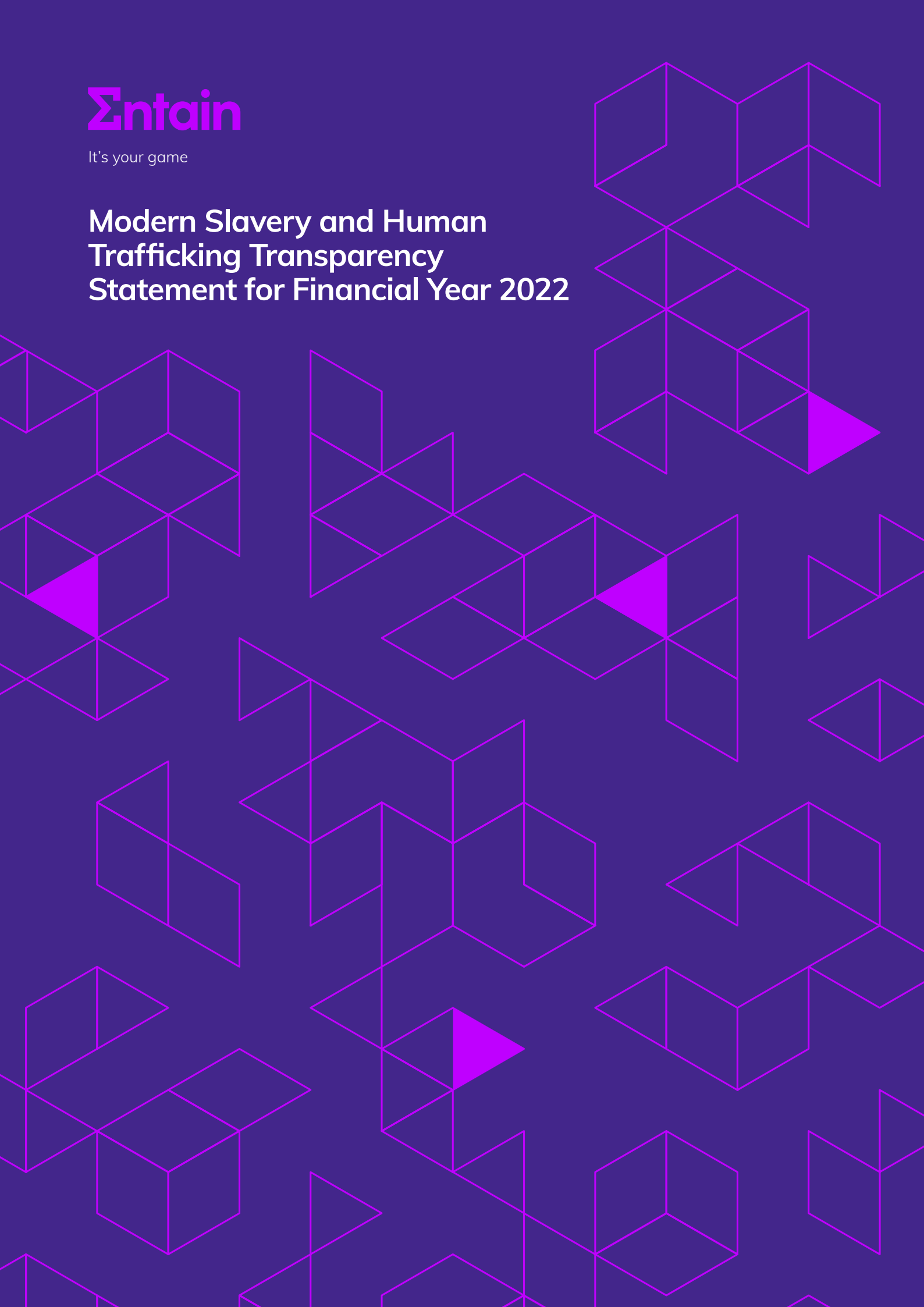




It's your game

Modern Slavery and Human Trafficking Transparency Statement for Financial Year 2022



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The following statement is written in accordance with the requirements of section 54(1) of the UK Modern Slavery Act 2015 and is applicable to Entain plc and its subsidiaries¹ (hereafter ‘Entain’, the ‘Group’, the ‘Company’, ‘our’ or ‘we’).

The statement sets out the Group’s activities and measures taken between 1 January 2022 and 31 December 2022 to mitigate the risk of modern slavery, servitude and forced or compulsory labour, human trafficking, sexual exploitation and child labour (together ‘Modern Slavery’) occurring within our own operations and extended supply chains.

¹ Relevant subsidiaries in scope of the UK Modern Slavery Act’s disclosure requirement and making this statement for the financial year 2022 are: Ladbrokes Betting & Gaming Limited, LC International Limited and Entain Marketing (UK) Limited. A full list of subsidiaries within the Group can be found on pages 218-224 of the 2022 Annual Report, available [here](#).



Introduction from Entain's CEO

"At Entain, everything we do is aimed at delivering the very best in betting, gaming and interactive entertainment. We are one of the world's largest groups in this sector, operating in regulated and regulating online and retail markets.

Our unique platform distinguishes us as an operator, enabling us to grow our core business while expanding into new areas of growth, embracing new opportunities, all with a customer-centric approach. Entain's vision is to be the world leader in sports betting, gaming and interactive entertainment. Our purpose is to bring moments of excitement into people's lives. Our vision and purpose are underpinned by our corporate values of excite our customers; drive innovation; do what's right; win together; and be bold².

