



It's your game

Modern Slavery and Human Trafficking Transparency Statement for Financial Year 2024



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Introduction from Entain's CEO

“At Entain, we are deeply committed to the prevention of Modern Slavery, recognising that this commitment extends far beyond legal obligations.”

As of one the leading organisations in the sports betting and gaming sector, we operate in regulated and regulating online and retail markets globally. Our purpose is to deliver the most entertaining customer experience supported by market leading player protection. This is underpinned by our corporate values: doing what's right; keeping it simple; going beyond; and winning together.

More than ever, customers expect companies to operate in an ethical way. Our customers, and society at large, have high expectations from us. We strive to meet and exceed the highest standards in all aspects of our business, from supporting our colleagues, customers, and communities to running our operations ethically. Modern Slavery is a significant global issue, and we are committed to addressing it with honesty, transparency, and integrity.

We continue to uphold our obligations for human rights issues and are working with colleagues, supply chains and relevant partners to ensure we continue to identify risk, carry out appropriate due diligence and take any necessary actions. This statement outlines our efforts in 2024 and details how we will continue to enhance our approach to managing Modern Slavery risks.

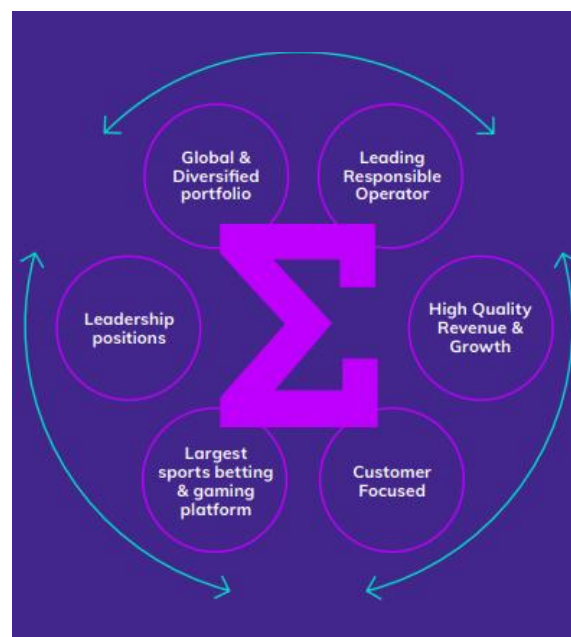


Stella David
Chief Executive Officer



Summary of our key achievements in 2024

- Progressing our 2024-26 Modern Slavery Strategy, and associated key performance indicators (KPIs)
- Further embedding our use of EcoVadis as part of our supply chain sustainability programme, with 46% of our in-scope third-party spend enrolled on the platform in 2024
- Completing a third-party supplier risk assessment to identify higher risk business partners from a Modern Slavery point of view
- Implementing a new global Applicant Tracking System, featuring enhanced monitoring capability to identify signs of potential modern slavery issues within our recruitment processes
- A 98.9% completion rate of our mandatory Code of Conduct training (which includes coverage of Modern Slavery)



The Group owns a comprehensive portfolio of over 35 leading brands across its markets. These include: BetMGM, bwin, Coral, Crystalbet, Eurobet, Ladbrokes and Sportingbet. Entain's games brands include: CasinoClub, Foxy Bingo, Gala, Gioco Digitale, partypoker and PartyCasino. The Group owns proprietary technology across all our core product verticals (such as poker, bingo, casino, and sports betting). We also provide services to third-party customers on a business-to-business (B2B) basis, such as licensing technology.

An overview of our business and structure

At Entain, doing what's right is fundamental to our approach to business. We pride ourselves on being a responsible company that our employees are proud of, and our customers, partners and suppliers trust. We believe that long-term, successful business relationships are built by being honest, open and fair.

Entain plc is one of the world's largest sports-betting and gaming groups, operating exclusively in regulated and regulating online and retail betting and gaming markets. Listed on the FTSE 100 Index, the Group has a global presence with operations in over 30 markets. We employ a workforce of around 30,000 colleagues across Europe, the Americas and APAC.

