

The Entain logo is displayed in a stylized purple font. The background of the slide features a dark purple field with a fine grid of small dots on the left, and a black field with scattered playing cards on the right. The cards include various suits and values, such as the Ace of Hearts, 10 of Spades, and 4 of Clubs.

Entain

MODERN SLAVERY AND HUMAN TRAFFICKING TRANSPARENCY STATEMENT FINANCIAL YEAR 2025



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INTRODUCTION FROM OUR 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 global sports betting and gaming company, we operate in regulated and regulating online and retail markets to deliver entertaining customer experiences. This is underpinned by our corporate values: doing what's right; keeping it simple; going beyond; and winning together.

More than ever, customers expect companies to operate in an ethical way. Operating responsibly is central to how we run our business and we aim to meet high 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.

We continue to uphold our obligations for human rights issues and are working with colleagues, supply chains and relevant partners to ensure we continue to identify risk, carry out appropriate due diligence and take any necessary actions. This statement outlines our efforts in 2025 and details how we will continue to enhance our approach to managing Modern Slavery risks.

Stella David
CEO





OUR BUSINESS

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.

Business Model



Entain plc is one of the world's largest sports-betting and gaming groups, operating exclusively in regulated and regulating online and retail betting and gaming markets.

Listed on the FTSE 100 Index, the Group has a global presence with operations in over 30 markets. We employ a workforce of around 30,000 colleagues across Europe, the Americas and APAC.

Additional information about our organisation can be found in our [Annual Report](#).

Ladbrokes

CORAL

 **BETMGM**

Foxy
BINGO

Gala
BINGO

bwin

 **NINJA**
CASINO

sportingbet

EUROBET

STS

SuperSport

35+
leading brands

With more than 35 leading brands, each tailored to the expectations of local customers, local markets and local regulators, we have a global presence and hold podium positions in the world's largest regulated markets.



GOVERNANCE

Entain's approach to preventing modern slavery and upholding human rights is embedded within our broader ethics, sustainability and risk management framework.

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Overall accountability for Entain's modern slavery programme, including this Statement and related risk assessments, sits with the Executive Committee (ExCo), chaired by the CEO, with ultimate oversight provided by the Board through the Sustainability & Compliance Committee.

Day-to-day governance and operational oversight is supported by a cross-functional Modern Slavery Steering Group, comprising senior representatives from key parts of the business, including the Ethics, Procurement, People, Legal, Risk and Compliance teams, who are all key stakeholders in our programme. This Group meets quarterly to oversee risk management and delivery of commitments across operations and the supply chain.

Our approach to modern slavery is integrated within Entain's wider sustainability strategy, with key updates provided to the Sustainability & Compliance Committee.

Supporting this is our [Human Rights and Modern Slavery Policy](#), alongside a suite of Group-wide policies that support modern slavery and human rights. These are approved under our policy governance framework at a senior level and regularly reviewed. Together, these elements enable strong accountability, effective oversight and continuous improvement across Entain's programme.

For further information on our Governance approach please refer to our [Annual Report](#).



POLICIES

As part of our system of internal controls, we maintain a hierarchy of policies and procedures that underpin our commitment to preventing modern slavery and human trafficking across our business and supply chains. Policies are supported by more detailed guidance or procedural documents to help with interpretation and implementation.

Our policies are centrally hosted on our People Hub, ensuring they are available and accessible by our global workforce.

Selected Tier 1 (Group-wide) policies are publicly available and, where appropriate, translated into multiple languages to reflect our international footprint. These are complemented by Tier 2 policies tailored to specific jurisdictions or functions, ensuring alignment with local legal and regulatory requirements.

Our policies are informed by our commitment to respect internationally recognised human rights. In recognition of the evolving legislative landscape, including developments in modern slavery and employment law, our policies are subject to regular review and updating. As part of our policy governance framework, policies are reviewed formally at least every two years, or more frequently where required, for example due to legislative or operational changes.