As part of our strategy to achieve this vision, we aim to meet, and exceed, the highest standards in everything we do, from the way we run our business to the way we support our colleagues, our customers and our communities. **We recognise that Modern Slavery is a significant issue across the globe and within countries in which we operate.**

We are committed to acting morally, honestly, openly and with integrity in everything we do. We firmly believe that a robust approach to protecting human rights and addressing Modern Slavery risks in our business and supply chains is one way we can evidence this commitment, alongside our positive contribution to the communities in which we work and to society at large. We take our legal responsibilities extremely seriously but also recognise that our commitment to the prevention of Modern Slavery goes far beyond a legal duty.

This statement sets out what we have achieved in 2022 and how we will continue to develop our approach to managing Modern Slavery risks as we strive for our goal of eradicating modern slavery within our business and supply chains."

Jette Nygaard-Andersen
Chief Executive Officer

² Note these values are being updated during the summer of 2023.

Summary of our achievements in 2022

In 2022, our key risk mitigations activities included continuing our partnership with Unseen, the anti-modern slavery charity; mandatory training for employees on Modern Slavery across the Group and as part of new joiners' induction training; updated policies and a new Code of Conduct that included Modern Slavery; and continued monitoring of Modern Slavery risks across our supply chains.

New activities that took place in 2022 include:

- tying 15% of the Entain Group annual bonus to minimum completion levels for mandatory training modules, including Modern Slavery;
- adding appropriate Modern Slavery clauses in terms and conditions with affiliates, recruitment agencies and suppliers;
- an internal audit of Entain's risk mitigation framework, including looking at recruitment, employment management and payroll processes, due diligence processes for third parties and the efficiency and usage of training programmes about Modern Slavery;
- a risk assessment of our suppliers, mapping areas where Modern Slavery could be more prevalent, enabling us to rate suppliers from a Modern Slavery risk point of view and the development of a new supplier due diligence framework; and
- a new partnership with EcoVadis, to further strengthen our supplier due diligence.

An overview of our business and structure³

Entain plc, a global FTSE 100 company, is one of the world's largest sports-betting and gaming groups, operating both online and in the retail sector. Tax resident in the UK, with operations in over 40 regulated or regulating territories, the Group employs a workforce of around 29,000, in over 20 offices across five continents.

The Group owns a comprehensive portfolio of over 30 leading brands. Entain's sports brands include: bwin; Coral; Crystalbet; Eurobet; Ladbrokes; Neds International; 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, e-sports and sports betting), and, in addition to our business-to-consumer (B2C) operations, provides services to third-party customers on a business-to-business (B2B) basis, such as licensing technology.

In the US, the Group operates BetMGM, a joint venture with MGM Resorts International, created to expand into this exciting market and maximise the opportunities presented by the regulation of sports betting and gaming in the US.

Leading brands

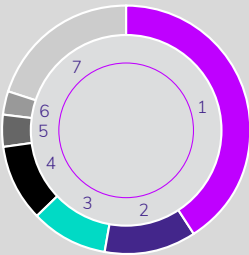


³ Figures taken from the Entain 2022 Annual Report.

At Entain, doing what’s right is what underpins our approach to business. We want to be known as 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’s footprint around the world:

2022 Net Gaming Revenue Split by geography



1. UK	41%
2. BETMG	12%
3. Italy	10%
4. Australia	10%
5. Brazil	4%
6. Germany	3%
7. Row	20%

>130 licences across
>40 territories

130+

Offices worldwide

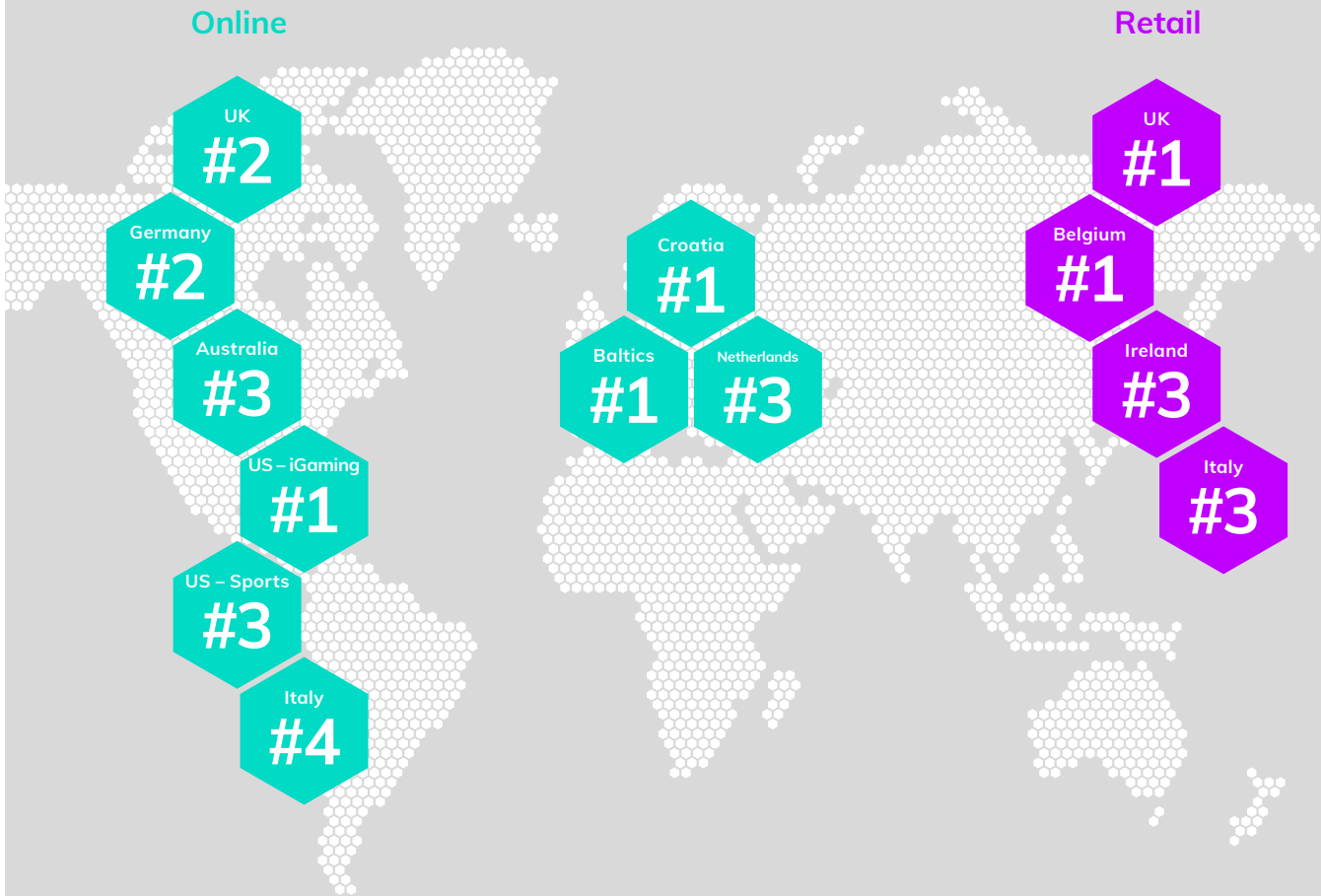
20+

Currencies accepted

42

Languages offered

33



An overview of our supply chains

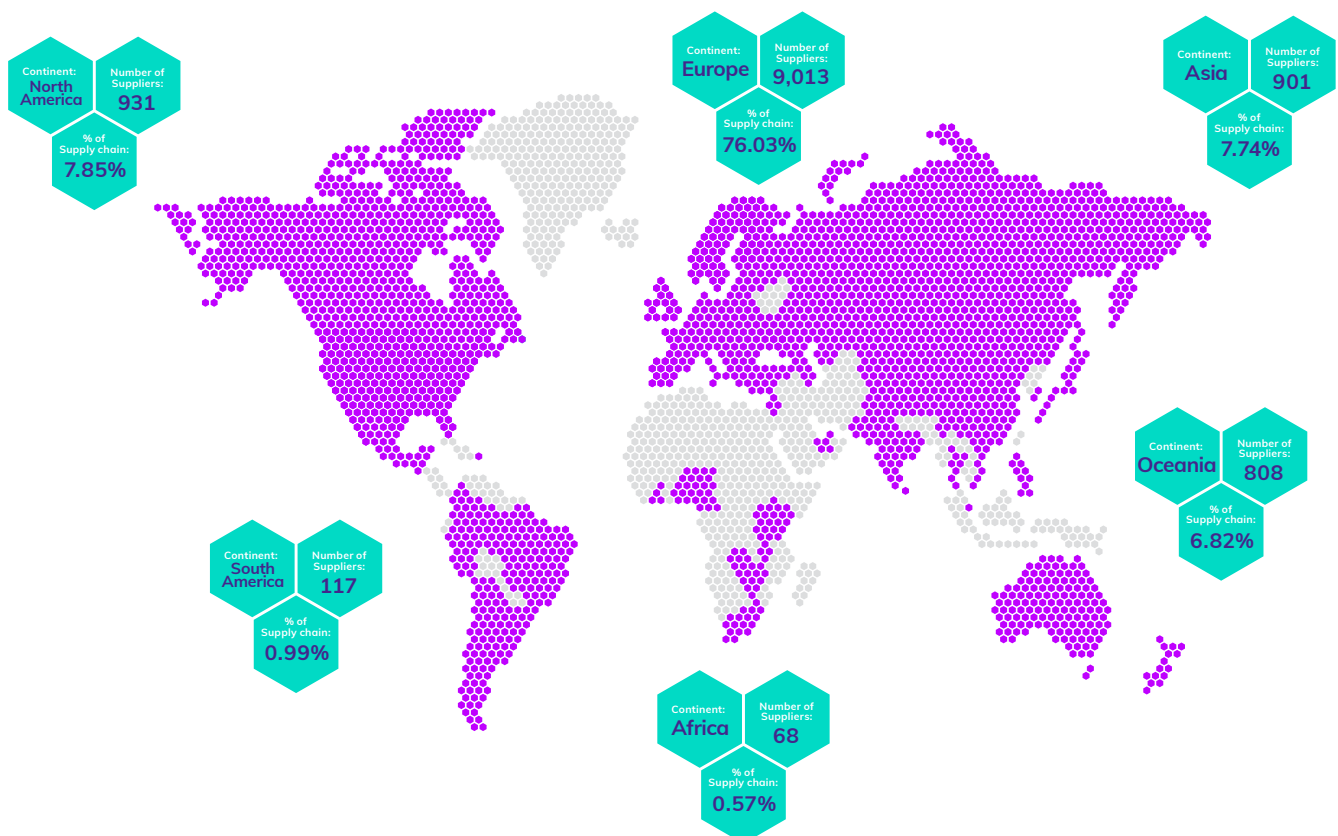
We have large and diverse supply chains as we source goods and services from more than 8,250 tier 1 suppliers spending £2.7bn across more than 80 countries – as presented by the world map below. These goods and services range from computer equipment, telecoms and marketing material to utilities, travel, professional services and content material. We recognise that this represents one of Entain's biggest potential exposures to Modern Slavery

Our Procurement team lead 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, Austria 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):

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

Mapping of where our tier 1 suppliers are located, demonstrating the scale of our global supply chain



Collaboration on Modern Slavery

In 2022, we have proudly continued to partner with Unseen, a leading sector charity who were founded in 2008 with the aim of eradicating Modern Slavery. They also run the UK's 24/7 independent and confidential Modern Slavery & Exploitation Helpline. The helpline provides support for potential victims of Modern Slavery and offers a way for businesses and the general public to raise concerns.