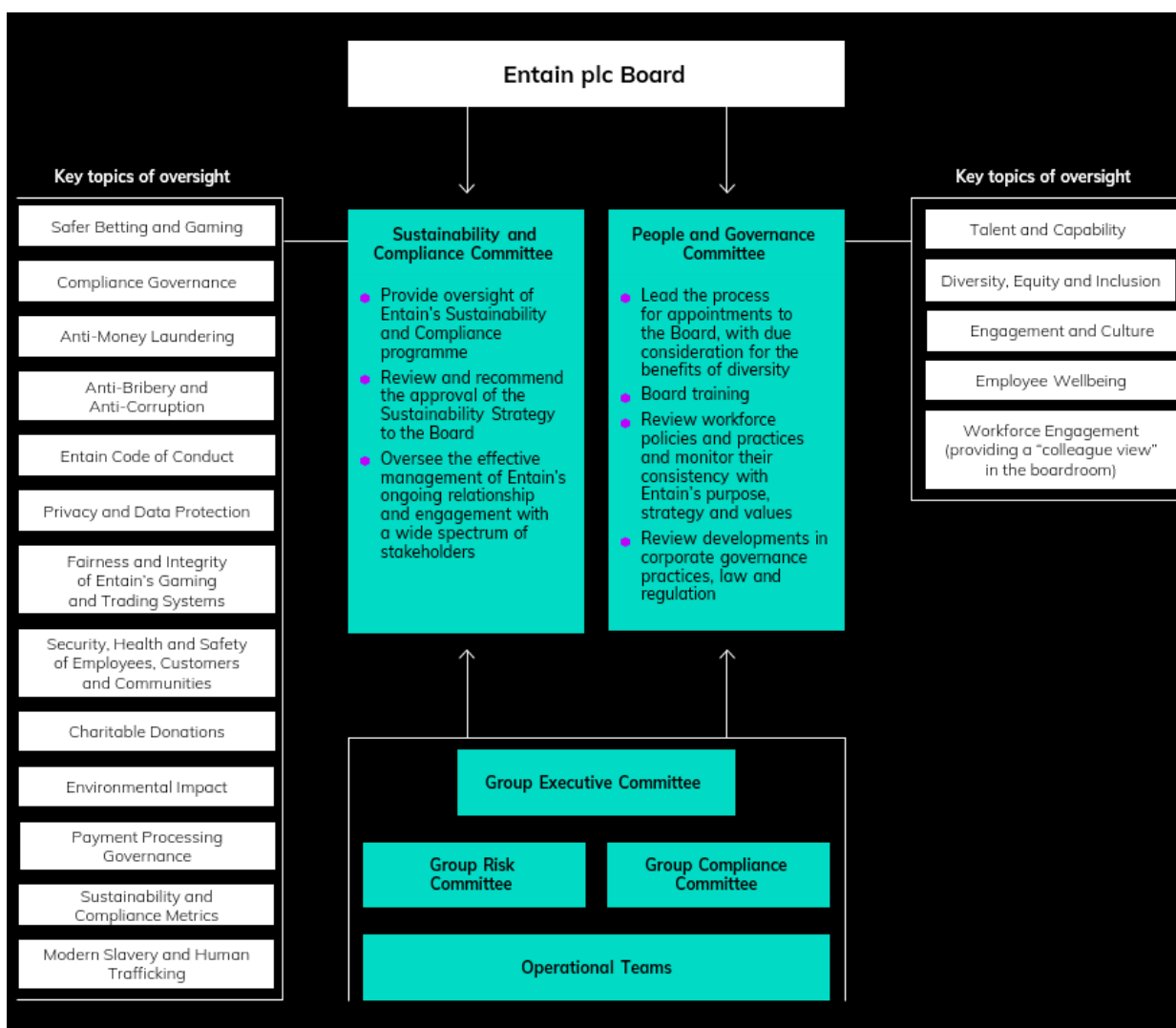


Governance

Our dedicated Governance function comprises extensive legal, risk and compliance expertise led by the Group's General Counsel. This function effectively manages the increasing scale, complexity and expectations of the Group and its stakeholders. Overall governance and oversight of our Modern Slavery programme is via the Group Risk Committee and sits with the Board's Sustainability & Compliance Committee, which met five times during 2024.

Our governance structure which covers Modern Slavery and human rights, as well as other significant risk areas, is set out below.

During 2024, the cross-functional Modern Slavery Steering Group (formed in 2021) comprised senior leaders from across the business, including the Group General Counsel and the Group Ethics Director. The Steering Group provides leadership and oversight of Modern Slavery related matters, including risk management across the supply chain. The Steering Group meets four times a year, with a broader set of stakeholders meeting in the months in between, as governed by a formal Terms of Reference.



Collaboration on Modern Slavery

During 2024, we partnered with GoodCorporation, a leading consultancy in the field of business ethics, compliance and corporate sustainability. GoodCorporation has its own database of human rights risks by country which takes into account risk factors such as governance, transparency and environmental protection, and indicators in relation to labour rights, child labour, modern slavery and workplace equality.



GoodCorporation's framework on human rights is based on emerging international best practice and is developed with reference to the UN Guiding Principles on Business and Human Rights, the UN Guiding Principles Reporting Framework, the UK Modern Slavery Act and the International Labour Organisation Declaration of Fundamental Principles and Rights at Work.

Throughout 2024, our Procurement team engaged with GoodCorporation as an external adviser to conduct a thorough, and independent supply chain Modern Slavery risk assessment using various internal and external indicators. This activity has further built upon the first supply chain risk assessment conducted in 2022 by the anti-modern slavery charity Unseen, and improves our knowledge on the subject matter. The collaboration between Entain and GoodCorporation for the risk assessment included objective and expectation settings, collection of materials, interviews, risk analysis, workshops with relevant stakeholders and recommendations. Further details can be found below within this statement.

Modern Slavery Strategy

During 2023, we developed Entain's first Modern Slavery Strategy for 2024-26, which can be accessed [here](#).

The Strategy was developed by our Modern Slavery Steering Group and approved by the Sustainability and Compliance Committee, communicated internally, and made publicly available on our website in December 2023.

The Strategy focuses on three key priorities on how we will:

1. be an ethical employer so that colleagues are free from exploitation;
2. demand our goods and services are made free from exploitation; and
3. increase transparency and understanding across Entain and externally.

It sets out where we are today, where we want to get to, and how we plan to get there. Key progress updates on the targets outlined within our strategy are as below.