Policy	Summary	Last reviewed	Publicly available
Our Code Tier 1	- Sets minimum standards for conduct aligned with laws, industry standards, and stakeholder expectations; applies to all Entain employees and business partners. - 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. - Speak Out (whistleblowing) has a dedicated area with key information on how to report any breaches of Our Code, how those reports are investigated, alongside our commitment to zero-retaliation. - Available in 13 languages.	April 2026	Yes
Group Human Rights and Modern Slavery Policy Tier 1	- States our commitment to respecting internationally recognised human rights and modern slavery standards in line with: - the International Bill of Human Rights - the core labour standards as detailed in the International Labour Organisation's human rights conventions - the UN Guiding Principles on Business and Human Rights - the human rights chapter of the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises - the Ethical Trade Initiative's Base Code. - Available in 12 languages	May 2026	Yes

Σ POLICIES (CONTINUED)

Policy	Summary	Last reviewed	Publicly available
Supplier Code of Conduct Tier 1	- Sets out the social, ethical, and environmental standards that Entain expects from all our suppliers, aligned to the UN Sustainable Development Goals. - New suppliers must agree to adhere to the Code's principles, including compliance with all applicable human rights and employment laws at onboarding.	April 2026	Yes
Group Speak Out Policy (Whistleblowing) Tier 1	- Facilitates and encourages people to speak out about any behaviour that might be illegal, unethical or that breaches Our Code, including modern slavery. - Details of our Speak Out helpline are shared with suppliers in our Supplier Code of Conduct. - Available in 21 languages	March 2026	Yes
Group Anti-Bribery & Corruption Policy Tier 1	- 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. - Bribery and corruption are often closely associated with other illegal activities, including modern slavery. - Available in 11 languages	April 2026	Yes
Group Anti-Tax Evasion Policy Tier 1	- Sets out our zero-tolerance approach to tax evasion and its facilitation, to reduce the risk of tax evasion across our business and supply chains and ensure no concealment of illegal labour practices. - Available in 9 languages	February 2026	Yes
Group Procurement Policy Tier 1	- Ensures minimum standards for procurement activities are applied across the Group and specifies that appropriate supplier due diligence and risk management is performed. - Requires all suppliers to comply with and adhere to all applicable international labour laws in accordance with the principles of the International Labour Organisation, UN Global Impact and the UN Declaration of Human Rights.	April 2026	No

Σ POLICIES (CONTINUED)

Policy	Summary	Last reviewed	Publicly available
Group No PO No Pay Policy Tier 1	Ensures all suppliers are subject to due diligence to identify, assess and mitigate risks, including modern slavery.	June 2025	No
Group Resourcing Policy Tier 1	Sets out the responsibilities for responsible and ethical recruitment practices to prevent modern slavery risks, including prohibiting worker-paid recruitment fees and ensuring all workers are hired voluntarily with transparent, fair employment terms.	September 2025	No
Global Investigations Policy Tier 1	The Global Investigations Policy governs the handling of reported concerns and ensures that investigations are objective and conducted in a consistent manner, in accordance with the highest standards of integrity, impartiality, accuracy, and fairness, in line always with our legal and regulatory obligations.	August 2023	No
Local Grievance Policies Tier 2	- Colleagues can use their local grievance procedure if they feel there are work-related issues they wish to raise, which may include issues around working conditions. - Matters are investigated and addressed as appropriate, in line with best practice and policy.	Various	No

Communicating and Embedding Entain Policies

Communicating Our Code and policies to new employees forms part of our onboarding programme. Our Code and key policies are also supported by a robust and effective annual training programme, which includes modern slavery. As part of this mandatory training, employees have to confirm that they will follow the principles set out in Our Code. New employees receive this training as part of their induction programme.

New and updated policies 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. Our Ethics Champions League, made up of representatives from across the Group, disseminate ethics and compliance messages, including new or updated policies, at the local level.

▶ BEST PRACTICE

Breaches of Our Code

Entain takes breaches of our Code, policies, and procedures very seriously and investigates allegations as appropriate. Substantiated allegations 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 breaches of the Supplier Code of Conduct around modern slavery were received during 2025.