In 2022, Entain joined Unseen's Business Hub, a collective of like-minded businesses committed to improving and strengthening their approach to tackling worker exploitation and Modern Slavery, gaining access to expert webinars and insights, as well as tailored support and guidance from a dedicated Account Manager. This partnership provides ongoing advice, training and education to Entain. Unseen continue to support us on our journey of continuous improvement towards our long-term future goal of having in place a world-class programme to eradicate the risk of Modern Slavery within our business and supply chains and have helped us to move forward significantly with this. We continue to learn from their sector expertise to develop our own understanding of Modern Slavery. We welcome and enjoy the scrutiny, challenge and support of this partnership and are pleased to be able to support their efforts in eradicating this serious issue.



In 2021, Unseen undertook a comprehensive gap analysis of our current Modern Slavery approach (as set out in our 2021 Modern Slavery statement). The majority of the recommendations coming out of that gap analysis have been implemented, ensuring we are improving the effectiveness of our processes for identifying and mitigating any Modern Slavery risks in our business and our supply chains.

Entain policies that are relevant to Modern Slavery

Global Code of Conduct

Our Code of Conduct forms the backbone of our expectations for all people (employees and suppliers) who work for, or with, Entain. It is a summary of the standards, policies and principles of fair play, honesty and integrity that underpin Entain and is based upon our corporate values. It is reviewed annually and was updated in April 2023. Each new version of the Code of Conduct is approved by the ESG Committee (now the Sustainability and Compliance Committee, discussed further below).

Our approach to Modern Slavery is supported by the Code of Conduct, which applies across the entire Group. The 2022 Code of Conduct included a statement from our CEO, Jette Nygaard-Andersen, emphasising Entain's commitment to upholding the highest standards in everything we do. It explicitly set out Entain's commitment to preventing Modern Slavery and that we expect the same commitment from our employees and business partners. It also set out 10 guiding principles that govern how we do business. Those most relevant to the prevention of Modern Slavery are:

1. We take all allegations of malpractice and misconduct seriously and will deal with individuals' concerns confidentially and sensitively.
2. We promote equality, diversity, and inclusion in all our working practices.
3. We act with tolerance and empathy. There is no place in our company for bullying, harassment, victimisation, violence, threats of violence or abuse of any kind.
4. We are committed to providing a safe working environment that promotes our people's safety, health and wellbeing.

Global Modern Slavery & Human Rights Policy

In October 2022, we reviewed and updated our Modern Slavery & Human Rights Policy, which sets out our commitment to preventing Modern Slavery. The Policy, which was approved by the ESG Committee forms part of our educational efforts for employees and includes a description of Modern Slavery, warning signs to look out for, our expectations of all employees, including the requirement to not use forced or compulsory labour, comply with all applicable employment standards, take reasonable steps to ensure suppliers adhere to these requirements and raise any suspicions using our established Speak Out Policy. Given the changing global legislative landscape in this area, this Policy is reviewed annually. For the first time in 2023, the Policy was published on our corporate website, making it publicly available.

Global Anti-bribery & Corruption Policy

Our Anti-Bribery & Corruption Policy sets out the standards of behaviour we expect to ensure the integrity of our supply chains and reduce the risk of bribery and corruption across our business. Bribery and corrupt behaviour can often be closely associated with other illegal behaviour, such as Modern Slavery, and so this Policy helps to mitigate any associated Modern Slavery risks.

The Policy highlights red flags (many of which can also be potential indicators of Modern Slavery), such as improper business practices, cash payments; non-standard or customised invoices; or special relationships with government officials. The Policy is reviewed annually and approved by the ESG Committee (now the Sustainability and Compliance Committee). It was last updated in September 2022.

Global Procurement Policy

The objective of the Procurement Policy is to offer an efficient, informative and standardised approach to how the Group manages suppliers across the procurement lifecycle – from how we seek out new suppliers to tendering, selecting, contracting and managing the associated third-party risk(s) through to exit. The Policy ensures common minimum standards are applied through the lifecycle of an agreement with a supplier, as suppliers are required to adhere to our key policies, including the Supplier Code of Conduct (see below) and the Entain Code of Conduct. The Policy specifies that appropriate due diligence and risk management is conducted, amongst other requirements. The Policy is reviewed annually by the Procurement Team and was last updated in January 2023.

The Procurement team require all suppliers to comply with and adhere to all applicable international labour laws in accordance with the principles of the International Labour Organisation ('ILO'), United Nations ('UN') Global Impact and the UN Declaration of Human Rights. Failure to pay supplier invoices on time can lead to increased pressure on suppliers leading to a higher risk of modern slavery in our supplier chains. We therefore strive to ensure the timely payment of suppliers in line with the terms of the Procurement Policy.

Global No PO, No Pay Policy

We operate a No PO Purchase Order, No Pay Policy that is referenced in our Procurement Policy and widely communicated across the Group. This ensures all suppliers⁴ are vetted (as set out below in the Due Diligence section) which ensures that the right due diligence is being undertaken to mitigate, amongst other things, risks related to Modern Slavery. The Policy is reviewed annually by the Procurement, Finance and Finance Evolution Teams and was last updated in February 2023.

Global Supplier Code of Conduct

The Supplier Code of Conduct sets out the social, ethical and environmental standards that Entain expects from everyone who does business with us as a supplier or business partner anywhere in the world. It is aligned to the UN's Sustainable Development Goals. These principles apply irrespective of supplier size, geography or goods/services offering. Any new supplier must read and agree to the Supplier Code of Conduct prior to their onboarding with Entain. It includes the 10 guiding principles set out in the Entain Code of Conduct and requires suppliers to comply with all applicable laws, regulations and codes of practice, including human rights and employment laws. Any potential breaches must be notified to Entain promptly and suppliers are able to use a confidential whistleblowing email address to raise concerns (see the Speak Out Policy below). We expect suppliers to support the principles of the UN Global Impact, the UN Declaration of Human Rights and the ILO's 1998 Declaration on Fundamental Principles and Rights at Work.