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

We will continue to focus on strengthening our global employee verification checks, framework and methodology by implementing a global process for background and right to work checks. Due: Q1 2024 with a phased approach until 2025.

Status update: Territories currently covered: UK, GIB, India, Ireland, US, Austria, Bulgaria & Philippines. The next phase to implement this action will go live during 2025, with a view to provide 100% coverage by end 2025.

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 due by the end of Q3 2024.

Status update: Completed 100%

Priority 2: We will consider where our products and services come from and demand they have 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

We will improve processes for ensuring third-party business partners are complying with our minimum expectations at the point of onboarding.

Status update: To achieve this, work is underway to roll-out a new third-party risk management programme.

We will develop our use of external platforms to further communicate our expectations to business partners around Modern Slavery by embedding an external platform within our tender process and having at least 75% of spend with suppliers who are on the external platform by end 2025.

Status update: EcoVadis, a leading platform for supplier sustainability ratings has been implemented within our tender process. FY24 - 46% of spend with in-scope business partners is on EcoVadis, which is a further improvement on FY23 (circa 35%).

We will communicate our latest published Modern slavery Statement to our high risk third-party business partners and continue to raise awareness of Modern Slavery and human rights to our third-party business partners by developing processes to identify high risk suppliers and sharing training/learning materials.

Status update: After identifying eight very high risk suppliers (based off the supply chain risk assessment discussed above) we sent them the Statement and shared training materials. This equates to 0.3% of the suppliers who went through the risk assessment.

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

We will conduct a third-party risk assessment every two years using an agreed risk assessment framework during 2024 and in 2026.

Status update: This was completed in Q2 2024 via GoodCorporation. This process identified 19 suppliers as very high risk, including subsidiaries of global groups. Through further detailed review, we found that eight of these very high risk suppliers were standalone, locally based entities, which we prioritised for further assessment using a desk-based questionnaire. They were deemed very high risk primarily due to geographical location and type of good/service provided.

Priority 3: We will increase transparency and understanding across Entain and externally

Objective: 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

We will enhance our Modern Slavery statements by including more comprehensive disclosures on key risk areas by ensuring we capture best practice approaches in relation to reporting.

Status update: CCLA [Tier 2 achieved for statement covering financial year 2023](#). Statement covering financial year 2024 to be published by 31 July 2025.

Policies

As part of our system of internal controls, we maintain a hierarchy of policies and procedures to define mandatory requirements to mitigate specific risks. Policies are supported by more detailed guidance documents to help with interpretation and implementation.

Our policies are maintained on our People Hub, and facilitates regular policy review and effective policy governance. Several of our Tier 1 (Group-wide) policies are available in multiple languages to cover Entain's global presence. Selected key Tier 1 policies are made publicly available [here](#). Some Tier 1 policies are supported by Tier 2 policies, which are specific to a jurisdiction or function (e.g. if there are specific employment laws in a particular country). Given the changing global legislative landscape around Modern Slavery and employment rights, policies are reviewed regularly or when there is a change in legislation, requiring an update to be made.

The policies most relevant to Modern Slavery and human rights are summarised below.

Policy	Summary	Last reviewed	Publicly available
Code of Conduct	<ul style="list-style-type: none"> Establishes our expectations for all employees and business partners who work for, or with, Entain. Available in 12 languages. Includes a section on Modern Slavery and human rights and explicitly sets out Entain's commitment to preventing these risks from occurring in our business and supply chains. 	September 2024	Yes
Human Rights & Modern Slavery Policy	<ul style="list-style-type: none"> Sets out our commitment to human rights and to preventing Modern Slavery, including our recognition and support of: <ul style="list-style-type: none"> the International Bill of Human Rights; the core labour standards as detailed in the International Labour Organisation's human rights conventions; the UN Guiding Principles on Business and Human Rights; the human rights chapter of the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises; and the Ethical Trade Initiative's Base Code. Supported by extensive guidance on Modern Slavery warning signs and how to raise concerns. 	March 2025	Yes
Anti-bribery & Corruption Policy	<ul style="list-style-type: none"> Sets out our zero-tolerance approach to bribery and the requirements to be followed to reduce the risk of bribery and corruption across our business and supply chains. Bribery and corruption are often closely associated with other illegal activities, including Modern Slavery. 	February 2025	Yes
Anti-facilitation of Tax Evasion Policy	<ul style="list-style-type: none"> Sets out our zero-tolerance approach to tax evasion. To reduce the risk of tax evasion across our business and supply chains 	January 2025	Yes
Procurement Policy	<ul style="list-style-type: none"> Ensures minimum standards for procurement activities are applied across the Group and specifies that appropriate supplier due diligence and risk management is performed. 	April 2025	No