We recognise that suppliers who have failed to meet our required standards relating to modern slavery will often have done so by mistake or due to extenuating circumstances, 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

Our [Speak Out Policy](#) specifically lists modern slavery issues as examples of what can be reported under the policy. It confirms that reports can be made by or in relation to third-party suppliers.

Concerns can be raised to a line manager, the People team, Entain's secure, confidential whistleblowing mailbox or our independent hotline or web/mobile reporting portal (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. This service is available all year round, 24 hours a day in 21 languages.

All reports of misconduct or potential misconduct raised through our Speak Out channels are referred to the Audit & Risk Committee, which has delegated the conduct of investigations to Internal Audit on its behalf.

Investigations are undertaken discreetly and confidentially. Our team will not provide detailed updates to reporters during the investigation, but will usually share the outcome. These outcomes are also communicated to the Audit & Risk Committee and relevant Board Directors, to ensure sufficient oversight of the process.

Any reports received relating to modern slavery would be investigated internally and reported externally to the appropriate authorities. In 2025, 166 Speak Out reports in total were received and investigated (compared to 125 in 2024). None of these related to modern slavery or human rights issues.

Scan the QR code to access the Speak Out Platform.



BEST PRACTICE

Our Values

Our Values guide every decision we make and action we take. They are vital to our culture and are at the heart of how we work together, serve our customers and measure our success. They play a central role in preventing modern slavery and protecting human rights by embedding ethical behaviour into everyday decision-making.

The value of “Do What’s Right” promotes integrity, accountability and speaking up, ensuring concerns about exploitation or abuse are raised and addressed.

The value of “Win Together” reinforces respect, inclusion and fair treatment of all individuals, supporting a culture where dignity and equality are non-negotiable.

These Values are backed by robust supplier and employee due diligence, responsible supplier relationships and a clear commitment to never engage with forced labour, human trafficking or child labour, ensuring that both Entain and its partners actively identify, prevent and respond to human rights risks across operations and supply chains



Do What's Right

We put our customers first and lead the way in protecting our players. Doing the right thing also means creating a workplace where everyone can be themselves and act with integrity. When something doesn't feel right, we speak up. It's how we stay honest, accountable and trusted.



Go Beyond

We stay curious and open to new ideas. We learn from what works and what doesn't, and we use those insights to push forward. We surround ourselves with great people and put in the effort needed to turn plans into reality. Progress comes from embracing change – and we're here for it.



Keep it Simple

We make things easy – for customers and for each other. That means clear goals, clear accountability and removing complexity wherever it slows us down. When we keep things simple, we perform better, move faster and stay focused on what matters.



Win Together

We share a vision for Entain and know we're stronger when we work as one team. We collaborate, break down barriers and treat each other with respect. We celebrate success – big or small – because when our teammates win, we all move forward.

Other Best Practice

We have five Employee Forums across a number of our locations. Employee Forums provide a platform for a two-way dialogue between employees and leaders, covering a range of topics. In addition to these Forums, employee listening and feedback sessions are held on a regular basis to facilitate the discussion of specific topics that may not otherwise be covered by Employee Forums, providing another channel in which our people can escalate issues or raise concerns.

An annual Global Engagement Conference is held, with representatives from the majority of our locations and members of the Board. It enables meaningful dialogue regarding the company and our ways of working.

Your Voice, our annual people engagement survey, also give employees a chance to voice their opinions and give feedback.

We consider our employee wellbeing programme as vitally important to create a safe and secure environment for all our people, where their human rights are respected.



RISK ASSESSMENT & MANAGEMENT

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Human rights and modern slavery risk assessment and management are incorporated within our wider risk management processes.

Modern slavery risks are recorded and assessed on the Ethics, Procurement, and People teams' functional risk dashboards and associated risk registers, which undergo a regular risk 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 the Audit & Risk Committee, Sustainability & Compliance Committee and the People & Governance Committee. The Group Risk Committee convened five times during 2025, and its membership includes the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer and the Group General Counsel and Chief Customer Care Officer.

We have identified the two main areas of risk in our business:

People & Recruitment



Supply Chain



We recognise that certain countries that we operate in have higher modern slavery risks than others. We also recognise that some of our customers may be at risk of exploitation if they build up significant gambling debts.