The Supplier Code of Conduct is reviewed annually and was last updated in October 2022.

The Global Supplier Code of Conduct sets out the minimum labour standards Entain expects from all our suppliers. It explicitly states that suppliers must:

1. not use child labour either directly or in their supply chain and ensure they have adequate procedures and measures in place to prevent this;
2. not use forced labour;
3. ensure workers have the freedom to terminate their employment contract without unlawful penalty;
4. pay their workers at least the legal national minimum wage and provide workers with clear payroll statements;
5. provide benefits to workers that meet legal minimum standards and not unfairly deduct any benefits from their wages;
6. ensure workers do not exceed the maximum number of hours worked as set by local law;
7. not unreasonably restrict workers' freedom of movement;
8. value diversity and protect the health, safety and wellbeing of their workers; and
9. respect the rights of workers to exercise free association.

Global Speak Out Policy (Whistleblowing)

The Speak Out Policy encourages people to speak out about any behaviour that might be illegal, unethical or that breaches our Code of Conduct. The Policy specifically lists Modern Slavery issues (including paying fees to obtain jobs at Entain, poor labour practices or poor working conditions) as an example of the sort of issues that can be reported. It confirms that reports can be made in relation to third-party suppliers.

Concerns can be raised to a line manager or the People Team, Entain's secure, confidential 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 to the hotline confidentially (and anonymously if desired) 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 and in 15 languages.

All reports of misconduct or potential misconduct raised through our Speak Out channel 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 2022, 51 Speak Out reports in total were received by the hotline and investigated (compared to 29 in 2021). The Policy is reviewed annually and approved by the Audit Committee. It was last updated in July 2022.

Accessing and Embedding Entain Policies

Our policies are available to all Entain employees, either through our Entain.me online platform or through local equivalents. The Code is currently available in 12 languages to guarantee it is accessible for all our employees⁵. Our key policies (the Code of Conduct, Modern Slavery Policy and the Supplier Code of Conduct) are available externally on the Entain Group corporate website on the [Policy Statements](#) page.

When the updated Code of Conduct was launched in March 2022 (alongside the mandatory training module that accompanied it), it was supported by a comprehensive communications campaign using a variety of communications channels, to ensure active engagement with the new Code. Our Code of Conduct and other key policies (including our Anti-Bribery and Corruption Policy) are part of our induction programmes, with all new joiners receiving access to these policies before they start working at Entain. This ensures they are aware of our required standards before they start working at Entain.

The Code of Conduct and key policies are also supported through an effective training programme (see below). As part of this, in 2022 employees had to attest to having read the Code of Conduct as part of this training.

4 Provided the relevant Entain entity is using our supplier management tool. A small number are not, such as recently acquired entities.

Updates to key policies, such as the Procurement Policy and the Anti-Bribery & Corruption Policy, are also supported by Group-wide communications across a variety of channels to raise awareness.

Breaches of the Code of Conduct and Policies

Entain takes breaches of our Code of Conduct, policies and procedures very seriously and will investigate and take action against colleagues as appropriate. This may result in colleagues being disciplined and potentially dismissed, where a breach has been identified.

Supplier or partner contracts may be terminated in the event of a breach of the Supplier Code of Conduct; however, we will always try to resolve issues collaboratively in the first instance. We recognise that suppliers who have failed to meet our required standards will often have done so inadvertently, so we make every effort to ensure a safe environment for suppliers and their workers to speak up about any concerns.

Other Best Practices

Entain has a Grievance Policy and procedure that colleagues are able to utilise if an individual feels there are work-related issues they wish to raise informally or in a more structured, formal manner. Matters are investigated fully and addressed as appropriate, in line with best practice and policy.

Entain also has multiple Employee Forums in place across a number of its locations. Employee Forums are a platform for a two-way dialogue to discuss matters, including information and consultation, between its people and leaders. Employee listening sessions are held on an ad hoc basis, across the differing business units, allowing individuals and leaders to discuss topics that are relevant in nature.

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, exploring our company and its ways of working, along with an opportunity to discuss environmental factors that impact our organisation.

In addition to the 10 guiding principles in our Code of Conduct, Entain recognises and adheres to 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 practiced;
8. regular employment is provided; and
9. no harsh or inhumane treatment is allowed.

⁵ The 2022 Code was available in seven languages. Note the Code of Conduct has been updated in March 2023 and so this is the version currently available online, not the 2022 version.

