

Entain Group Anti-Bribery & Corruption Policy

Foreword

At Entain, we aim to meet the highest standards in everything we do, acting ethically, openly, with integrity, and in compliance with the laws and regulations of the jurisdictions in which we operate.

We have a zero-tolerance approach to any form of bribery or corruption, and we expect the same from our business partners. This Policy sets out the principles that govern how Entain conducts its business from an anti-bribery and corruption perspective, and what we expect from everyone who works for us or does business with us.

Stella David, CEO

Our policy

The principles of fair play, honesty and integrity underpin everything we do at Entain. It is our policy to never accept, offer or give directly or indirectly any form of bribe or engage in any corrupt practices. Entain has a zero-tolerance policy for bribery and corruption, in whatever form, anywhere in the world.

This Policy should be read in conjunction with the [Gifts, Hospitality and Donations Policy](#) and the [Conflicts of Interest Policy](#).

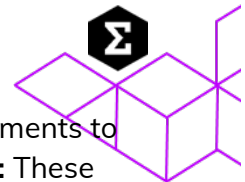
Responsibilities

We must:

- Only offer, give, or receive gifts, hospitality, or donations when they serve genuine business purposes and in accordance with the [Gifts, Hospitality and Donations Policy](#).
- Keep accurate financial records and have appropriate internal controls that evidence the business reason for payments made or received.
- Disclose any conflicts of interest in accordance with the [Conflicts of Interest Policy](#).
- Follow all internal procedures for setting up new commercial arrangements with suppliers, customers, affiliates and other business partners, including supplier onboarding procedures, payment processes and third-party screening requirements.
- If your role involves doing business with third parties (e.g. suppliers, government officials and merger and acquisition activities), be familiar with potential warning signs (see our guidance on [third party warning signs](#)) and immediately report any concerns to ethics@entaingroup.com.
- Follow the [Public Official Engagement Protocol](#) and register engagements with Public Officials on the [Ethics Register](#) where required.
- Complete all mandatory training by the completion deadline.

We must not:

- Offer, promise, give, request, agree to receive or accept anything of value to any person or third party, directly or indirectly (e.g. through a third party) in order to:
 - encourage or reward improper conduct
 - improperly obtain or retain business or
 - secure any other improper advantage in the conduct of business.
- Offer, promise, or give, directly or indirectly, anything of value to a public official or to any other person at the request of a public official (e.g. a public official's associates or family members), which is intended to influence, obtain, or retain an improper advantage in the conduct of business.



- Offer, promise, or give, directly or indirectly, any facilitation payments (small cash payments to public officials to encourage or speed-up the performance of a routine function). **Note:** These prohibitions do not apply if you need to make a payment in order to avoid an imminent threat to your or a colleague's safety. In such circumstances, contact Group Ethics as soon as possible after any such payment.
- Conceal or misrepresent expenditure.
- Threaten or retaliate against anyone who refuses to take part in improper conduct or who reports any concerns that such conduct may have been occurred.

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 Group Ethics on ethics@entaingroup.com. You can also get further guidance on the [Ethics@Entain](#) pages on Entain.Me.

Raising your concerns

If you suspect a breach of this Policy has occurred or may occur in the future (including potential breaches by third parties acting on our behalf), raise it with your line manager, the People team or the Group Ethics 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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