

The logo for Entain, featuring a stylized Greek letter sigma (Σ) in a bold, purple font, followed by the word "ntain" in a white, sans-serif font.

It's your game

# Modern Slavery Strategy

2024-26

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“Our commitment to the prevention of Modern Slavery goes far beyond a legal duty.”

### A message from our CEO

“Entain’s vision is to be the world leader in sports betting, gaming, and interactive entertainment. Our purpose is to bring moments of excitement into people’s lives. Our vision and purpose are underpinned by our corporate values of do what’s right; keep it simple; go beyond; and win together.

As part of our strategy to achieve this vision, we aim to meet, and exceed, the highest standards in everything we do, from the way we run our business to the way we support our colleagues, our customers, and our communities. **We recognise that modern slavery and human trafficking in all its forms (‘Modern Slavery’) is a significant issue across the globe and within countries in which we operate.**

We are committed to acting honestly, openly and with integrity in everything

we do. A robust approach to protecting human rights and addressing Modern Slavery risks in our business and supply chains is one way we can evidence this commitment. We take our legal responsibilities extremely seriously but also recognise that **our commitment to the prevention of Modern Slavery goes far beyond a legal duty.**

This Strategy sets out what we wish to achieve by the end of 2026 and how we will achieve our goal of preventing Modern Slavery within our business and supply chains. It has been approved by the Entain Board’s Sustainability & Compliance Committee, as part of our commitment to adhering to the highest standards of corporate governance and oversight.

**Stella David**  
Chief Executive Officer  
Entain

## Where are we today?

Entain has focused over recent years on putting in place pillars that have allowed us to develop our Modern Slavery Programme and assess, address and report on Modern Slavery risks in our business and supply chains. These pillars are set out below, together with a summary of what we have achieved to date.

## The seven pillars of Entain's Modern Slavery Programme



### Governance

Our cross-functional **Modern Slavery Steering Group** was set up in 2021. It meets regularly throughout the year and its remit is to provide leadership, strategic direction, and oversight of our Programme. Overall governance and progress monitoring of our Modern Slavery work sits with the Board's Sustainability & Compliance Committee.

Modern Slavery is captured on the functional **risk registers** of the Ethics & Compliance, Procurement and People

teams (reflecting their different areas of accountability). These risk registers are regularly reviewed by the Group Risk Committee, which reports into the Board's Audit Committee (which has responsibility and accountability for risk across the whole Entain Group).

Our Modern Slavery Programme is subject to regular reviews by our Internal Audit function, with recommendations being identified and implemented.

Our **Code of Conduct** forms the backbone of our expectations for all people who work for, or with, Entain.

## Policies

Entain's **Code of Conduct** forms the backbone of our expectations for all people who work for, or with, Entain. It is a summary of the standards, policies and principles of fair play, honesty and integrity that underpin Entain and is based upon our corporate values. The Code explicitly set out Entain's commitment to making a positive contribution to human rights and to help prevent Modern Slavery in all forms and that we expect the same commitment from our employees, suppliers, and business partners.

The Code of Conduct is supported by a global **Modern Slavery & Human Rights Policy**, which sets out the obligations that all employees and others working for us must adhere to, including not using forced or compulsory labour and raising any concerns around Modern Slavery immediately for investigation.

There is also the Entain **Supplier Code of Conduct** which outlines the standards, principles, and policies that we expect from everyone who does business with us as a supplier anywhere in the world.

Other relevant policies include our Anti-Bribery & Corruption; No PO, No Pay; Procurement; Recruitment; Equality & Diversity; Bullying, Harassment and Victimisation; Speak Out and Grievance Policies. We have effective grievance mechanisms for employees to raise any Modern Slavery concerns (or other legal

or ethical concerns). In February 2023, a new **Policy Governance Framework** was launched, to ensure the right level of consistency, oversight, and accountability for all our policies.