Governance

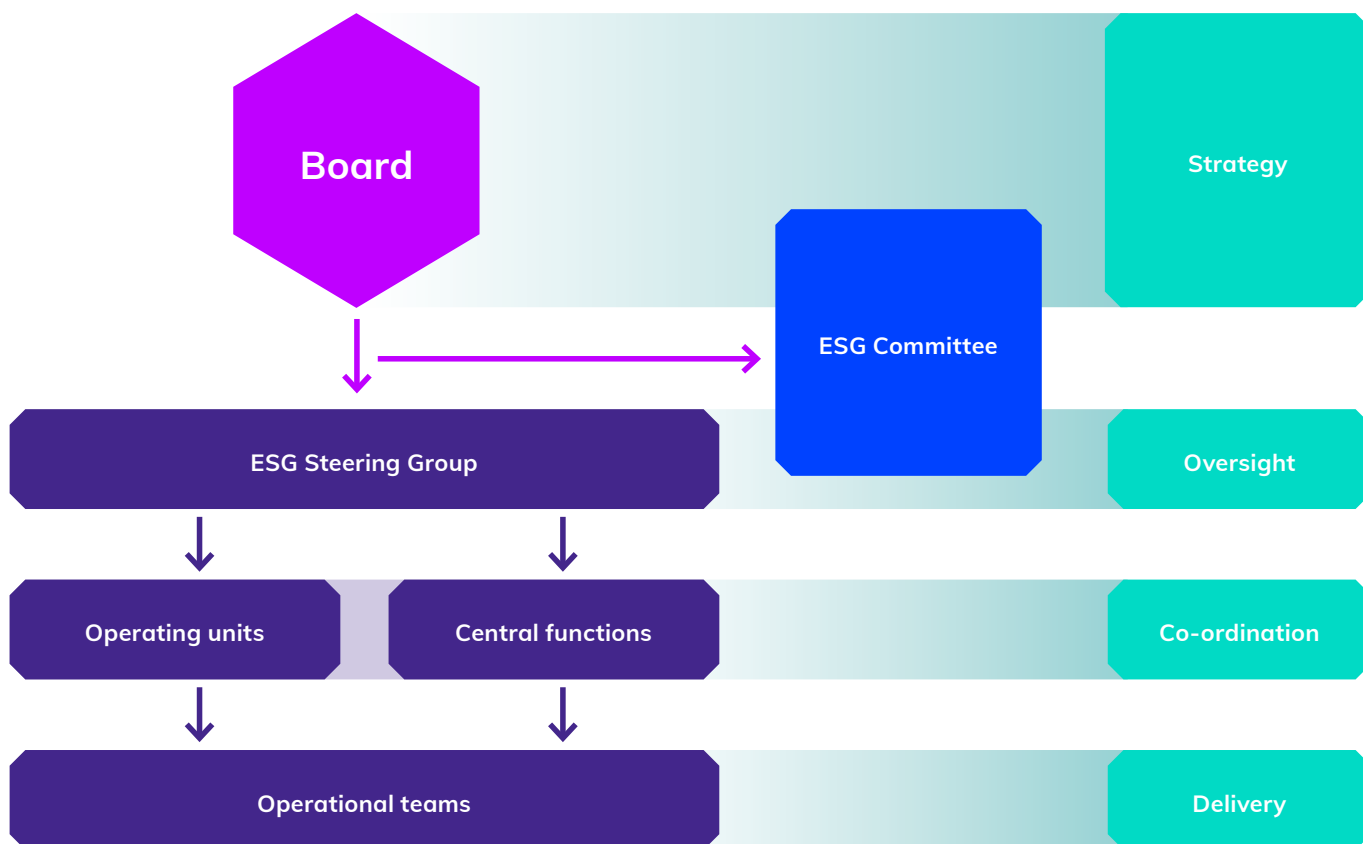
Our governance structure is now fully embedded and has proved effective in managing the increased scale, complexity, and expectations of the Group and its stakeholders. Our best-in-class governance programme is overseen by our Chief Governance Officer.

Overall governance and progress monitoring of our Modern Slavery work, for all markets and subsidiaries, sat with the Board's ESG Committee, which met six times during 2022.

In May 2023, Entain restructured its Board oversight of ESG issues to better manage the increasing workload of the prior ESG Committee and further embed sustainability across the Group. The new Sustainability and Compliance Committee guides the business on all aspects of ESG strategy, sets targets and monitors our performance, as the previous ESG Committee did⁶.

The new Committee continues to be supported by the ESG Steering Group, which meets monthly and consists of functional leaders from across the business, including Risk, Investor Relations, Human Resources, Corporate Affairs, Legal, Health, Safety & Security, Operations, and Communications. Convened by our Group Head of Sustainability and chaired by our Chief Governance Officer, the Group oversees the implementation of our sustainability strategy.

Our governance structure for Modern Slavery in 2022 is set out below. Further details on the new Sustainability and Compliance Committee will be provided in next year's statement.



⁶ Further detail on the new Sustainability and Compliance Committee is available in the Entain ESG Report 2022 available [here](#).

The cross-functional Modern Slavery Steering Group (formed in 2021) is now well established. Its members comprise senior leaders from across the business, including the Group General Counsel, Director of Internal Audit and Chief Risk Officer, to provide senior leadership and oversight, together with individuals from Procurement, the People Team, Company Secretariat, External Affairs, Legal and Regulatory, Retail and Internal Communications. Unseen also sits as a member of the Group. Its purpose is to create and oversee the stewardship, accountability and leadership of Entain's approach to Modern Slavery, providing counsel to the Executive Committee and Board and to advocate for the Modern Slavery and human rights strategy, ensuring high levels of engagement throughout the Group. The Group meets once a month and operates under formal Terms of Reference. In April 2022, these Terms were ratified by the Group's ESG Committee (meeting a commitment made in last year's statement).

Modern Slavery will continue to form an ongoing part of the audit cycle of the Group to ensure that the controls continue to work effectively and are assessed for opportunities to improve regularly.

Modern Slavery risk assessment and management have now been embedded within the existing Group risk management process. There is a Modern Slavery risk on each of the Ethics & Compliance and People Team's functional risk registers. This results in the risk being subject to regular review by the Group's Risk Committee and at least an annual discussion by the Committee on the mitigations and controls in place, demonstrating the importance that is placed on this process. The Group Risk Committee is answerable to the Audit Committee, a Board-level committee with responsibility and accountability for risk across the whole Group.

We have identified the two main areas of risk in our business as being: (1) the recruitment and onboarding of staff; and (2) our broader supply chain. We further recognise that certain countries we operate in have higher risks than others.

