



MODERN SLAVERY AND HUMAN RIGHTS STATEMENT

ALL-STM-001

May 2024

SCOPE

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the Act) and sets out the steps which Playtech has taken during the financial year ending 31 December 2023 and have planned for 2024 in order to prevent modern slavery from occurring in its operations and supply chain as well as plans for the future. This statement is made on behalf of Playtech plc and those of its subsidiaries that are required to report under the Act.¹

BUSINESS OVERVIEW

Playtech is a leading technology company in the gambling industry providing online gaming and sports betting software including business intelligence driven gambling software, services, content and platform technology across the industry's product verticals, including casino, live casino, sports betting, virtual sports, bingo and poker. Playtech provides its technology on a Business-to-Business (B2B) basis to the industry's leading retail and online operators, land-based casino groups and government sponsored entities such as lotteries. As of June 2018, through the acquisition of Snaitech, Playtech directly owns and operates the leading sports betting and gaming brand in online and retail in Italy. Snaitech operates a B2B2C model as a service provider, allowing franchisees to utilise the Playtech technology stack in the retail environment while operating the leading brand, Snai, directly online as a Business-to-Customer (B2C) business. Alongside its industry leading products and services, Playtech has worked with its licensees to raise industry standards in responsible business and safer gambling. Through Playtech Protect, Playtech has pioneered the use of research, data and artificial intelligence to develop products to identify at-risk customers and deliver tailored safer gambling interventions to customers.

Playtech plc is the parent company of the Playtech group (the "Group") and the head office is in the United Kingdom. The Group has c.7,700 employees across 19 countries; the list can be found in the [Responsible Business and Sustainability Addendum to the Annual Report 2023](#).

In its operations, the Group's supply chain primarily consists of software, technology and technology infrastructure products and services as well as professional advisory and support services. In 2023, the top three supplier countries by spend are the United Kingdom, Gibraltar and Israel.

COMMITMENTS

The Group is committed to uphold and respect human rights across its operations and supply chain. This is a core element of the Group's overall commitment to responsible business practices.

The Group remains committed to respecting and upholding the principles embodied in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on

¹ Playtech Software Limited, Playtech Services Malta Limited, Playtech Services (Cyprus) Limited, Best Gaming Technology GmbH, Snaitech SPA and VF 2011 Limited.

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Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The Group is taking steps to ensure it is not complicit in the violation of human rights. This includes working to prevent modern slavery in its own business and supply chains. Modern slavery can occur in many forms, including forced labour, bonded labour, such as debt bondage through recruitment fees, child labour, domestic servitude, human trafficking and workplace abuse. The Company advocates for equal pay for equal work, promotes a healthy work-life balance by reducing excessive working hours.

Every employee has the responsibility to uphold the principles set out in this statement in addition to complying with the Group's Code of Ethics and Business Conduct Policy. Employees are required to adhere to these principles, and to all related policies, practices and procedures.

POLICIES

In 2023, Playtech reviewed and updated its Procurement policy to strengthen its internal process related to fulfilling the company's sourcing needs and building sustainable commercial relations based on trust, mutual respect, and common values. Playtech also conducted its annual refresh of its Business Ethics, Anti-Bribery and Corruption and Speak Up policies to strengthen oversight and mitigate compliance, ethical, social and climate-related risks when entering into business relations, including joint ventures. In 2023 Playtech published its first Supplier Code of Conduct, which sets out the Company's commitments and expectations of its suppliers to:

- Comply with applicable laws and regulations, and obtain and operate in accordance with all applicable permits, licenses and registrations;
- Behave ethically and with integrity;
- Respect human and employment rights;
- Promote the health, safety and well-being of employees;
- Embrace sustainability and operate in an environmentally responsible manner;
- Respect privacy and maintain confidentiality; and
- Implement systems to maintain business continuity and performance.

