

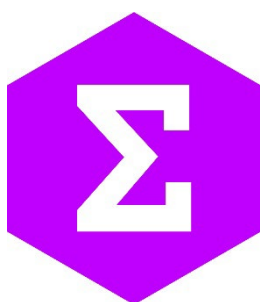


It's your game

**Modern Slavery and Human  
Trafficking Transparency  
Statement for Financial Year  
2023**

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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 subsidiaries<sup>1</sup> (hereafter ‘Entain’, the ‘Group’, the ‘Company’, ‘our’ or ‘we’).

The statement sets out the Group’s activities and measures taken between 1 January 2023 and 31 December 2023 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.

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<sup>1</sup> Relevant subsidiaries in scope of the UK Modern Slavery Act’s disclosure requirement and making this statement for the financial year 2023 are: Ladbrokes Betting & Gaming Limited and LC International Limited. A full list of subsidiaries within the Group can be found on pages 206-215 of the 2023 Annual Report.

## Introduction from Entain's Interim CEO

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

As a leading organisation in the betting and gaming sector, we operate in both regulated online and retail markets worldwide. Our platform enables us to grow our core business, explore new opportunities, and prioritise a customer-centric approach.

Our vision is to deliver the most entertaining customer experience supported by top-tier player protection. This vision is underpinned by our corporate values: doing what's right; keeping it simple; going beyond; and winning together.

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.

This statement outlines our efforts in 2023 and details how we will continue to enhance our approach to managing Modern Slavery risks. We aim to addressing modern slavery within our business and supply chains, demonstrating our commitment to human rights and contributing positively to the communities we serve and society at large.



**Stella David**

Interim Chief Executive Officer



## Summary of our key achievements in 2023

- Publishing our 2024-26 Modern Slavery Strategy, and associated key performance indicators (KPIs);
- implementing EcoVadis as part of our supply chain sustainability programme, resulting in 35% of our in-scope suppliers being assessed;
- updating our Code of Conduct and accompanying mandatory training materials, both including coverage of Modern Slavery, to ensure they are clear, comprehensive guides to the behaviours we expect of all our employees;
- embedding a policy governance framework across the Group to ensure the highest levels of governance and consistency, and making all Group-wide policies available on our People Hub; and
- including 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.

## 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 both online and in the retail sector. Listed on the FTSE 100 Index, the Group has operations in

over 30 regulated or regulating markets. We employ a workforce of around 31,000 colleagues across five continents.

The Group owns a comprehensive portfolio of over 30 leading brands. These include: 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.

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.

**Ladbrokes** **CORAL**  **BETMGM**

**Foxy**  
BINGO

**Gala**  
BINGO

**bwin**

 **BETCITY.NL**

**sportingbet**

**EUROBET** 

**STS**

**SuperSport**

**30+**

Leading brands

## Governance

Our dedicated Governance function comprises extensive legal, risk and compliance expertise and is 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 sits with the Board's Sustainability and Compliance Committee,

which met six times during 2023.