In late 2021/early 2022, the risk of Modern Slavery in Entain and our supply chains was subjected to an internal audit to provide an independent, objective review of our risk mitigation framework. The audit focused on (1) the adequacy of recruitment, employment management and payroll processes; (2) the adequacy and completeness of due diligence processes for third parties; (3) the inclusion of Modern Slavery in the risk management process; (4) the existence and effectiveness of key performance indicators ('KPIs') measuring performance in tackling Modern Slavery; and (5) efficiency and usage of training programmes about Modern Slavery.

The full output of the internal audit was reported to the Board and Audit Committee in February 2022 and shared with our external auditors. Following the audit, key improvements to the Modern Slavery framework have been made, including:

- making completion of the key training modules (including Modern Slavery) mandatory;
- revising the risk scoring assigned to Modern Slavery to align it with the Group risk management process;
- including appropriate Modern Slavery clauses in terms and conditions with affiliates, recruitment agencies and suppliers;
- requiring new suppliers to provide details of any investigations relating to possible bribery or corruption; and
- the introduction of a check of bank accounts from April 2022 at the stage of onboarding a new colleague to ensure that the bank account is not being used by multiple employees (which can be an indicator of Modern Slavery). Checks are carried out prior to the completion of each pay period. If a colleague wishes to change their bank account details, they are required to log on to Entain's secure, internal HR portal and submit their details. This information is received by our People team, to which details are checked and verified.

Modern Slavery risk assessment and management

Our workforce is 99% directly employed⁷, giving us visibility of recruitment and onboarding processes of the vast majority of our people. Our risk management approach within our supply chains continues to evolve with internal focus on continued improvement and visibility throughout (e.g., our tier 2 and 3 suppliers). We acknowledge that it is difficult to entirely remove any chance of Modern Slavery in any organisation; however, we will continue to drive improvements in our Modern Slavery risk mitigation programme.

Acquisitions due diligence

Entain is a business delivering sustainable and profitable growth. Our growth strategy ensures we will continue to broaden our reach, diversify our audiences, increase our scale and drive a strong sustainable performance across the Group, through both organic growth and mergers and acquisitions.

Due diligence in relation to Modern Slavery is generally included as part of the comprehensive due diligence that is carried out on target companies. When performing such diligence, we would seek details of compliance with the UK Modern Slavery Act or equivalent legislation preventing Modern Slavery and have developed this due diligence further in 2023. Entain announced five transactions in 2022 and no Modern Slavery concerns were identified in any of these transactions.

Supplier due diligence

We continue to drive for excellence, transparency and enhanced due diligence procedures within our supply chains that cover multiple areas. We recognise that we are on a journey to iteratively improve but are pleased to have built upon a number of foundations put in place in 2021 regarding supplier due diligence.

Following a detailed global bribery and corruption risk assessment carried out in 2021, we developed and launched the anti-bribery, corruption and tax evasion procedural framework ('Framework') in September 2022. We also launched alongside this Framework the anti-bribery, corruption and tax evasion due diligence procedure ('Procedure') in November 2022. These documents were developed with the assistance of outside counsel and summarise the policies, procedures and related controls which Entain has established in our business to support our zero-tolerance approach to bribery, corruption

and tax evasion. In particular, it sets out detailed procedures under which Entain conducts due diligence on, and mitigates the risks of working with, suppliers. This ensures coordinated action is taken throughout the Group. As noted above, corrupt behaviour can often be closely associated with other illegal behaviour, such as Modern Slavery, and so the implementation of this comprehensive framework helps to mitigate any associated Modern Slavery risks.

Any new supplier being onboarded into the Group using its supplier onboarding platform⁸ must agree to abide by our Modern Slavery Statement, our Code of Conduct and our Supplier Code of Conduct. 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 using a third-party due diligence tool to identify intelligence around risks such as corruption, human rights abuses or 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 Ethics & Compliance Team for resolution.

Throughout 2022, we continued our collaboration with Unseen to strengthen our procurement processes and policies. As committed to in last year's statement, Unseen helped Entain complete a risk assessment of our suppliers, mapping areas where Modern Slavery could be more prevalent based on factors such as purchasing category or political instability.

This enables us to rate suppliers from a Modern Slavery risk point of view as either high, medium or low risk. We intend to repeat this risk assessment every two years. During 2022, we have enhanced our framework in the following key areas:

- working with Unseen and using the results of their risk assessment, we launched the supplier Modern Slavery questionnaire for those suppliers deemed high risk (as committed to in last year's statement). There was a total of 43 questions and 18 suppliers were successfully assessed ranging in company size from less than 100 to over 1,000 employees. No instances of non-compliance were identified during the process. We proactively shared a suggested improvement with each supplier based upon their answers, so we can help to improve risk mitigation in relation to Modern Slavery across our supply chains;

⁷ Figure taken from the Entain 2022 Annual Report.

⁸ New acquisitions and a small number of legacy entities do not use this platform.

- asking suppliers to evidence where their goods and/or services are being procured from (i.e. our tier 2 and tier 3 suppliers) to assist with the assessment and mitigation of Modern Slavery risks before we enter into a contractual relationship with them;
- rolling out a new risk-based tool to comprehensively screen all suppliers for global sanctions, political exposed people, watchlists and adverse media, which is used to identify any Modern Slavery risks (or other legal or ethical risks) with a potential supplier; and
- signing an agreement at the end of 2022 to partner with a global, leading ESG rating and improvement solution (EcoVadis), the world's largest platform for supplier sustainability ratings, that will deepen our supplier due diligence. Our EcoVadis partnership will help us evaluate our key suppliers and their training needs across four topics – environment, labour and human rights, ethics and sustainable procurement. As part of this agreement, in 2023, we will require suppliers scoring as high risk based on their questionnaire responses to go through the EcoVadis platform to enable an audit of their ESG processes, policies and governance (including around Modern Slavery) and corrective action plans to be developed.⁹

We are also planning to do selective supplier physical site audits that will be researched and launched over the coming years.