During 2023, Playtech reviewed and refreshed its Global Health and Wellbeing policy and continued to support the physical, mental, social and financial wellbeing of its workforce. Playtech also launched its Global Employee Wellbeing Benevolent Fund, an initiative to provide crucial financial support to colleagues and their immediate families who may encounter unforeseen, severe, life-changing challenges such as medical emergencies, severe illness, and financial hardship. To continue and support its workforce in hybrid working, Playtech communicated working arrangements to establish a safe and inclusive working environment for the office and remote working set up, addressing contractual working hours and overtime. The policy refers to training materials and channels of escalation for work-related health and safety hazards.

The Group also published its Board Diversity policy to support Playtech's commitment to recruit from a diverse, qualified group of candidates with a mixture of skills, professional and industry backgrounds, geographical experience and expertise, gender, tenure, demographics, disability, ethnicity and diversity of thought, which are instrumental for the long-term success of the Company. The Company also rolled out a Global Bullying, Harassment & Respect policy, supported by the launch of an online unconscious bias training to all employees as well as a bullying and harassment training for managers.

In early 2024, the Group refreshed its Global Talent Acquisition policy confirming Playtech's commitment to responsible recruitment from a diverse, qualified group of candidates. The Company intends to continue to review and update its policies, including its Board Diversity and Human Rights Policies, as well as its requirements for suppliers and business partners.

GOVERNANCE AND ACCOUNTABILITY

Playtech's Sustainability and Public Policy Committee has ultimate responsibility for overseeing the Company's approach to human rights and its actions to mitigate modern slavery. The Committee comprises of Linda Marston-Weston (the Chair) and two other Board members. The Committee is responsible for reviewing, monitoring, and advising on Playtech's sustainability, responsible business and public policy matters, as well as remediation actions, if modern slavery is found.

The Sustainability and Public Policy Committee also review the use, effectiveness, and implementation of the Human Rights policy every 12 to 18 months, considering its suitability, adequacy, and effectiveness.

RISK ASSESSMENTS

As a provider of software and technology services to the gambling industry, Playtech recognises that human and labour rights and modern slavery issues can occur in the technology sector supply chain. High risk issues within the technology sector supply chain include recruitment practices, discrimination, workplace practices (including at raw material stage, particularly concerning technology hardware), privacy and data protection concerns.

Key areas of focus for Playtech during 2023 included the reinforcement of processes and procedures for managing third parties used in employment practices, reviewing and strengthening audit procedures and strengthening supplier human rights assessments. In 2023, Playtech continued to enhance its supplier risk approach to identify sectoral risks as well as risks from their geographical location.

A third-party company with expertise in human rights and modern slavery was appointed to assist with the risk assessment and update our approach. A risk assessment matrix was used to conduct this exercise, examining sectoral risk, country risk and spend data to prioritise actions to strengthen risk mitigation actions. As part of this exercise, the Company reviewed 140 supplier sectoral categories and has specified a human rights and modern slavery risk rating from "low" to "high" to each category. The Group has identified 71 "high" and "medium" categories as priority categories. To identify country-specific risks, the Company utilised external indices, including the UN Human Development Index, Freedom House's Freedom in the World Civil Liberties, the US State Department's Trafficking in Persons report, the Global Slavery Vulnerability Index and the World Bank Worldwide Governance Indicators – Regulatory Quality, with the addition of the UNICEF Child Rights Atlas – Workplace Index. Using a combination of sectoral risks, country risks and a spend thresholds, this exercise enabled the company to identify the most relevant suppliers to engage with in order to mitigate potential risks. In 2023, this group of suppliers represented 6.3% of our total spend.

In 2024, the Company will continue to conduct a deep dive review of responses from the high-risk suppliers identified through the assessment process. The Company will also broaden its engagement with those suppliers. Playtech will also conduct an in-depth review of relevant internal controls and processes across the organisation.

DUE DILIGENCE PROCESSES AND THIRD PARTIES

Playtech continues to implement and strengthen its approach to managing third parties as part of its compliance programme. As part of its compliance risk assessment procedure, Playtech requires third parties (including suppliers, partners and customers) to complete a questionnaire. This questionnaire requires them to provide details of any policies, procedures, statements or programs they have in relation to human and labour rights (including modern slavery). This enables Playtech to assess third parties' commitments to upholding human and labour rights. Due diligence on suppliers, individuals and organisations, is monitored on an ongoing basis using a centralised, automated portal, that is programmed to monitor and flag a range of compliance issues, including human rights and labour rights issues on a case-by-case basis to assess risk and actions required.