Policy	Summary	Last reviewed	Publicly available
	<ul style="list-style-type: none"> Requires all suppliers to comply with and adhere to all applicable international labour laws in accordance with the principles of the International Labour Organisation, UN Global Impact and the UN Declaration of Human Rights. 		
No Purchase Order, No Pay Policy	<ul style="list-style-type: none"> Ensures all suppliers are subject to due diligence to identify, assess and mitigate risks, including Modern Slavery. 	April 2025	No
Supplier Code of Conduct	<ul style="list-style-type: none"> Sets out the social, ethical, and environmental standards that Entain expects from all our suppliers, aligned to the UN Sustainable Development Goals. New suppliers must agree to adhere to the Code's principles, including compliance with all applicable human rights and employment laws. 	April 2025	Yes
Speak Out Policy (whistleblowing)	<ul style="list-style-type: none"> Facilitates and encourages people to speak out about any behaviour that might be illegal, unethical or that breaches our Code of Conduct. 	December 2024	Yes
Global Investigations Policy	<ul style="list-style-type: none"> The Global Investigations Policy governs the handling of reported concerns and ensures that investigations are objective and conducted in a consistent manner and in accordance with the highest standards of integrity, impartiality, accuracy, and fairness, in line always with our legal and regulatory obligations. 	August 2023	No
Grievance Policy	<ul style="list-style-type: none"> Colleagues can use their local grievance procedure if they feel there are work-related issues they wish to raise, which may include issues around working conditions. Matters are investigated and addressed as appropriate, in line with best practice and policy. 	October 2024	No
Group Resourcing Policy	<ul style="list-style-type: none"> Sets out the responsibilities for responsible resourcing ensuring compliance within all countries in which Entain operates 	August 2024	No

Communicating and embedding Entain Policies

Communicating our Code of Conduct and other key policies to new joiners forms part of our onboarding programme.

The Code of Conduct and key policies are also supported by a robust and effective training programme (see below). As part of this mandatory training, in 2024 employees had to confirm that they will follow the principles set out in our Code of Conduct.

New and updated policies, such as the Procurement Policy and the Anti-Bribery & Corruption Policy, are supported by Group-wide communications across a variety of channels, including targeted communications

to senior leaders, the intranet, Viva Engage communities, and email, to raise awareness. An Ethics Champions League was launched in December 2024, made up of representatives from across the Group. These Champions are used to disseminate ethics and compliance messages, including new or updated policies, at the local level.

Breaches of the Code of Conduct and Policies

Entain takes breaches of our Code of Conduct, policies, and procedures very seriously and investigates allegations as appropriate. Substantiated allegations are followed up as appropriate and may result in disciplinary action up to dismissal.

Where our suppliers or business partners are alleged to have breached our Supplier Code of Conduct or associated contractual obligations, those allegations will be investigated to determine the appropriate course of action. We will always try to resolve issues related to Modern Slavery collaboratively in the first instance, but where this is not possible, contracts may be terminated and business activity with those third parties ceased. No reports of alleged breach of the Supplier Code of Conduct around Modern Slavery were received during 2024.

We recognise that suppliers who have failed to meet our required standards relating to Modern Slavery will often have done so by mistake, so we make every effort to work with them to resolve issues and ensure a safe environment for suppliers and their workers to speak up about any concerns.

Speak Out (whistleblowing)

Our Speak Out Policy specifically lists Modern Slavery issues as examples of what can be reported under the policy. It confirms that reports can be made by or in relation to third-party suppliers.

Concerns can be raised to a line manager or the People Team, Entain's secure, confidential whistleblowing mailbox or our independent Speak Out hotline (which is also available to suppliers and is included in the Supplier Code of Conduct).

Reports can be made anonymously (where local law permits anonymous reports) using local phone numbers for all Entain's major locations or online via a reporting portal. This service is available 24 hours a day, seven days a week in 18 different languages.

All reports of misconduct or potential misconduct raised through our Speak Out channels are referred to the Chair of the Audit Committee, which has delegated the conduct of investigations to Internal Audit on its behalf.

Reporters are kept informed of the progress of investigations and will usually be told the outcome. These outcomes are also communicated to the Audit Committee and relevant Board Directors, to ensure sufficient oversight of the process.

In 2024, 125 Speak Out reports in total were received and investigated (compared to 65 in 2023). Any reports received relating to Modern Slavery would be investigated internally and reported externally to the appropriate authorities.

Other best practices

We also have multiple Employee Forums across a number of our locations. Employee Forums provide a platform for a two-way dialogue between colleagues and leadership, covering a range of topics. In addition to these Forums, employee listening and feedback sessions are held on an ad-hoc basis to facilitate the discussion of specific topics that may not otherwise be covered by Employee Forums, providing another channel in which colleagues can escalate issues or raise concerns.

A Global Engagement Conference is held annually across Entain, with representatives from the majority of its locations and members of the Board. It enables meaningful dialogue regarding the company and its ways of working, that may impact our organisation. We consider our worker wellbeing programme as vitally important to create a safe and secure environment for all our colleagues.

Ethical Trade Initiative

Entain recognises and adheres to (through incorporation into relevant Group policies and procedures) the Ethical Trade Initiative's [Base Code](#), which sets out the following principles:

1. employment is freely chosen;
2. freedom of association and the right to collective bargaining are respected;
3. working conditions are safe and hygienic;
4. child labour shall not be used;
5. living wages are paid;
6. working hours are not excessive;
7. no discrimination is practised;
8. regular employment is provided; and
9. no harsh or inhumane treatment is allowed.