We have used our partnership with Unseen along with resources from the Ethical Trade Initiative and Walk Free's Global Slavery Index to educate ourselves and to identify higher risk areas. We continue to use tools such as the Walk-Free Foundation's Country Check and Global Slavery Index for suppliers to pay particular attention to countries which are known to have a greater prevalence of Modern Slavery and to rate each supplier's level of risk in relation to Modern Slavery.

Recruitment and onboarding of staff and contract and freelance labour ('contractors')

Our UK Recruitment Policy sets out our aim to attract a diverse workforce of people who are passionate about what they do, reflect our values, and simply want to do their best. 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 always operate in a legal and ethical manner with our recruitment practices and ensure an individual's legal right to work within the given country is checked; appropriate references are received; and suitable identity documentation is available to the candidate (i.e. they have access to their passport or other similar legal documentation 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.

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.

⁹ For this risk assessment, we include suppliers with which we spend over £50,000 per year.

In 2021, we carried out a review of Right to Work checks to seek opportunities to make this even more robust and independent. As a result of the review, in 2022 we implemented a number of actions, including better ways to identify the early indication of expiry dates, tighter processes when working with colleagues to ensure the necessary documentation is up to date and implemented a biannual audit, which strengthens our compliance and enables us to be proactive in the prevention of issues. In addition, 2023 sees us identifying a single service provider who can support a fully streamlined process on a global scale.

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

- we do not use, 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 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 they are required to abide by the Supplier Code of Conduct. In the UK, we use a managed service provider, Guidant Global, to ensure consistent processing of our contractors. All contractors 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.

Training and communications

In 2021, we introduced for the first time a stand-alone, mandatory Modern Slavery online training module (previously forming a part of the Code of Conduct training) for colleagues to raise awareness of the issue, as well as providing them with the tools to spot and report potential Modern Slavery issues in their everyday lives.

The Modern Slavery training module was rolled out again in 2022, as part of ‘The Big Six’ mandatory training programme covering ethical topics such as safer gambling, data privacy and bribery. All modules were reviewed and updated by the Ethics & Compliance Team in 2022 based on the feedback from our colleagues and rolled out to Entain employees around the world. The training was translated into ten languages to ensure that we are educating our colleagues on the issue of Modern Slavery as effectively as possible and completed by over 21,000 colleagues.

In addition to the above training, specific groups who need an enhanced understanding of Modern Slavery are identified and these groups receive tailored, in-person training from Unseen. A total of 106 individuals from the Procurement, Internal Audit, Human Resources and Recruitment teams received this training (the training was delayed from December 2022 to early 2023). It goes into more detail on the importance and prevalence of the issue and how to spot and escalate any Modern Slavery concerns that may arise in their particular roles.

Measuring effectiveness of our Modern Slavery programme including KPIs and reporting

Entain is committed to ensuring the effectiveness of our Modern Slavery programme. We do this through the Modern Slavery Steering Group, our Modern Slavery risk register, our ongoing training and communications programme, our supplier due diligence procedure and our internal recruitment processes. These areas form part of Entain’s audit cycle to assess compliance.

In 2022, with the launch of The Big Six training modules, Entain committed to achieving a completion rate across the entire business for each module of 85%.

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 the Code of Conduct and the behaviours we expect of all our colleagues (and as committed to in last year's statement), 15% of the Group annual bonus scheme was based on meeting safer betting and gaming metrics, including the 85% completion rate for each Big Six training module, to help drive completion rates for our mandatory training.

We exceeded this target, achieving a final overall completion rate of 96%. The Modern Slavery module itself achieved a completion rate of 91%. This has also been reported in the ESG report, published in May 2023.

With the development of our Modern Slavery strategy (see below), we are aiming to develop further KPIs that we can use to effectively monitor our activities in this area and measure their impact.

Our future plans for continuous improvement in 2023 and beyond

In 2023, we are:

- refreshing our corporate values, with a continued focus on doing the right thing;
- developing a multi-year Modern Slavery strategy that we will publish externally to ensure our work in this area remains targeted and focused around awareness and guidance, supply chain management, recruitment, governance and ESG. This will also allow us to develop KPIs to report against this, increasing visibility and accountability;
- developing separate Modern Slavery and Human Rights Policies, to clarify expectations and standards and to ensure each area, although closely related, receives the attention and focus it deserves;
- carrying out an internal audit of our Modern Slavery programme and implementing any remedial actions identified as part of that audit;
- using our EcoVadis membership to evaluate our key suppliers in relation to the protection of labour and human rights;
- embedding a policy governance framework across the Group to ensure the highest levels of governance, clarity and consistency for all policies and aiming to introduce a new global platform for housing all policies across the Group to ensure they are easily accessible to all employees;

- updating our Code of Conduct to ensure it is a clear, comprehensive guide to the behaviours and standards we expect of all our employees. It continues to include a section on Modern Slavery, setting out what employees need to know and how to raise their concerns, maintaining the focus on this key issue;
- updating our mandatory training suite to reflect the new Code of Conduct, including Modern Slavery;
- continuing to include a safer betting and gaming metric (which includes completion of mandatory training on Modern Slavery) as part of the 2023 Group Bonus for all eligible employees;
- continuing to roll out regular communications on Modern Slavery and deliver targeted training to higher risk teams to maintain the required levels of awareness of the issue across the Group; and
- reviewing our anti-bribery, corruption and tax evasion Framework and Procedure to ensure they are fully embedded across the business and identifying any potential improvements to confirm we are only working with reputable suppliers who meet our high standards of integrity.

This statement has been approved by Entain's Board of Directors and each of its relevant subsidiaries in compliance with the UK Modern Slavery Act on 28 June 2023.



JM Barry Gibson
Chairman



Jette Nygaard-Andersen
Chief Executive Officer

Entain plc



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