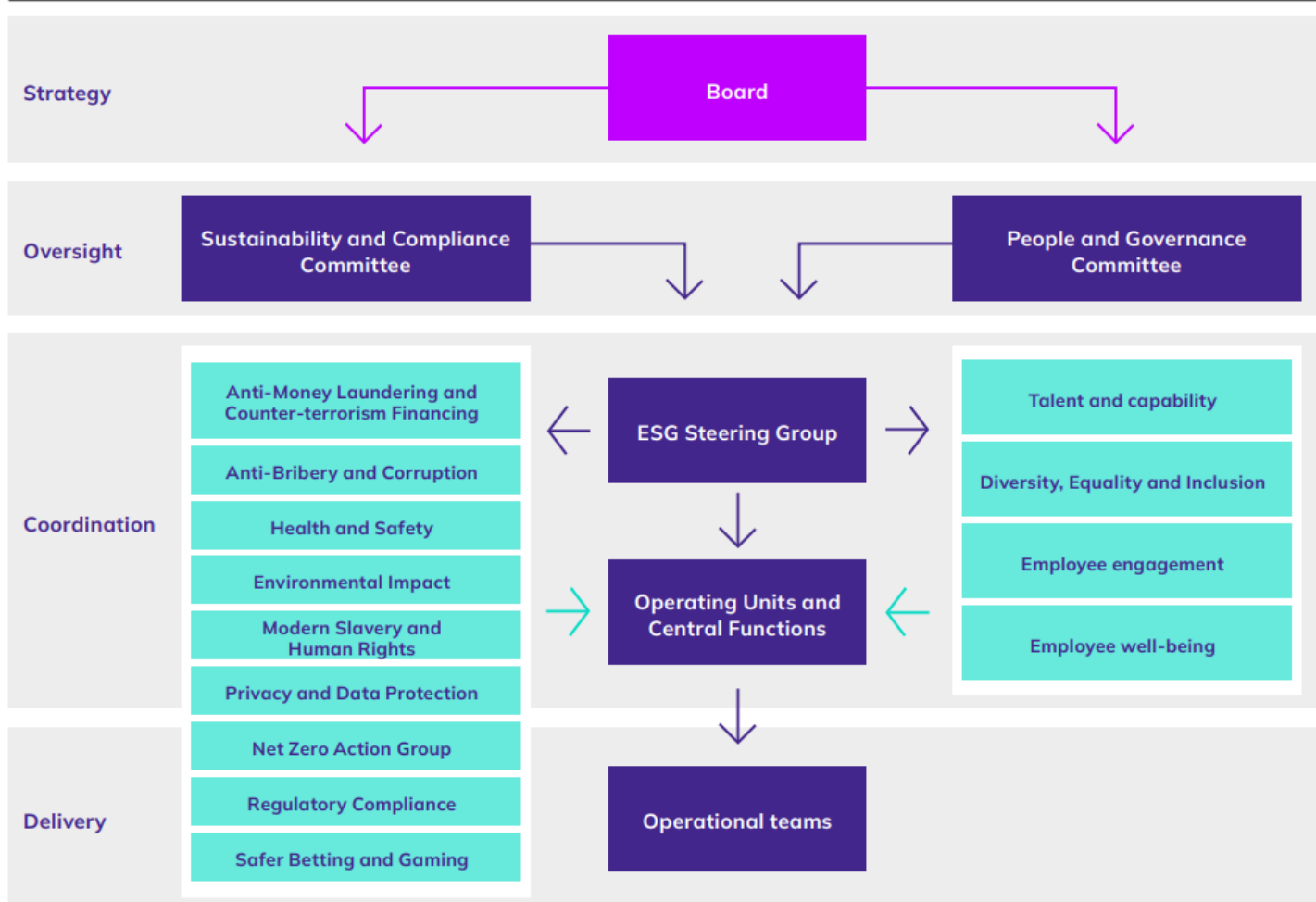
The Sustainability and Compliance Committee, established in 2022, is now fully embedded and operating effectively, with support from a monthly Environment, Social, and Governance (ESG) Steering Group. The ESG Steering Group oversees the implementation of our sustainability strategy and consists of functional leaders from across the business. Our ESG governance structure in 2023, which covers Modern Slavery and human rights, as well as other significant risk areas, is set out below.

The cross-functional Modern Slavery Steering Group (formed in 2021) comprises senior

leaders from across the business, including the Group General Counsel, the Group Ethics & Compliance Director, and the Chief Risk Officer. The Steering Group provides leadership and oversight of Modern Slavery related matters, including risk management. The Steering Group meets quarterly, with a subset of key members meeting in the months in between, as governed by a formal Terms of Reference.

Modern Slavery continues to form part of our internal audit cycle to ensure that the controls continue to work effectively and are regularly assessed for improvement opportunities. As part of this, internal audits were carried out in 2022 and 2023.