Risk assessment and management

Human rights and Modern Slavery risk assessment and management are incorporated within the existing Group enterprise risk management processes. Modern Slavery risks are recorded and assessed on the Ethics, Procurement, and People Services functional risk dashboard and associated risk registers and undergo a risk review by the Group Risk Committee as part of the Group Principal Risk, 'Laws, Regulations and Compliance'. This results in the risk and associated control effectiveness being considered from different perspectives and subject to regular (at least annual) review by the Group Risk Committee. Controls for each of the above teams are also reviewed periodically by the Modern Slavery Steering Group, to provide another layer of challenge.

The Group Risk Committee reports to the Audit and Risk Committee, Sustainability & Compliance Committee and the People & Governance Committee. The Group Risk Committee meets four times per annum, and its membership includes the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer and the Group General Counsel.

The Modern Slavery Steering Committee reviews internal audit actions relating to the Modern Slavery programme. During 2024, Internal Audit demonstrated a risk and control assessment so that steering group representatives could then share Modern Slavery risk and control assessments relevant to their areas.

We have identified the two main areas of risk in our business as being: (1) recruitment; and (2) our supply chain. We recognise that certain countries that we operate in have higher Modern Slavery risks than others. We also recognise that some of our customers may be at risk of exploitation if they build up significant gambling debts.

People and recruitment

We aim to attract a diverse workforce of people who are passionate about what they do, reflect our values, and want to do their best. This is reflected in our recruitment policies. Our workforce is 98% directly employed, giving us

direct visibility of recruitment and onboarding processes for most of our people. Our operating model does not depend on temporary or migrant workers, and as such, the Modern Slavery risk associated with such worker demographics is low.

We recognise that discrimination is both illegal and unethical and can act as an enabler of exploitation. Accordingly, we recruit, promote and reward people on merit. Our Global Equality, Diversity and Inclusion Policy sets out our commitment not to discriminate on the basis of a person's age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership.

We pride ourselves on having legal and ethical recruitment practices. As part of those practices, we ensure that an individual's legal right to work is checked; appropriate references are received; and suitable identity documentation is available to the candidate (i.e. they have access to their passport or equivalent in their name and it is not held by anyone other than the employee). For some roles (e.g. senior or specialist roles), identity confirmation checks are also carried out.

In 2024, we finished a thorough review of our existing local recruitment policies and consolidated these into one global Resourcing Policy that establishes minimum mandatory standards for all Entain's recruitment activity. This includes stringent measures to ensure that all recruitment processes adhere to anti-Modern Slavery laws and regulations.

Taking this further, in 2024 we began working with a single business partner to conduct the Group's pre-employment screening and right-to-work checks, enabling robust oversight and control of the recruitment process and reducing the risk of exploitation through unauthorised or unverified recruitment channels. These checks began in Q3 2024, to be completed and rolled out to 100% of locations by end of 2025.

Additionally, in the locations where People Services provide support (covering 85% of our total workforce) we conduct monthly reviews of employee address data. This helps us identify instances where multiple individuals are living at the same address, which can be a

potential indicator of Modern Slavery. If identified, further investigation is carried out by our People Compliance team to ensure there are no concerns in relation to Modern Slavery issues. There were no instances identified during 2024.

A new global Recruitment Platform has been implemented during 2024, which features enhanced monitoring capabilities to identify and address potential signs of Modern Slavery within our recruitment processes. These can then be investigated and addressed, further safeguarding against exploitation through the recruitment process. There were no instances identified during 2024.

We recognise and comply with a number of the indices given within the [Responsible Recruitment Toolkit](#) including:

- we have a business structure, business model and governance compatible with operating legally, ethically and sustainably;
- we do not use child labour or forced or compulsory labour, and opportunity and treatment is fair and equal, as set out in our policies above;
- legal eligibility to work is established;
- ethical standards of recruitment and labour supply are embedded through an effective applicant tracking system, which ensures recruitment is transparent, personal data is protected and the consistent and controlled application of procedures; and
- a worker-centred approach is taken to ensure high levels of worker job satisfaction and engagement – candidates applying for jobs with the Group are regularly asked for feedback on the recruitment process, which in turn informs continuous improvement efforts.