## Third Party Risk Management

Entain requires **all new suppliers to abide by our Code of Conduct and Supplier Code of Conduct** and to have read our Modern Slavery Statement.

We screen suppliers using a third-party due diligence tool to identify intelligence around Modern Slavery and/or human rights abuses or other ethical concerns, including sanctions, bribery and corruption. We also carry out Modern Slavery due diligence as part of our standard mergers and acquisitions process.

During 2022, we completed a risk assessment, identifying suppliers who represent a higher risk from a Modern Slavery point of view, based on factors such as category of spend and jurisdiction. Modern Slavery questionnaires are sent to our highest risk suppliers. Where questionnaire responses indicate an opportunity for improved risk management, we provide suggested actions to those suppliers.

We include appropriate Modern Slavery clauses in terms and conditions with affiliates and suppliers.

## Recruitment

We require that all third parties engaged by Entain to support the hiring of new colleagues (employment agencies, temporary worker providers etc.) adhere to, at a minimum, the same standards of governance as Entain in its hiring practices. Where we use third parties,

they are subject to our supplier due diligence process (where our agreement is not directly with the individual providing the contract or freelance labour) and they are required to abide by the Supplier Code of Conduct.

We include appropriate Modern Slavery clauses in terms and conditions with recruitment agencies and recognise and comply with a number of the indices given in the [Reasonable Recruitment Toolkit](#).

We check bank accounts and IDs at the onboarding stage of all new hires to ensure that the bank account is not being used by multiple employees (which can be an indicator of Modern Slavery). We also carry out checks if a colleague wishes to change their bank account details.

We do not use, nor do we allow the use of, recruitment fees at any stage of our process and adhere to the 'Employer Pays' principle.

### Training and awareness

New joiners to Entain are required to complete a **mandatory eLearning module on Modern Slavery**, as part of their induction. Modern Slavery also forms part of our mandatory Group-wide training modules that must be completed every year. In-person training is provided annually for specific teams across Entain, where Modern Slavery is particularly relevant, such as HR,

Internal Audit, Recruitment and Procurement.

We roll out regular Modern Slavery-specific communications as part of our ongoing training and communications programme.

Payment of the Entain Group annual bonus is tied to minimum completion levels for mandatory training modules, including Modern Slavery.

### Strategic partnerships

Since 2021, Entain has partnered with Unseen, an anti-modern slavery charity, who continue to strengthen our Modern Slavery Programme.

In 2022, Entain began a partnership with EcoVadis, the world's largest platform for supplier sustainability ratings, to strengthen our supplier due diligence. The platform helps us evaluate our key suppliers and their training needs across four topics – environment, labour and human rights, ethics, and sustainable procurement.

We continually consider and evaluate potential new partnerships to support our Programme.

### Transparency and reporting

Every year, Entain publishes its annual Modern Slavery Statement, in line with the Modern Slavery Act 2015. This is a critical means to ensure we hold ourselves to account and accomplish what we have stated we will do. The Board's Sustainability & Compliance Committee also receives regularly reports on the state of the Modern Slavery Programme.

## Where do we want to get to?

We now want to build on the solid foundations we have put in place and take a more strategic approach to tackling Modern Slavery.

Recognising that the risks of Modern Slavery are constantly evolving, and that Entain's Modern Slavery Programme has been in place for several years, in 2023, we decided it was time to set out our vision of what we want to achieve with our Programme over the longer term. Consulting with key internal and external stakeholders, we reviewed the current state of our Modern Slavery Programme and identified goals and objectives we want to achieve by the end of 2026. This is part of our ongoing commitment to hold ourselves to account in addition to meeting and exceeding our legal responsibilities.

**Our vision is to address the Modern Slavery risks in our workforce and our supply chains and eradicate them to the maximum extent possible.**

This would enable all colleagues at Entain and all workers in our supply chains to live and work safely and ensure our actions as a global business do not negatively impact individuals and communities.