### ESG Governance Structure



## Collaboration on Modern Slavery

During 2023, we 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 public to raise concerns.



Unseen continued to advise on and support our progress on our journey of continuous improvement in addressing the risk of Modern Slavery within our business and supply chains. We continued to learn from their sector expertise to develop our own understanding of Modern Slavery.

In 2023, Unseen helped us develop our Modern Slavery Strategy, update our policy, and delivered tailored instructor-led Modern Slavery training to our high-risk teams.

## Modern Slavery Strategy

During 2023, we developed Entain's first Modern Slavery Strategy for 2024-26, which can be accessed [here](#). A summary of the Strategy is set out in the table to the right.

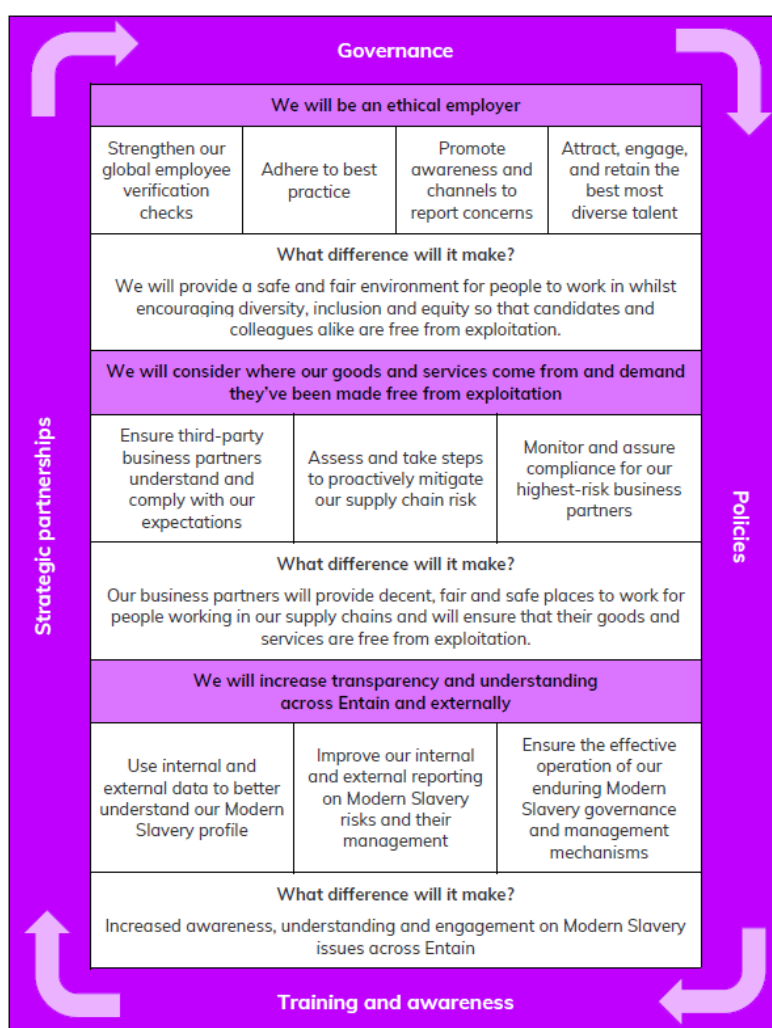
The Strategy was developed by our Modern Slavery Steering Group, with engagement from key stakeholders across the organisation. It was approved by the Sustainability and Compliance Committee, communicated internally, and made publicly available on our website in December 2023.

The Strategy focuses 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.

From 2024, we will provide progress updates against our strategy KPIs and targets within our Modern Slavery Statement.