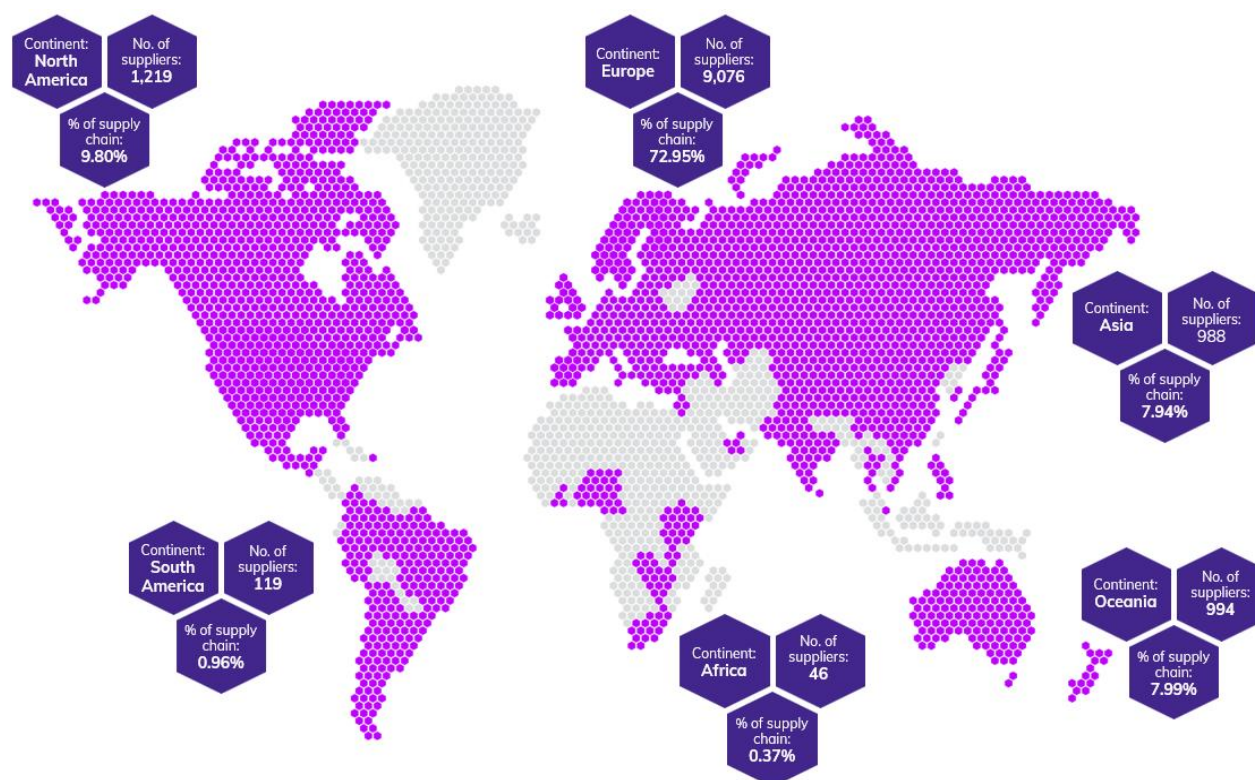
Key elements of our existing recruitment processes that mitigate against the risk of Modern Slavery include:

- we do not charge nor do we allow the use of recruitment fees at any stage of our process. We adhere to the “Employer Pays Principle” – we wholeheartedly agree that no worker should bear the cost of the recruitment process, particularly as this may make the individual more vulnerable to forced labour; and
- where it is necessary for us to use contract or freelance labour, all UK agencies we do business with are subject to the supplier due diligence process detailed above (where our agreement is not directly with the individual providing the contract or freelance labour) and are required to abide by the Supplier Code of Conduct. In the UK, we use a managed service provider, to ensure consistent processing of our contractors. All contractors within the UK are:
 - employed/engaged in a formal and lawfully recognised relationship appropriate to their working arrangements and they are offered regular work;
 - paid for all their working time, on time, and in accordance with national law and their contract/assignment details; and
 - welcome to take up opportunities directly with Entain should they wish to.

Supply chain

We source goods and services from more than 12,000 tier 1 suppliers, spending more than £3 billion across more than 75 countries – as presented by the below world map.

These goods and services range from computer equipment, telecoms and marketing material to utilities, travel, professional services, and content material. We recognise that our supply chain represents one of Entain’s biggest potential exposures to Modern Slavery.



Our Procurement team leads on sourcing and engaging reputable suppliers to meet the needs of the Group. They are spread out geographically (based in the UK, Ireland, Italy, Gibraltar, and India) to allow them to support the global business while offering localised support. They are split into five high-level category spend areas, which enables us to gain better insights into the risks associated with each area and more effectively manage potential risks:

- marketing (partnerships, digital & social media, sponsorships, PR & events, etc);
- content (data streaming, retail broadcasting, gaming, etc);
- corporate services (legal, HR services, audit, insurance, benefits, etc);
- information technology (infrastructure, cyber security, end-user services, etc); and
- property and retail operations (facilities, logistics, security, consumables, etc).

We carried out our first Modern Slavery supply chain risk assessment in 2022, where we

understood Modern Slavery risk to be more prevalent in our information technology, property and retail operations spend areas due to the underlying goods and/or services that are procured. We extended the risk assessment in 2024 with a lower supplier spend threshold. This approach allowed us to delve deeper into our supply chain and conduct a more comprehensive analysis of our supplier base.

Approximately 3,000 suppliers, almost double the number assessed in 2022, underwent the supply chain risk assessment, collectively accounting for more than £2 billion in supplier spend. The risk assessment incorporated several parameters, including the procurement purchasing category (using a detailed four-level taxonomy such as Technology – End User Services – Hardware – Printers), supplier country location, and GoodCorporation’s proprietary database of human rights risks by country. To ensure a comprehensive evaluation, the assessment also referenced internationally recognised indices, including the Global Slavery Index, the World Economic Forum’s Gender Gap Report, and the UNDP Environmental Sustainability Index.

Based on our analysis, we assigned each supplier a risk rating, low, moderate, high, or very high. This process identified 19 suppliers as very high risk, including subsidiaries of global groups. Through further detailed review, we found that eight of these very high risk suppliers were standalone, locally based entities, which we prioritised for further assessment using a desk-based questionnaire. They were deemed very high risk primarily due to geographical location and type of good/service provided, namely information technology, property and retail operations spend areas. These suppliers were located in India, the Philippines, and Hungary, with a combined annual spend exceeding £3.5 million. The other 11 very high risk suppliers were subsidiaries of larger global companies which posed less of a risk.

