

Entain Group Artificial Intelligence Policy

Foreword

This AI Policy is led by Entain's AI & Data Ethics Charter which has been adopted to ensure that any automated or partially automated processing using Artificial Intelligence (AI) are used in a manner that complies with local AI laws and our Charter.

The ability to use AI in the business is important to Entain. Its application can be through direct use – such as “Generative AI” applications like ChatGPT or CoPilot - can be an element of the functionality offered as part of a 3rd party supplier services or can be a service developed internally.

Some use of AI represent a high risk to Entain and may lead to claims against the business in areas such as Intellectual Property, Data Protection or Information Security. To combat these potential risks, our use of AI must be properly assessed and recorded.

This Policy establishes Principles for the use of AI driven technologies at Entain and for addressing the relevant AI associated risks. Whilst it includes the Principles of Privacy laws due to the high likelihood of outcomes impacting individuals, it also encompasses requirements for technical security, newly emerging AI Legislation and other legal obligations, such as Equality laws, duties of confidentiality and Intellectual Property (IP).

The Policy is supported through an AI Governance Framework which includes an AI Governance Board and defined Controls that must be adopted by business Teams using AI.

A Glossary is provided in the AI Policy Guidance which helps explain some of the language of AI such as “Generative AI”.

The Quick Read

- ➔ If you are considering developing or acquiring any application that includes AI functionality, or intending to sign up to “Generative AI” services, you should note that:
- The AI Policy Guidance will help you engage the right teams to support your needs (teams such as Technical Compliance, Privacy or our Legal team).
 - The Policy Principles set out below are supported by a Governance Framework of controls, and you should be prepared to comply with these
 - This can be a complex area and support and guidance is available through the Guidance and via the contact details provided in this Policy.

Our Policy

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

- Promote the trust of our Customers, our B2B Clients and our Employees in the use of AI;
- Respect individuals' rights where they are subject to automated decisions;
- Protect Entain IP and minimise the risk that Entain infringes third party Intellectual Property via our use of AI technologies;
- Ensure applications are used in a transparent manner;
- 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;



- Establish an AI Governance Committee with an approved framework with accountability apportioned within Entain;
- Comply with relevant AI and data protection legislation and regulations;
- Ensure Entain's in-house AI solutions are developed with safety and security at their core to protect and to build on the key principle of “trust” with our customers; and
- Ensure consistency and standardisation across Entain.

To achieve these key Policy objectives, the following principles, which are aligned to our AI & Data Ethics Charter, have been adopted and are covered in more detail in the AI Policy Guidance.

Policy Principles in Practice

Any individual or team considering using Generative AI resources or acquiring AI services (or services that include an element of AI in the delivery of that service) or internally developed AI must be aware of the Principles, highlighted below.

Responsibilities

Our AI Principle are highlighted in bold below.

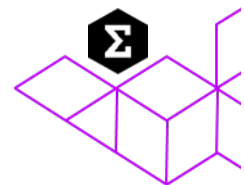
We must:

- Be prepared to be held **Accountable** for the AI outcomes or the development of AI driven applications.
- Be prepared to build **Human Review, and Auditability** into the AI process
- Ensure that the use of AI and decisions being taken are **Lawful**
- Be able to evidence that AI outcomes support **Fairness, Equality, Inclusivity and Diversity**
- Be **Transparent** about the use of AI, particularly letting colleagues know where anything has been AI generated and able to **Explain** how AI works or impacts individuals or our business.
- Apply **Data Minimisation, Data Accuracy and Storage Limitation** rules – AI outcomes are not always correct, can involve large volumes of data which need to be managed in line with our Retention Policy.
- Apply **Security, Technical Robustness and Safety** in deployment.
- Only use AI to in a manner that helps engender **Trust** in our business, our people and the AI outcomes.

To support these Principles, all proposed roll-out of that include the use of AI functionality must go through an initial assessment to understand the legal and compliance requirements for that case. More information about this assessment can be found in the AI Policy Guidance.

We must not:

- Enter any proprietary information, any confidential information or any personal data into “Generative AI” applications such as ChatGPT - read the AI providers Terms and Conditions first and refer to the guidance from Technical Compliance Entain and ChatGPT (AI) (sharepoint.com).
- Register for or use any free “Generative AI” applications or use paid services without first ensuring the AI providers have been through our procurement and due diligence process. This will come into effect with this Policy (further information is set out in the AI Policy Guidance linked to this Policy on action if you already have an Entain registered account).
- Use “Generative AI” applications for developing Advertising material.
- Identify Entain or its business partners as part of the search criteria or as part of information input into any “Generative AI” application.
- Develop any Entain controls or Governance Frameworks for AI independently without first gaining approval from the AI Governance Committee.



- Input IP/content belonging to someone else without their permission.

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 the Privacy Team on dataprivacyassurance@entaingroup.com.

You can also get further information from the AI Policy Guidance attached to this Policy.

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 the Privacy Team on dataprivacyassurance@entaingroup.com (at the above email address) 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 who individually or as a team is considering using Generative AI resources or acquiring services that include AI in the functionality or is developing AI capabilities internally.

We take breaches of our policies seriously. Failure to comply with this policy may result in disciplinary action.

Policy Owner: Chief Data Privacy Officer

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Classification: Public

Tier: 1