Entain Group Competing Fairly Policy

Our Policy

The principles of fair play, honesty and integrity underpin everything we do at Entain. It is our policy to compete openly and fairly in compliance with all applicable competition/antitrust laws. We do not engage in practices that restrict fair market competition.

Responsibilities

We must:

- Always develop our commercial strategies independently of our competitors.
- Treat all our customers and suppliers fairly.
- Seek legal advice when:
    - considering a merger, acquisition, joint venture or similar transaction
    - entering into any agreement or arrangement with a competitor
    - entering into contracts with suppliers or other third parties in accordance with the contracting process set out in the Group Commercial Legal Team hub on **Entain.me**.
- Immediately report to **ethics@entaingroup.com** or the Group Legal Team **legalsupport@entaingroup.com** if you receive any commercially sensitive information belonging to a competitor of Entain (or any of its affiliates) or are asked to share, exchange or discuss this type of information with a competitor.
- Contact **ethics@entaingroup.com** if you are contacted by a competition/antitrust authority.

We must not:

- Engage in any practices that restrict free market competition.
- Unless agreed in advance by the Group Legal Team or Group Ethics Team, directly or indirectly via a third party (such as a trade association):
    - share, exchange or discuss any commercially sensitive information (such as customer details, pricing, costs, volumes or strategy) with a competitor
    - receive or accept any commercially sensitive information about a competitor.
- Collude with competitors of Entain or of any of its affiliates directly or through a trade association (for example by agreeing to fix prices, returns or odds, allocate customers or markets or collectively boycott customers or suppliers) at a national or local level.
- Where an Entain entity may be considered to have market power (e.g. due to having a large market share), adopt any business practice which may take unfair advantage of customers (e.g. by charging excessive prices) or make it harder for competitors to compete on that market (e.g. by pricing below cost).
- Threaten or retaliate against anyone who refuses to take part in any anti-competitive conduct or who reports any 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 you can contact the Group Ethics Team (**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 Group 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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