RISK ASSESSMENT & MANAGEMENT

People & 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 98% 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 unethical 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).

Taking this further, in 2025 we continued our global roll out with a single business partner 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. These checks began in Q3 2024, with the aim of being completed and rolled out to 100% of locations by the end of 2026.

In addition to our core checks for new hires, across 85% of our global estate, we conduct monthly reviews of employee address data. This helps identify instances where multiple individuals may be living at the same address, which can be a potential indicator of Modern Slavery.

If identified, further investigation is carried out by our People Compliance team to ensure there are no modern slavery concerns. There were no instances identified during 2025.

Work has been taking place to design a corporate learning programme to support our hiring manager population called 'Licence to Hire'.

The course is designed to build confidence, capability, and consistency across our hiring population ensuring best practice and aligns with Entain's values and legal commitments, including those relating to modern slavery and being a responsible employer.



RISK ASSESSMENT & MANAGEMENT

People & Recruitment (continued)

A new global Recruitment Platform was implemented during 2024, 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. There were no instances identified during 2025.

Key elements of our existing recruitment processes that mitigate against the risk of modern slavery include:

- we do not charge 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 UK agencies we do business with are subject to the supplier due diligence process (where our agreement is not directly with the individual providing the contract or freelance labour) and are required to abide by our Supplier Code of Conduct. In the UK, we use a managed service provider, to ensure consistent processing of our contractors.

All contractors within the UK 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, in accordance with national law and their contract/assignment details; and
- welcome to take up opportunities directly with Entain should they wish to.

We recognise and comply with a number of the indices within the Responsible Recruitment Toolkit including:

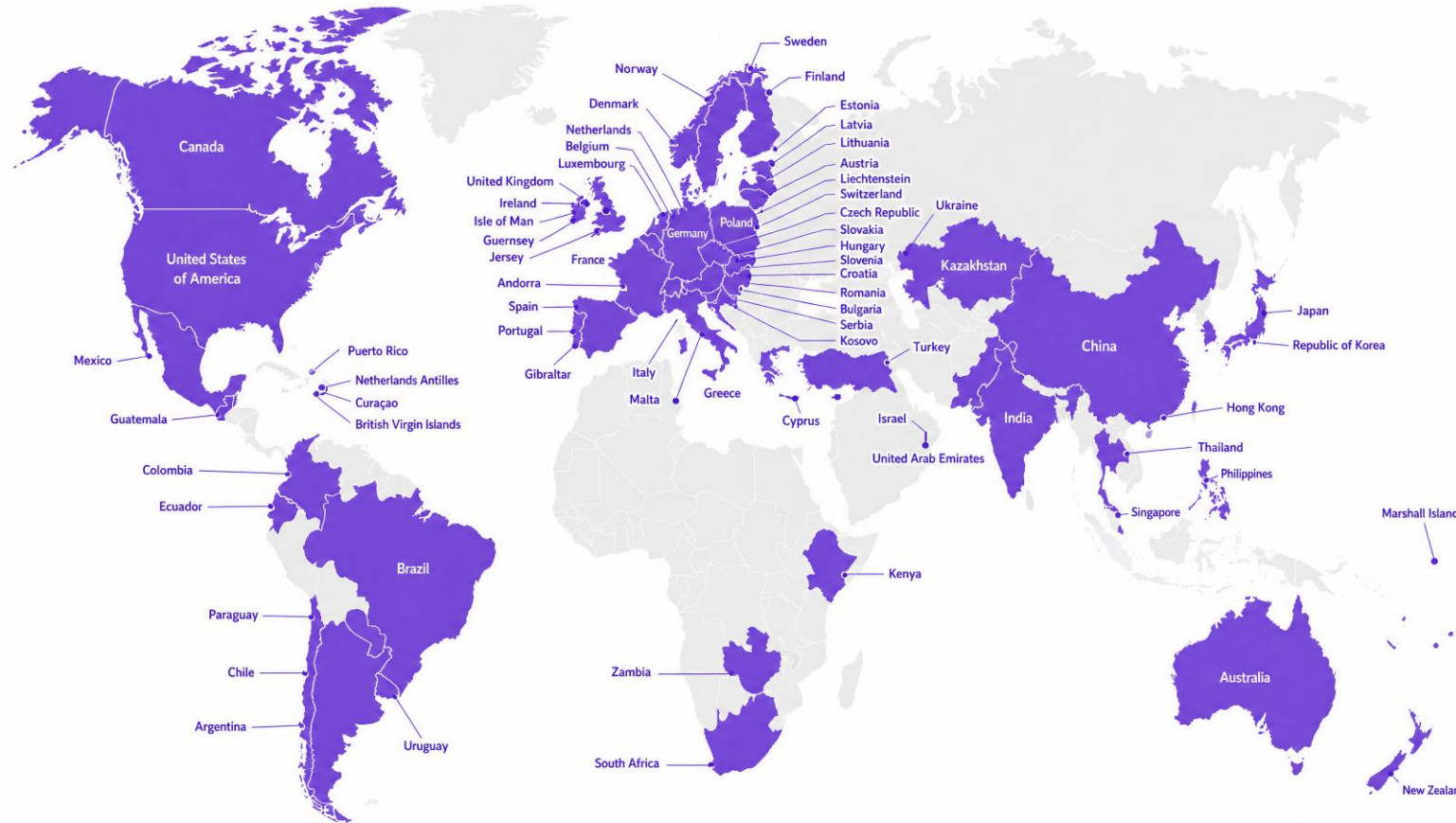
- we have a business structure, business model and governance compatible with operating legally, ethically and sustainably;
- we do not use child labour or forced or compulsory labour, and opportunity and treatment is fair and equal, as set out in our policies;
- legal eligibility to work is established;
- 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 application of procedures are consistent and controlled; 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.