## 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, which is available to all Entain colleagues, 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, all 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"> <li>Establishes our expectations for all employees and business partners who work for, or with, Entain.</li> <li>Available in 12 languages.</li> <li>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.</li> </ul>	January 2024	Yes
Human Rights & Modern Slavery Policy	<ul style="list-style-type: none"> <li>Sets out our commitment to human rights and to preventing Modern Slavery, including our recognition and support of: <ul style="list-style-type: none"> <li>the International Bill of Human Rights;</li> <li>the core labour standards as detailed in the International Labour Organisation's human rights conventions;</li> <li>the United Nations ('UN') Guiding Principles on Business and Human Rights ('UNGPs');</li> <li>the human rights chapter of the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises; and</li> <li>the Ethical Trade Initiative's Base Code.</li> </ul> </li> <li>Supported by extensive guidance on Modern Slavery warning signs and how to raise concerns.</li> </ul>	January 2024	Yes
Anti-bribery & Corruption Policy	<ul style="list-style-type: none"> <li>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.</li> <li>Bribery and corruption are often closely associated with other illegal activities, including Modern Slavery.</li> </ul>	November 2023	Yes
Procurement Policy	<ul style="list-style-type: none"> <li>Ensures minimum standards for procurement activities are applied and specifies that appropriate due diligence and risk management is done.</li> <li>Requires all suppliers to comply with and adhere to all applicable international labour laws in accordance with the principles of the International Labour</li> </ul>	March 2024	No



Policy	Summary	Last reviewed	Publicly available
	Organisation, UN Global Impact and the UN Declaration of Human Rights.		
No Purchase Order, No Pay Policy	<ul style="list-style-type: none"> <li>Ensures all suppliers are subject to due diligence to identify, assess and mitigate risks, including Modern Slavery.</li> </ul>	February 2023	No
Supplier Code of Conduct	<ul style="list-style-type: none"> <li>Sets out the social, ethical, and environmental standards that Entain expects from all our suppliers, aligned to the UN Sustainable Development Goals.</li> <li>New suppliers must agree to adhere to the Code's principles, including compliance with all applicable human rights and employment laws.</li> </ul>	March 2024	Yes
Speak Out Policy (whistleblowing)	<ul style="list-style-type: none"> <li>Facilitates and encourages people to speak out about any behaviour that might be illegal, unethical or that breaches our Code of Conduct.</li> </ul>	December 2023	Yes
Grievance Policy	<ul style="list-style-type: none"> <li>Colleagues can use the grievance procedure if they feel there are work-related issues they wish to raise, which may include issues around working conditions.</li> <li>Matters are investigated and addressed as appropriate, in line with best practice and policy.</li> </ul>	December 2023	No

## Communicating and embedding Entain Policies

Communicating our Code of Conduct and other key policies to new joiners forms part of our onboarding programme. All new joiners receive access to these policies via our People Hub.

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 2023 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.

## 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 2023.

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 that can be reported. 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 and in 18 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 2023, 65 Speak Out reports in total were received and investigated (compared to 51 in 2022). 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. 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, along with an opportunity to discuss environmental factors 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 embedded within the existing Group enterprise risk management processes. Modern Slavery risks are recorded and assessed on the Ethics & Compliance, Procurement, and People Team's functional risk registers, and undergo a deep dive by the Group Risk Committee as part of the Group principal risk, 'Laws, Regulations, Licensing and Regulatory 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 both the Audit and Sustainability and Compliance Committees. The Group Risk Committee meets bi-monthly, and its members include senior leadership including the CEO, the Chief

Financial Officer, and the Group General Counsel.

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.

## 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 99% 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 immoral, 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 2023, we started a thorough review of our existing local recruitment policies and began to consolidate 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, we have begun a comprehensive process to procure a single provider 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. This is being rolled out across the Group over the next 12-18 months, beginning with the UK and Philippines in Q2 2024.

To accompany the above, a new policy will support the refreshed approach to pre-employment screening. A new global Applicant Tracking System is also being implemented, 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.