To achieve our vision, we have identified three priority issues based on an analysis of Entain's biggest risks and impact:

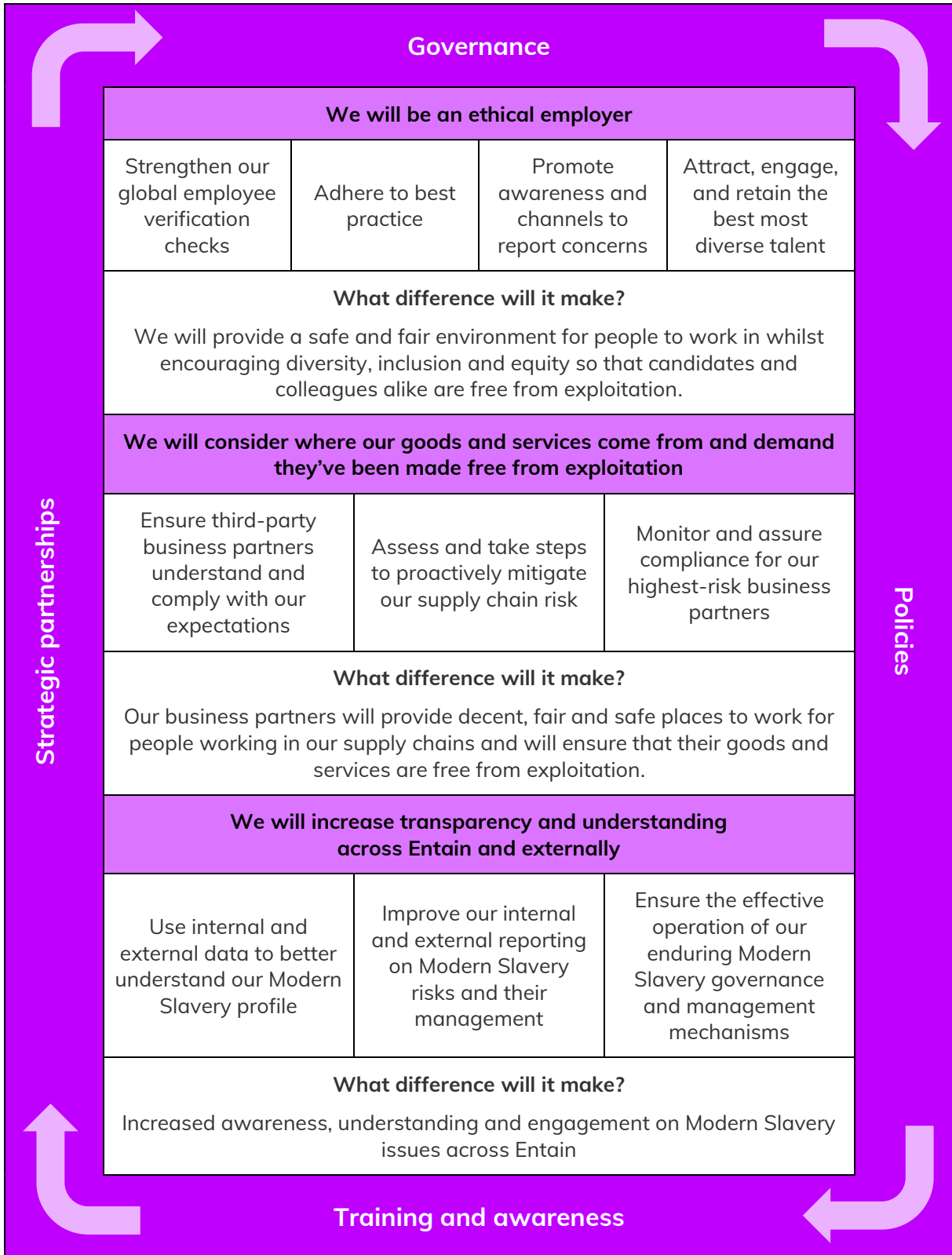
- recruitment;
- third party risk management; and
- transparency and reporting.