RISK ASSESSMENT & MANAGEMENT

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Supply Chain



We source goods and services from more than 13,000 Tier 1 suppliers, spending more than £3 billion across more than 70 countries – as presented by the 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 our supply chain represents one of Entain's biggest potential exposures to modern slavery.

Due to the nature of goods and services the Group procures, which are predominantly indirect and assessed as lower risk in the context of modern slavery, comprehensive Tier 2 supplier mapping has not yet been undertaken. The Group has prioritised strengthening controls and visibility at Tier 1, where it has the most direct influence and oversight. While this approach reflects a risk-based and proportionate allocation of resources, the Group recognises that deeper supply chain tiers may still present exposure. As part of its ongoing enhancement of third-party risk management (TPRM) and strategic supplier engagement, the Group intends to progressively improve transparency beyond Tier 1, including exploring targeted Tier 2 mapping where appropriate.

Continent	No. of suppliers	% of supply chain
North America	1,259	9.46%
South America	143	1.07%
Europe	8,789	66.05%
Africa	27	0.20%
Oceania	2,023	15.20%
Asia	1,065	8.00%



RISK ASSESSMENT & MANAGEMENT

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Supply Chain (continued)

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 and India) to allow them to support the global business whilst also 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, HR services, audit, insurance, benefits, etc);
- IT (infrastructure, cyber security, end-user services, etc); and
- property and retail operations (facilities, logistics, security, consumables, etc).

During 2025, we further strengthened our modern slavery framework through two key initiatives.

Firstly, in line with our Modern Slavery Strategy, we finalised our methodology for supplier site audits, which will be piloted in 2026. This represents a progression from our existing supplier due diligence approach, moving beyond desk-based risk assessments and questionnaires towards more direct, on-the-ground engagement as our programme continues to mature.

Secondly, as part of a Group-wide enterprise initiative, we are implementing (in a multi-year phased approach) a TPRM platform to support the onboarding and ongoing monitoring of suppliers. This enhances and consolidates the digitalisation of our supply chain due diligence, providing a more robust and auditable single source-of-truth. The platform enables a more risk-focused approach across key areas, including sustainability (covering modern slavery and human rights), ethics and data security, and strengthens our ability to leverage technology and data to improve the effectiveness and efficiency of risk management.