Playtech continues to require its customers, suppliers and other business partners to act in accordance with international human rights standards. To support this, Playtech uses contractual requirements to explicitly oblige the suppliers and third parties in their supply and delivery chains as well as the rest of the commercial ecosystem to adhere to human rights and modern slavery regulations.

During 2022, the Company developed a dedicated human rights and modern slavery questionnaire. The questionnaire includes questions for suppliers on their management systems, employee composition and labour practices. The analysis of responses enables Playtech to understand more about the ways in which our suppliers are managing their own human rights risks within their operations and supply chains. The questionnaire includes questions related to supply chain mapping, management of labour agents, outsourcing and subcontracting as well as their own due diligence, such as how they manage their recruitment processes.

In 2023, Playtech initiated its engagement with the suppliers flagged as high-risk through our risk assessment process using a self-assessment questionnaire. Playtech expects suppliers to acknowledge the expectations contained in the Supplier Code of Conduct in writing and to agree to conduct their businesses in line with them. The Company will continue its engagement and in-depth review of its internal processes and effectiveness of its approach to ensure any gaps are identified and corrected.

ENGAGING WITH TRADE UNIONS AND WORK COUNCILS

Playtech respects and supports the rights of its employees to organise and participate in trade unions and work councils. Playtech actively and constructively engages with trade unions and work councils in a number of markets including Sweden, Italy, Germany and Austria.

TRAINING AND AWARENESS RAISING

Playtech has made this statement available to employees and stakeholders on the Playtech plc website and the Company's intranet. In addition, Group policy updates are communicated to staff via their local human resources focal points as well as through our annual compliance training programme.

During 2023, the Company continued to deliver a refreshed human rights and modern slavery mandatory training and awareness to all employees and contractors, with 93% completion, as well as a health and safety training for office-based employees. In 2024, Playtech will continue to broaden awareness and reach across the Group through targeted sustainability training and workshops, including modern slavery and human rights for relevant functional roles, including procurement, legal, finance and HR.

MONITORING AND REPORTING

In 2023, the Group continued to monitor and track potential human rights and modern slavery issues as part of its overall compliance risk management programme, and report on progress to the Sustainability and Public Policy committee of the Board. The key performance indicators (KPIs) that are currently monitored include:

- Number of reports raised through the Speak Up/whistleblowing hotline;
- Number of reports raised directly with the HR function;
- Number of flags raised through the compliance KYC portal and monitoring tool;
- Number of risky suppliers identified following the human rights and climate risk assessments; and
- Human Rights training completion rate for employees and contractors;
- Number of ethical and human rights issues raised via Joint Ventures risk assessments.

When issues are identified, the Compliance function, with the support from HR on human rights in the workplace and the Sustainability team for human rights in the supply chain, reviews and defines the best course of action and resolution on a case-by-case basis.

The Group continues to promote an independent, confidential "Speak Up" line for employees to use to report any ethical or legal concerns, including human and labour rights concerns, anonymously, wherever permitted under local legislation. This is communicated via global campaigns, local human resource focal points and promoted during annual compliance training.

During 2023, Playtech had 11 incident reports, anonymously submitted in writing via the Speak Up platform. These incidents triggered the internal review and escalation process to the Chief Compliance Officer and General Counsel for review and have now been resolved. No human rights and/or modern slavery issues raised via this channel. Suppliers and business partners are also encouraged to report any behaviour that may be in breach of the Supplier Code of Conduct promptly via the independent anonymous "Speak up" line or using the freephone numbers available on the Speak Up landing page.

Playtech will continue to report on measures it takes to identify and mitigate human rights and modern slavery risks as part of its annual sustainability reporting as well as its annual reporting as per the Modern Slavery Act in the UK and other relevant markets.

This statement was approved by the Board of Directors of Playtech plc on behalf of Playtech plc and as the management body for each reporting entity on 31st May 2024.

Mor Weizer

CEO, Playtech plc