This Strategy aims to address these three areas of focus. The chart below outlines what we aim to achieve by focusing on these priorities. Actions underpinning these priorities are set out in more detail in the Action Plan in Appendix 1. These priorities continue to be supported by the other pillars of our Modern Slavery Programme, as set out in Appendix 2.

## Beyond 2026

The strategy will be reviewed at the end of each year, to ensure it remains the best approach to achieving our vision. During 2026, a full review will be carried out by the E&C function with support and input from key stakeholders, to consider whether we have delivered the strategy and to determine the forward plan.

## Our Modern Slavery Strategy



## How will we know that we have achieved our objectives?

The Action Plan includes detailed metrics, key performance indicators (KPIs) and targets, which we will use to monitor and evidence our progress in implementing our Strategy and the effectiveness of the Programme.

We will report annually within our Modern Slavery Statement on these metrics and measures of success. Progress will also be reported regularly to the Modern Slavery Steering Group and the Sustainability & Compliance Committee.

## What next?

Modern Slavery risks, the legal and regulatory framework in which we operate, best practice and the expectations of our wider stakeholders continually evolve, which means there are always improvements that can be made.

The Strategy will be reviewed at the end of each year and updated, if necessary, to ensure it remains the best approach to achieving our vision. At the end of the three years, a review will be carried out by the Modern Slavery Steering Group and our stakeholders, to measure whether we have achieved our vision and to agree how we continue to develop our Modern Slavery Programme going forward.

## Appendix 1

### Action Plan for our three key priorities

Priority 1: We will be an ethical employer				
Objective: To be an ethical employer, improve standards for people working at Entain and provide a decent, fair and safe place to work				
Goal	Actions required	Team responsible	Target	KPIs
We will continue to focus on strengthening our global employee verification checks, framework and methodology	Implementation of a global supplier for global background and right to work checks	People Team	Q1 2024 with a phased approach until 2025	Global supplier in place by the end of 2025
All People policies follow best practice from a Modern Slavery point of view	All recommendations completed from the gap analysis of our policies carried out by Unseen	People Team	100% recommendations completed by Q4 2024	% of recommendations completed by Q4 2024
We will ensure materials relating to human trafficking and modern slavery are available to employees on our intranet with mandatory learning to promote awareness and channels to report concerns and any alleged or actual wrongdoing	Clear indications and signposts to colleagues where materials and resources can be found	People Team	End of Q2 2024 (in line with the launch of the new policy management platform – see below)	Materials available to employees by the end of Q3 2024

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Priority 1: We will be an ethical employer				
Objective: To be an ethical employer, improve standards for people working at Entain and provide a decent, fair and safe place to work				
Goal	Actions required	Team responsible	Target	KPIs
We will continue our commitment to transforming how we attract, engage and retain the best, most diverse talent whether as permanent colleagues, contractors or temporary workers.	We will ensure the policies and processes underpinning all aspects of the hiring process remove / mitigate any risks relating to Modern Slavery, including holding partners who we work with to the same standards	People Team	2024 onwards	Successful delivery of transformation programme by the end of 2025

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Priority 2: We will consider where our products and services come from and demand they've been made free from exploitation				
Objective 1: Use our influence and leverage to improve standards for people working in our supply chains, ensure they have a decent, fair and safe place to work and tackle worker exploitation where we find it				
Goal	Actions required	Team responsible	Target	KPIs
Improve process for ensuring third-party business partners are complying with our minimum expectations at the point of onboarding	Roll out existing business partner onboarding process across the whole of the Entain Group	Procurement Team	<ul style="list-style-type: none"> <li>End of Q2 2024 – process rolled out across the whole of the Entain Group</li> </ul>	<ul style="list-style-type: none"> <li>% of Entain entities following the business partner onboarding process</li> </ul>
Improve process for ensuring third-party business partners are complying with our minimum expectations at the point of onboarding (continued)	Develop our use of external platforms to further communicate our expectations to business partners around Modern Slavery	Procurement Team	<ul style="list-style-type: none"> <li>End of 2023 – External platform used by Entain embedded within our tender process</li> <li>75% of spend with business partners are on an external platform used by Entain by the end of 2025</li> </ul>	<ul style="list-style-type: none"> <li>% and number of business partners live on Entain’s external platform who have at least one policy on modern slavery and/or human rights</li> <li>% of suppliers live on Entain’s external platform who have a corrective action plan to have at least one standard policy on labour and</li> </ul>