As a minimum requirement, all new suppliers engaged by the Group* are required to adhere to the principles set out in Entain's Code of Conduct and Supplier Code of Conduct, both of which outline our expectations in relation to modern slavery. Suppliers are also required to disclose any involvement in regulatory investigations or enquiries relating to bribery or corruption.

**rollout in Poland, Croatia, Georgia, Israel, Italy and Belgium to be phased during 2026/2027 alongside the Group TPRM project.*

This forms a key part of embedding modern slavery considerations within our core business processes. Through our multi-phased TPRM approach across the Group, suppliers are subject to risk screening at onboarding and ongoing monitoring thereafter. Supplier due diligence is either covered through the new TPRM platform or our previously enabled risk screening platform with both providing continuous intelligence across a range of risk areas, including corruption, human rights abuses and environmental concerns.



RISK ASSESSMENT & MANAGEMENT

Supply Chain (continued)

We continue to strive 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.

We recognise that the way we purchase goods and/or services can either support or undermine a supplier. Failure to pay supplier invoices on time can lead to an increased risk of modern slavery. We therefore strive to ensure the timely payment of suppliers in line with the terms of our Procurement Policy.

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 (which is periodically reviewed and updated) sets out all elements of our control framework for bribery, corruption and tax evasion risks, governing activities such as policies, training, risk assessments, gifts and hospitality and lobbying, which support our zero-tolerance approach to bribery, corruption, and tax evasion (and its facilitation).

The Framework also sets out detailed requirements defining how Entain conducts third-party due diligence. This ensures coordinated and consistent action is taken throughout the Group.

Entain has not to date had any modern slavery concerns raised via due diligence screening but if a concern were to be flagged, this would be escalated to the Group Ethics team for investigation, assessment, and remediation (if appropriate) in line with the Global Investigations Policy.

We continue to utilise one of the world's largest platforms for supplier sustainability ratings, EcoVadis. This remains an important step in our supply chain offering as we seek to drive supplier performance improvements.

We are encouraged that 96% of our EcoVadis assessed suppliers have a labour and human rights policy on preventing discrimination and harassment.

As part of EcoVadis' four assessment topics (environment, labour and human rights, ethics and sustainable procurement), where necessary, we communicate corrective action plans including modern slavery actions via the platform. This is part of our general engagement and capability building efforts with our suppliers that go above and beyond ongoing contractual management.

As an added benefit, the platform also provides eLearning (including related to modern slavery) and webinars that are freely available for any supplier that goes through the platform. This is communicated through our supplier sustainability training material.



RISK ASSESSMENT & MANAGEMENT

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Acquisitions Due Diligence

Entain aims to deliver sustainable and profitable growth. Our growth strategy focuses primarily on organic growth and, albeit less frequently than in recent years, where appropriate, through targeted mergers and acquisitions (M&A).

Modern slavery risk forms part of our comprehensive M&A due diligence process. Ongoing modern slavery risk management forms a key part of our mandatory integration requirements. These include mandatory training on modern slavery for the acquired business and the adoption of Entain's Our Code and key policies, including our [Human Rights and Modern Slavery Policy](#).



MODERN SLAVERY STRATEGY

During 2023, we developed Entain's first [Modern Slavery Strategy](#), which covers 2024 to 2026. It sets out where we are today, where we want to get to, and how we plan to get there.

[The Strategy](#) was developed by our Modern Slavery Steering Group and approved by the Sustainability and Compliance Committee, communicated internally, and made publicly available on our website in December 2023.

