

Entain Group Anti-Fraud 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.

Accordingly, we have a zero-tolerance approach to fraud, 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-fraud perspective, and what we expect from everyone who works for us or does business with us.

Simon Zinger, Group General Counsel

Our policy

The principles of fair play, honesty and integrity underpin everything we do at Entain.

Fraud involves intentionally and dishonestly acting (or failing to act) to gain an (financial or non-financial) advantage, cause loss or avoid an obligation. It is our policy to never be dishonest, and in doing so, prohibit and prevent fraud. Entain has a zero-tolerance policy for fraud (including fraud which benefits Entain), in whatever form, anywhere in the world.

This Policy should be read in conjunction with the Group Travel & Expense Policy, the [Groups Gifts, Hospitality and Donations Policy](#), the [Group Conflicts of Interest Policy](#), the [Group Procurement Policy](#), and any related tier 2 (local) policy.

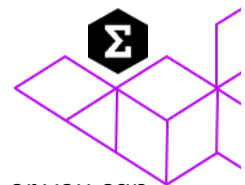
Responsibilities

We must:

- Act with the highest standards of honesty, propriety, and integrity in the exercise of our duties.
- Ensure that all documents we produce or oversee are fully accurate, complete, and not misleading, false or exaggerated.
- Follow all internal procedures designed to prevent and detect fraud (including, but not limited to, processes for setting up new commercial arrangements with suppliers, customers and other business partners, payment and travel & expense processes, and the Group Gifts, Hospitality and Donations registration process).
- Be familiar with and alert to warning signs of fraud that may be encountered (set out in our Anti-Fraud Guidance [here](#)) and report any warning signs to ethics@entaingroup.com.
- Complete all mandatory training by the completion deadline.
- Escalate customer fraud, security issues and potential anti-money laundering concerns as set out internally and in conjunction with the 'Raising your concerns' section below.

We must not:

- Be dishonest to gain an advantage, cause loss, or avoid an obligation, even if it benefits Entain or our customers.
- Assist or facilitate any third party including customers and business partners to commit fraud.
- Threaten or retaliate against anyone who refuses to take part in any conduct that may be dishonest or fraudulent or who reports any concerns that a breach of our policies or an offence may have 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 Group Ethics on 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 (including potential breaches by third parties acting on our behalf), raise it with 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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