## Appendix 1

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Priority 2: We will consider where our products and services come from and demand they've been made free from exploitation				
Objective 1: Use our influence and leverage to improve standards for people working in our supply chains, ensure they have a decent, fair and safe place to work and tackle worker exploitation where we find it				
Goal	Actions required	Team responsible	Target	KPIs
Improve process for ensuring third-party business partners are complying with our minimum expectations at the point of onboarding (continued)	Develop our use of external platforms to further communicate our expectations to business partners around Modern Slavery (continued)	Procurement Team		<ul style="list-style-type: none"> <li>% of business partner spend assessed by Entain's external platform</li> </ul>
Communicate our latest published modern slavery statement to our high-risk third-party business partners	Develop process, identify our high-risk third-party business partners and share with them our latest modern slavery statement	Procurement Team	<ul style="list-style-type: none"> <li>End of 2024 – process developed and rolled out to 100% of our high-risk business partners</li> </ul>	<ul style="list-style-type: none"> <li>% and number of our high-risk business partners sent our latest published modern slavery statement within three months of publication on our corporate website</li> </ul>

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Objective 1: Use our influence and leverage to improve standards for people working in our supply chains, ensure they have a decent, fair and safe place to work and tackle worker exploitation where we find it				
Goal	Actions required	Team responsible	Target	KPIs
Raise third-party business partner awareness on Modern Slavery and human rights	Develop training and/or learning material to share with business partners	Procurement Team Ethics & Compliance Team People Team	<ul style="list-style-type: none"> <li>End of Q2 2024 – training and/or learning materials developed</li> <li>2024 &amp; 2025 – develop a process to identify high-risk business partners who may benefit from Modern Slavery training and then share learning materials in an appropriate format</li> </ul>	<ul style="list-style-type: none"> <li>% and number of high-risk business partners with whom we have shared learning materials</li> </ul>

## Appendix 1

### Action Plan for our three key priorities

Priority 2: We will consider where our products and services come from and demand they've been made free from exploitation				
Objective 2: To fully identify, assess and mitigate the Modern Slavery risks posed by our suppliers, considering factors such as (but not limited to) supplier location, spend category, supplier spend and country risk				
Goal	Action required	Team responsible	Target	KPIs
Conduct a third-party business partner risk assessment every two years	Business partner risk assessment carried out using an agreed risk assessment framework including (but not limited to) consideration of business partner location, spend, spend category and country risk	Procurement Team	<ul style="list-style-type: none"> <li>2024 and 2026 – activity performed and completed by the end of Q2 in 2024 and 2026</li> </ul>	<ul style="list-style-type: none"> <li>% and number of in-scope business partners that went through the risk assessment process</li> <li>% and number of business partners considered high-risk following the completion of the risk assessment</li> <li>% and number of high-risk business partners engaged via Entain's external platform</li> </ul>

