

# Entain Group Conflicts of Interest Policy

## Our Policy

The principles of fair play, honesty and integrity underpin everything we do at Entain. A conflict of interest is any circumstance where our personal or business interests affect, or may appear to affect, our ability to objectively act in the best interests of Entain. Such conflicts within the scope of this Policy may be actual, perceived, or potential. It is our policy to disclose, record and, where necessary, manage all conflicts of interest. Trying to avoid these requirements by acting through another person or mechanism is not allowed.

## Responsibilities

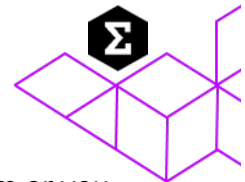
### We must:

- Always act in the best interests of Entain rather than our own personal interests or the interests of others.
- Avoid situations that may, or could reasonably be perceived to, compromise our judgment, decisions, or actions for Entain. Such situations could include personal relationships with colleagues or with employees of suppliers or competitors, or secondary employment and/or income.
- Promptly complete the Conflict of Interest Declaration Form\* available [here](#) as soon as an actual, perceived or potential new conflict arises or is identified that can reasonably be regarded as giving rise to a conflict of interest.
- Complete a New Joiner Conflict of Interest Declaration Form\* available [here](#) within 30 calendar days of joining Entain to disclose any conflicts or confirm there are no conflicts to declare.
- As a manager, promptly review, approve (with mitigations if necessary) and monitor all conflict of interest declarations and associated mitigations for our direct reports in line with this Policy.
- Reject any business practice which might be deemed improper (including improper practices which might benefit Entain).

\* Retail shop colleagues below Area Manager level or equivalent do not need to use the Ethics Registers, but do need to notify their line managers. Further guidance is available [here](#) or from [ethics@entaingroup.com](mailto:ethics@entaingroup.com).

### We must not:

- Use our authority or position at Entain for personal gain.
- Allow a personal or business interest to influence our work for Entain.
- Seek to conceal any conflicts of interest.
- Work for, receive payment from or advertise any organisation which is in competition with Entain, or which is engaged in activities which may bring Entain into disrepute.
- Be involved in the recruitment process for a family member or close associate without first disclosing our relationship and seeking prior approval.
- Use or share Entain information, assets or resources or our position at Entain for personal gain.
- Unless disclosed, approved, and managed in accordance with this Policy:
  - work for or provide services to someone outside of Entain where this may interfere with our Entain responsibilities or our ability to make objective decisions for Entain
  - conduct Entain business with a close family member, associate or third party with whom we have a close relationship.



## 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](mailto: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, 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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**Classification: Public**

**Tier: 1**