parties (e.g. customers, suppliers, government officials and merger and acquisition activities), be familiar with potential warning signs and immediately report any concerns as follows:
 - For customers, to afc_sanctions@entaingroup.com
 - For suppliers or other third-party business partners, to ethics@entaingroup.com.
- Immediately inform afc_sanctions@entaingroup.com (for customers) or ethics@entaingroup.com (for suppliers or other third party business partners), and take no further action pending their advice:
 - Before commencing any deal or transaction involving a person, organisation or country subject to US sanctions if you are a US citizen working for Entain anywhere in the world or a non-US citizen working in the US.
 - If a sanctions screening process identifies a supplier, business partner or customer as being subject to sanctions.
 - About any changes to a supplier, business partner or customer that may impact on our compliance with any sanctions, such as a change of ownership of a company based in a sanctioned country or changes to established payment processes in relation to entities located in higher-risk countries.
- Complete all mandatory training by the completion deadline.

We must not:

- Have business dealings with any country, entity or individual we know or suspect is restricted by applicable sanctions in any way (e.g. one of their directors or sub-contractors is a sanctioned person), without prior approval of the Director, Group MLRO & Global Head of Anti Financial Crime (for customers) or Group Ethics Director (for suppliers or other third-party business partners) or the Group General Counsel.
- Knowingly participate in activities that would directly or indirectly circumvent applicable sanctions.
- Threaten or retaliate against anyone who refuses to breach any sanctions or who reports concerns that an offence has been committed.



Where can you go for help?

If you have any queries about this Policy, please speak to your line manager, the People Team or the Group Ethics team on ethics@entaingroup.com. You can also get further guidance on the [Ethics@Entain](#) page 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

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