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Priority 2: We will consider where our products and services come from and demand they've been made free from exploitation				
Objective 2: To fully identify, assess and mitigate the Modern Slavery risks posed by our suppliers, considering factors such as (but not limited to) supplier location, spend category, supplier spend and country risk				
Goal	Action required	Team responsible	Target	KPIs
Assist those high-risk third-party business partners identified through the risk assessment to improve their Modern Slavery risk mitigation	Develop and implement a Modern Slavery due diligence questionnaire process and associated scoring mechanism and recommended improvements	Procurement Team	<ul style="list-style-type: none"> <li>2024 and 2026 – activity performed by the end of Q2 in 2024 and 2026 for those business partners identified as high-risk with a score and recommended improvements (where appropriate) communicated post-assessment</li> </ul>	<ul style="list-style-type: none"> <li>% and number of high-risk business partners who have completed a desk-based due diligence questionnaire</li> <li>% and number of high-risk business partners that have a recommended improvement shared with them</li> <li>% of and number of business partners live on Entain's external platform who have a recommended improvement to have at least one policy on Modern Slavery and/or human rights</li> </ul>

## Appendix 1

### Action Plan for our three key priorities

Priority 2: We will consider where our products and services come from and demand they've been made free from exploitation				
Objective 2: To fully identify, assess and mitigate the Modern Slavery risks posed by our suppliers, considering factors such as (but not limited to) supplier location, spend category, supplier spend and country risk				
Goal	Action required	Team responsible	Target	KPIs
Perform on-site audits for Entain's highest risk third-party business partners	Develop and implement a periodic, risk-based on-site audit process for Entain's highest risk business partners, based on the results of the due diligence questionnaire process	Procurement Team	<ul style="list-style-type: none"> <li>End of 2025 – process developed and activity performed</li> </ul>	<ul style="list-style-type: none"> <li>% and number of high-risk business partners who have gone through an on-site audit</li> </ul>

# Appendix 1

## Action Plan for our three key priorities

Priority 3: We will increase transparency and understanding across Entain and externally				
Objective 1: To continue to work transparently and collaboratively across Entain to better identify Modern Slavery risks				
Goal	Actions required	Team responsible	Target	KPIs
Quality data is being captured, analysed and shared to enable Entain to identify trends, risks and hotspots and ensure its priorities and Modern Slavery Strategy and Programme remain targeted on the areas of highest risk	<ul style="list-style-type: none"> <li>Identify relevant data sources, including Internal Audit reports, Procurement risk assessments, training data, grievances, Speak Out reports, investigations and other sources of relevant information</li> <li>Develop a process to capture and analyse data</li> <li>Develop a heatmap/dashboard to provide a holistic view of Modern Slavery risk across Entain</li> <li>Set out reporting, escalation and remediation process for observations made from data analysis</li> </ul>	Modern Slavery Steering Group	<ul style="list-style-type: none"> <li>End of Q2 2024: relevant data sources identified and reporting process developed</li> <li>End of 2024: Data analysed and heatmap/dashboard created</li> <li>2025 onwards: regularly updating and reporting on the heatmap/dashboard</li> </ul>	<ul style="list-style-type: none"> <li>Creation of the heatmap/dashboard by the end of 2024</li> <li>Heatmap/dashboard reviewed and updated by the Modern Slavery Steering Group every six months</li> <li>Reporting at least twice a year to the Sustainability &amp; Compliance Committee on our progress with implementing the Strategy, the achievement of targets and the tracking of KPIs</li> </ul>

## Appendix 1

### Action Plan for our three key priorities

Priority 3: We will increase transparency and understanding across Entain and externally				
Objective 2: To increase transparency in our external reporting on our Modern Slavery Programme, sharing the progress we have made, the issues we have identified and the steps we have taken to remediate these issues				
Goal	Actions required	Team responsible	Target	KPIs
Enhance our Modern Slavery Statements by including more comprehensive disclosures on key risk areas	<ul style="list-style-type: none"> <li>Collate available external feedback on best practices and benchmarking in relation to Modern Slavery reporting</li> <li>Perform a gap analysis on the above, identifying areas for improvement</li> </ul>	Modern Slavery Steering Group Ethics & Compliance Team Sustainability Team Cosec Team	Increased transparency included in Modern Slavery Statements published in 2024 onwards in line with best practice	<ul style="list-style-type: none"> <li>Achievement of Tier 2 rating from CCLA in 2024 and maintenance of this tier going forwards</li> <li>Modern Slavery Statement published on the Government Registry within one month of publication on the Entain website.</li> </ul>