The desk-based questionnaire enabled us to gain a deeper understanding of their business operations, including internal governance controls and their maturity regarding Modern Slavery practices. All eight suppliers completed the questionnaire, and we provided tailored recommendations to help them enhance their Modern Slavery maturity. For transparency, we also shared our Group Modern Slavery Statement and introduced them to EcoVadis (as below), highlighting its benefits using our ESG Letter of Intent & Toolkit.

We recognise that the way we purchase goods and/or services can either support or undermine a supplier. Failure to pay supplier invoices on time can lead to an increased risk of Modern Slavery. We therefore strive to ensure the timely payment of suppliers in line with the terms of our Procurement Policy.

Due diligence

We continue to strive for excellence, transparency and enhanced due diligence procedures within our supply chains. We recognise that we are on a journey to iteratively improve our approach to supplier due diligence but are pleased to have continued to build upon the foundations already in place.

Bribery and corruption are often closely associated with other illegal behaviour, such as Modern Slavery, and so the implementation and operation of a comprehensive due diligence framework, as part of our Anti-Bribery, Corruption and Tax Evasion Framework ('Framework'), helps to mitigate any associated Modern Slavery risks.

Our Framework (which is periodically reviewed and updated) sets out all elements of our control framework for bribery, corruption and tax evasion risks, governing activities such as policies, training, risk assessments, gifts and hospitality and lobbying, which support our zero-tolerance approach to bribery, corruption, and tax evasion. The Framework also sets out detailed requirements defining how Entain conducts third-party due diligence. This ensures coordinated and consistent action is taken throughout the Group.

We ask any new supplier being engaged by the Group¹ to agree to adhere to the principles established by our Code of Conduct and our Supplier Code of Conduct (both of which refer to our expectations in relation to Modern Slavery). In addition, suppliers are asked to declare if they have been subject to any form of regulatory or other investigations or enquiries involving matters related to possible bribery or corruption. This is a key step in bringing Modern Slavery to the forefront of our business processes. Suppliers are screened at the time of onboarding to the Group and are monitored on a daily basis using a third-party due diligence tool to identify intelligence around risks such as (but not limited to) corruption, human rights abuses, or

¹ New acquisitions and a small number of legacy entities do not fully follow this process, but are either due to implement Group process, or operate their own processes that are materially similar.

environmental risks.

Entain has not to date had any Modern Slavery concerns raised via this screening but if a concern were to be flagged, this would be escalated to the Group Ethics team for investigation, assessment, and remediation (if appropriate) in line with the Global Investigations Policy.

As the world's largest platform for supplier sustainability ratings, EcoVadis continues to be an important step in our supply chain offering as we seek to drive supplier performance improvements. Throughout 2024, by building on our relationship with EcoVadis, we developed our core processes by:

- requiring suppliers to evidence where their goods and/or services are being procured from through our Request for Proposal ('RFP') tender documentation;
- encouraging winning RFP suppliers to go through the EcoVadis assessment;
- encouraging incumbent in-scope suppliers to undergo the assessment process; and
- incorporating the supplier assessment invite into our internal procurement demand management framework.

This resulted in assessing 46% of our in-scope suppliers - an increase from 35% in FY23. On average, we've found that our suppliers scored 60.8% (59.6% in FY23) on the EcoVadis network - that's 12.8% higher than the EcoVadis benchmark. Specifically in the labour and human rights area, our suppliers scored 62.2%, 11.4% higher than the benchmark.

As part of EcoVadis' four assessment topics (environment, labour and human rights, ethics and sustainable procurement), where necessary, we communicate corrective action plans including Modern Slavery actions via the platform. This is part of our general engagement and capability building efforts with our suppliers that go above and beyond ongoing contractual management.

As an added benefit, the platform also provides eLearning (including related to Modern Slavery) and webinars that are freely available for any supplier that goes through the platform. This is communicated through our supplier sustainability training material.

Efforts continue to transform the way that Entain identifies, assesses and manages third-party risks, with particular emphasis on supplier due diligence and pre-engagement risk assessment. We have now selected and partnered with a class-leading third-party risk management technology provider and intend to launch our revised approach during Q3 2025. Our updated approach will allow us to be significantly more risk-focused and will better leverage both technology and data in pursuit of increased risk management effectiveness and efficiency.

As per our Modern Slavery Strategy, we plan to finalise and launch the methodology and operationalisation of supplier site audits by the end of 2025.

Customers

We also recognise that some of our customers may be at risk of exploitation if they build up significant gambling debts. Accordingly, we take our approach to safer gambling very seriously and are committed to supporting safe and responsible use of our products. We strive to protect our customers by investing into research, education, and treatment initiatives, and have implemented a technology-led intelligent approach to help detect and reduce risky play. You can find out more about our approaches to safer gambling [here](#).

Additionally, we launched a Regulatory and Safer Gambling Charter that sets out core principles to guide our internal teams to ensure we always do what's right. The charter is built around four key pillars which set out a market-by-market approach to educate regulators on best practice while providing a framework for market-leading player protection in order to deliver the most entertaining experience to our customers across the globe.

Acquisitions due diligence

Entain aims to deliver sustainable and profitable growth. Our growth strategy

focuses primarily on organic growth and, albeit less frequently than in recent years, where appropriate, through targeted mergers and acquisitions.