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 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

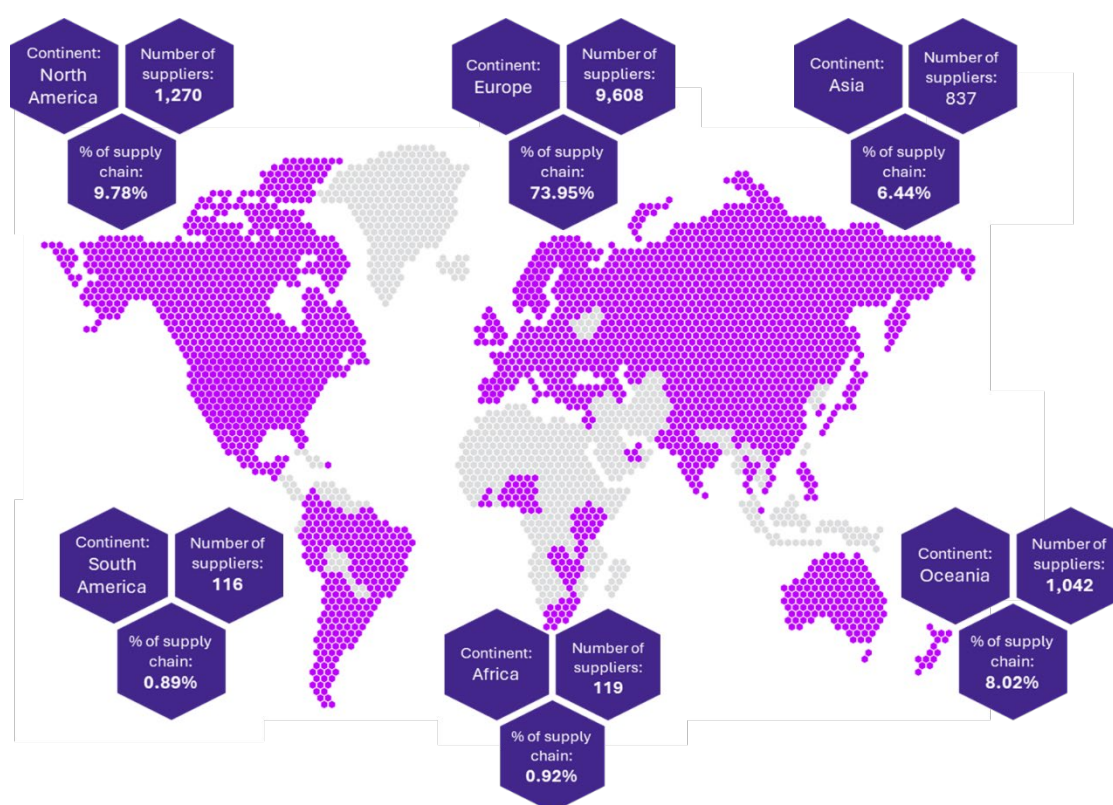
- welcome to take up opportunities directly with Entain should they wish to.

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. We strive to protect our customers by investing into research, education, and treatment initiatives, and have implemented ARC™ (Advanced Responsibility and Care™) to take a technology-led intelligent approach to risk reduction. You can find out more about our approaches to safer gambling [here](#).

## Supply chain

We source goods and services from more than 12,000 tier 1 suppliers, spending more than £2.6bn across more than 80 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 the 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, 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:

- marketing (partnerships, digital & social media, sponsorships, PR & events, etc);
- content (data streaming, retail broadcasting, gaming, 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).

Based on the results of our first Modern Slavery supply risk assessment in 2022, Modern Slavery risk can 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 are committed to updating this risk assessment every two years, and work has started to update the risk assessment in 2024.

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

<sup>2</sup> 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.

## Due diligence

We continue to drive 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 (finalised at the end of 2022) is now fully embedded and operationalised through supporting policies and procedures, which support our zero-tolerance approach to bribery, corruption, and tax evasion. The Framework 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 Group<sup>2</sup> 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 also 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 Ethics & Compliance for investigation, assessment, and remediation (if appropriate).

To help govern the handling of such concerns, we have developed and implemented a Global Investigations Policy. The Policy helps ensure 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.