## Appendix 2

### Ongoing actions for the other pillars of Entain’s Modern Slavery Programme

Governance			
Objective: To continue to develop the governance around our Modern Slavery Programme so it holds the right people to account and drives continuous improvement and the completion of our Modern Slavery Strategy			
Goal	Actions required	Team responsible	Annual KPIs/targets
Modern Slavery Steering Group meets regularly to drive forward our Modern Slavery Strategy	<ul style="list-style-type: none"> <li>Meetings planned for a year in advance</li> <li>Minutes taken of every meeting</li> <li>Action tracker reviewed at all meetings</li> <li>Annual review of the Modern Slavery Strategy and Action Plan</li> <li>Modern Slavery Steering Group has a representative from each key area of the business at every meeting</li> </ul>	Chair/secretary of the Modern Slavery Steering Group	<ul style="list-style-type: none"> <li>At least four meetings per year</li> <li>Minutes are taken of every meeting</li> <li>Number of actions completed in a timely manner</li> <li>Review noted in the minutes of the Modern Slavery Steering Group plus any updates made to the Modern Slavery Strategy or Action Plan</li> <li>100% of meetings have a representative (or delegate) from each key area of the business</li> </ul>

## Appendix 2

### Ongoing actions for the other pillars of Entain's Modern Slavery Programme

Governance (continued)			
Objective: To continue to develop the governance around our Modern Slavery Programme so it holds the right people to account and drives continuous improvement and the completion of our Modern Slavery Strategy			
Goal	Actions required	Team responsible	Annual KPIs/targets
Identify key Modern Slavery risks across the Entain Group	<ul style="list-style-type: none"> <li>Risk registers kept up to date and mitigating actions are progressed</li> <li>Modern Slavery risk to be reviewed at least annually by the highest level of corporate risk committees i.e. Group Risk Committee and Sustainability &amp; Compliance Committee</li> </ul>	Modern Slavery Steering Group Risk Team	<ul style="list-style-type: none"> <li>100% of Modern Slavery risk registers kept up to date</li> <li>Number of mitigating actions identified in risk registers completed</li> <li>Modern Slavery risk reviewed by the Group Risk Committee and Sustainability &amp; Compliance Committee</li> </ul>
Track relevant evolving legislative and regulatory requirements in relation to Modern Slavery around the world	<ul style="list-style-type: none"> <li>Develop formal regulatory requirements framework by key territory to cross-check policies and disclosures</li> <li>Track legislative and regulatory developments and report to the Modern Slavery Steering Group</li> </ul>	Ethics & Compliance Team Sustainability Team	<ul style="list-style-type: none"> <li>Framework developed and reviewed by the Modern Slavery Steering Group by the end of 2024</li> <li>Legislative and regulatory update provided to the Modern Slavery Steering Group at least once a year (following initial review of the framework)</li> </ul>

## Appendix 2

### Ongoing actions for the other pillars of Entain's Modern Slavery Programme

Policies			
Objective: To ensure our policies are up to date, fit for purpose and follow our Policy Governance Framework			
Goal	Actions required	Team responsible	Annual KPIs/targets
All relevant policies are reviewed and updated if appropriate at least once every calendar year	Policy owners to review their policies in a timely manner	Policy Owners	<ul style="list-style-type: none"> <li>100% of relevant policies have been reviewed at least once every calendar year</li> </ul>
All policies relevant to Modern Slavery go through the Policy Governance Framework when they are reviewed and updated	Policy owners to follow the Policy Governance Framework	Policy Owners	<ul style="list-style-type: none"> <li>100% of relevant policies have been through the Policy Governance Framework</li> </ul>
Policies are easily accessible by all colleagues across Entain	Implement a policy management platform	People Team	<ul style="list-style-type: none"> <li>New policy management platform available to Entain colleagues by the end of Q2 2024</li> </ul>