Modern Slavery due diligence forms part of our comprehensive merger and acquisition due diligence process. Modern Slavery risk management, including mandatory training on Modern Slavery, continues to form part of our mandatory integration requirements.

Training and communications

In 2024, Modern Slavery training was included as part of the mandatory 'Big4' eLearning training programme, which also covered other ethics and compliance related topics such as safer gambling, data privacy and bribery. The Big4 is updated every year by the relevant subject matter experts to ensure content is up to date.

The training was available in 13 languages to ensure that we are educating our colleagues on the issue of Modern Slavery as effectively as possible and completed by over 24,000 colleagues.

In 2024, with the launch of the Big4 training modules, Entain committed to achieving a completion rate of 97.5% across the entire Group. This demonstrates our commitment to ensuring that all our people are aware of Modern Slavery and our confidence in our people's willingness to learn and do the right thing. To further embed our Code of Conduct and the behaviours we expect of all our colleagues (and as committed to in last year's statement), 10% of the annual bonus scheme was based on completion of the mandatory training to help drive the completion rate for our mandatory training. In addition, only those employees who completed all mandatory training modules received a bonus (those eligible on a Group bonus scheme), further demonstrating our commitment to ensuring our people receive relevant training.

We exceeded this target, achieving a final overall completion rate of 98.9%. The module which included Modern Slavery content achieved a completion rate of 99.3%.

In addition to the above training, we annually assess and identify higher-risk teams who need an enhanced understanding of Modern Slavery. During 2024, instructor led training was provided to relevant individuals from the Governance, Procurement, Internal Audit, People, Recruitment and Facilities teams. The enhanced Modern Slavery training explores the risks, their impacts, and how to identify and mitigate issues relevant to specific roles.

The Group received ad-hoc communications regarding Modern Slavery updates. Topics included sharing the publication of the 2023 statement, news stories highlighting human rights abuses and policy updates.

Monitoring progress and measuring effectiveness

Entain is committed to monitoring and improving the effectiveness of our Modern Slavery programme. We do this through the Modern Slavery Steering Group, our functional risk registers, our ongoing training and communications programme, our supplier due diligence procedure, our internal recruitment processes, and monitoring and assurance processes.

These areas are all considered periodically as part of Entain's internal audit programme.

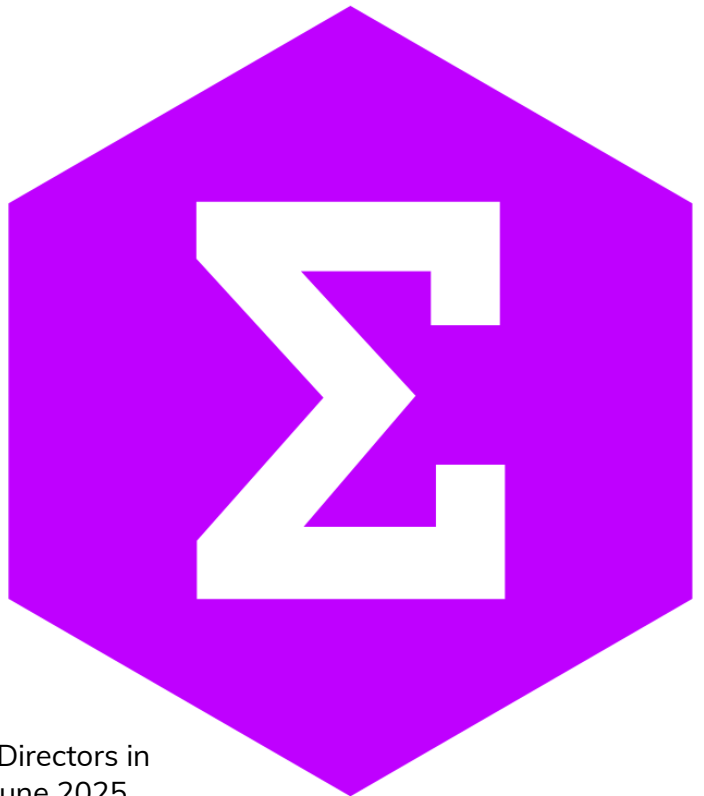
We continue to progress oversight in line with our Modern Slavery Strategy and continue to implement actions and KPIs that we can use to effectively monitor our activities in this area and measure their impact.

Looking ahead

In 2025, to further enhance our Modern Slavery programme, we will:

- launch a Group-wide third-party risk management solution to harmonise existing processes with technology improvements to further mitigate risks, including those around Modern Slavery;
- develop and implement a periodic, risk-based on-site audit process for Entain's highest risk business partners, based on the results of the supply chain risk assessment;

- continue to improve how we raise Modern Slavery awareness both internally and with our business partners; and
- continue to implement, operationalise, and monitor elements of Entain's Modern Slavery Strategy 2024-26, incorporating the required content as per the UK Government's guidance issued during 2025, where appropriate.



This statement was approved by Entain's Board of Directors in compliance with the UK Modern Slavery Act on 26 June 2025.

Entain plc | Incorporated in the Isle of Man under number 4685V
Modern Slavery and Human Trafficking Transparency Statement for Financial Year 2024

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