During 2023, we have enhanced our due diligence framework by asking suppliers to evidence where their goods and/or services are being procured from (i.e. our tier 2 and tier 3 suppliers) through our Request for Proposal ('RFP') tender documentation.

In early 2023, we took an important step by partnering with EcoVadis, the world's largest platform for supplier sustainability ratings. Embedding EcoVadis will help us evaluate our 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 targeted and invited incumbent in-scope suppliers to go through the assessment process to enable a desktop audit of their ESG processes, policies and governance (including Modern Slavery). In-scope suppliers were identified by looking at supplier spend, contractual relationship and ESG risk.

This resulted in assessing 35% of our in-scope suppliers, representing £523m of supply chain spend. So far, we found that our suppliers scored on average 59.6 out of 100 on the EcoVadis network – that is 13.6% higher than the EcoVadis benchmark.

Post-assessment, corrective action plans (where necessary) will be communicated through the EcoVadis platform, and include amongst other things, recommendations to publish a Modern Slavery Policy. This is part of our general engagement and capability building efforts with suppliers. To support suppliers, EcoVadis provides e-learning

material (including related to Modern Slavery) that is freely available for any supplier who goes through the platform. In 2024, we are going further by targeting more incumbent suppliers on a risk-prioritised basis, embedding the assessment into our RFP tender documentation and encouraging winning RFP tender suppliers to go through the assessment with its associated wider sustainability benefits.

We are also planning to do risk-based human rights and Modern Slavery supplier site audits as set out in our supply chain strategy. We see this as essential for an effective Modern Slavery programme. The exact methodology and operationalisation of these site audits form part of our Modern Slavery Strategy and will be researched, finalised and launched by the end of 2025.

## Acquisitions due diligence

Entain aims to deliver sustainable and profitable growth. Our growth strategy focuses primarily 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. Entain announced five transactions in 2023 and no Modern Slavery concerns were identified in any of these transactions. Implementation by newly acquired entities of our policies and processes governing Modern Slavery risk management, including mandatory training on Modern Slavery, forms part of our minimum integration requirements, making their implementation mandatory and subject to Group oversight.

## Training and communications

In 2023, 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 12 languages to ensure that we are educating our colleagues

on the issue of Modern Slavery as effectively as possible and completed by over 23,000 colleagues.

In addition to the above training, we annually assess and identify higher-risk teams who need an enhanced understanding of Modern Slavery. During 2023, these teams were provided tailored training by Unseen. A total of 205 individuals from the Governance, Procurement, Internal Audit, People, Recruitment and Facilities teams received this training in 2023. The enhanced Modern Slavery training explores the risks, their impacts, and how to identify and mitigate issues relevant to specific roles.

In 2023, with the launch of the Big4 training modules, Entain committed to achieving a completion rate of 85% across the entire business. 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), 15% of the Group annual bonus scheme was based on meeting safer betting and gaming metrics, including the 85% completion rate metric, to help drive completion rates for our mandatory training.

We exceeded this target, achieving a final overall completion rate of 97%. The module which included the Modern Slavery content achieved a completion rate of 95%.

## 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 across the three lines of defence.

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

With the development of our Modern Slavery Strategy, we are implementing KPIs that we can use to effectively monitor our activities in this area and measure their impact.

## Looking ahead

In 2024, we will:

- conduct a supply chain assessment with external subject matter expertise support and begin to send out detailed Modern Slavery questionnaires to higher-risk suppliers;
- develop Modern Slavery learning material as part of a supplier toolkit; and
- implement, operationalise, and monitor elements of Entain's Modern Slavery Strategy 2024-26, including:
  - strengthening our global employee verification checks, framework and methodology;
  - improving the processes for ensuring suppliers are complying with our expectations; and
  - continuing to improve how we raise Modern Slavery awareness both internally and with our business partners.

This statement was approved by Entain's Board of Directors in compliance with the UK Modern Slavery Act on 27 June 2024.