## Appendix 2

### Ongoing actions for the other pillars of Entain's Modern Slavery Programme

Strategic partnerships			
Objective: To identify and work with appropriate external partners who can challenge, drive and support us in delivering our Modern Slavery Strategy and Programme			
Goal	Actions required	Team responsible	Annual KPIs/targets
Identify and assess potential new partners to support us in developing and implementing our Modern Slavery Strategy and Programme	Identify potential opportunities for further external partnerships, including UN Global Compact membership and signing the Anti-Slavery Charter	Modern Slavery Steering Group Sustainability Team	<ul style="list-style-type: none"> <li>• Number of strategic partnerships in place</li> <li>• Number of improvements/additions made to the Modern Slavery Strategy and Programme due to the input of external partners</li> </ul>
Identify and assess opportunities to support potential victims of modern slavery.	Identify and assess charities and other relevant organisations to collaborate in supporting victims of modern slavery and associated risks.	Legal Team	<ul style="list-style-type: none"> <li>• Number of opportunities identified, assessed, and taken forward</li> </ul>

## Appendix 2

### Ongoing actions for the other pillars of Entain's Modern Slavery Programme

Training and awareness			
Objective: To ensure all Entain colleagues are aware that Modern Slavery is happening, know the signs to look out for and how to respond to concerns			
Goal	Actions required	Team responsible	Annual KPIs/targets
All Entain colleagues to receive regular training on Modern Slavery including newly acquired entities	<ul style="list-style-type: none"> <li>Modern Slavery to be included in the mandatory eLearning training programme</li> <li>New joiners to be assigned the Modern Slavery module</li> <li>Annual review to identify teams that need enhanced tailored training</li> <li>Develop and deliver (either internally or using external trainers) targeted tailored training to identified teams</li> </ul>	Ethics & Compliance Team	<ul style="list-style-type: none"> <li>2024: 85% completion by completion deadline</li> <li>2025: 90% completion by completion deadline</li> <li>2026: 95% completion by completion deadline</li> <li>95% completion of the Modern Slavery module by new joiners</li> <li>Number of Entain colleagues completing the mandatory training</li> <li>Percentage of newly acquired entities and number of colleagues at these entities receiving Modern Slavery training within six months of acquisition</li> </ul>

## Appendix 2

### Ongoing actions for the other pillars of Entain’s Modern Slavery Programme

Training and awareness (continued)			
Objective: To ensure all Entain colleagues are aware that Modern Slavery is happening, know the signs to look out for and how to respond to concerns			
Goal	Actions required	Team responsible	Annual KPIs/targets
All Entain colleagues to receive regular training on Modern Slavery including newly acquired entities (continued)		Ethics & Compliance Team	<ul style="list-style-type: none"> <li>100% of teams identified in the annual review to receive training at least once every two years</li> <li>Number of Entain colleagues in identified teams attending the enhanced training</li> </ul>
Entain colleagues to receive regular communications on Modern Slavery	<ul style="list-style-type: none"> <li>Develop an annual Modern Slavery communication plan</li> <li>Develop a specific UK Retail communication plan</li> <li>2024: Ethics day to include Modern Slavery</li> <li>2025: Ethics Week to include Modern Slavery</li> </ul>	Internal Communications Team & Retail Communications Team Ethics & Compliance Team	<ul style="list-style-type: none"> <li>At least three communications related to Modern Slavery issued every year, including one on the publication of the Entain Modern Slavery Statement and one on Anti-Slavery Day</li> <li>Number of events where Modern Slavery is mentioned</li> <li>2024: Successful delivery of Ethics Day</li> <li>2025: Successful delivery of Ethics Week</li> </ul>