[The Strategy](#) focuses on three key priorities on how we will:

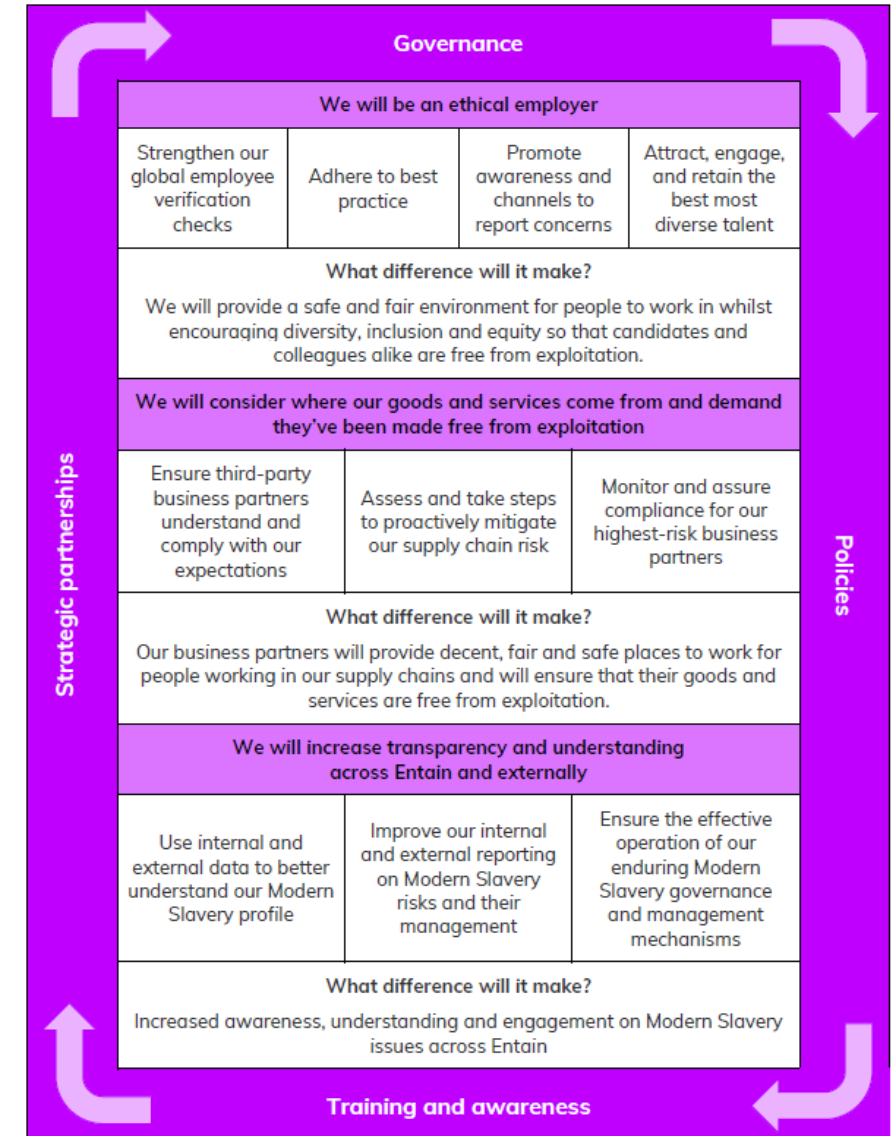
1. be an ethical employer so that colleagues are free from exploitation;
2. demand our goods and services are made free from exploitation; and
3. increase transparency and understanding across Entain and externally.

The Strategy sets out a three-year plan to prevent modern slavery across Entain's workforce and supply chain, with clear priorities on ethical recruitment, supplier risk management, and transparency, supported by a detailed KPI framework that tracks implementation, coverage, risk identification, and remediation progress.

Our aim is to go beyond legal compliance and embed human rights and ethical practices into the business.

The following progress updates cover some of our priorities and objectives with defined KPIs.

Strategy on a page





MODERN SLAVERY STRATEGY

Key progress updates

Priority 1: We will be an ethical employer

Objective: To be an ethical employer, improve standards for people working at Entain and provide a decent, fair and safe place to work

We will continue to focus on strengthening our global employee verification checks, framework and methodology by implementing a global process for background and right to work checks.

Status: Territories currently covered: UK, Gibraltar, India, Ireland, Austria, Bulgaria, Philippines, United States, Columbia, Malta (Entain), Portugal, Spain, Uruguay, Brazil and Canada, covering approx. 9,283 candidates, (82% of predicted recruitment numbers) with a view to 100% coverage by end 2026.

Priority 2: We will consider where our products and services come from and demand they've been made free from exploitation

Objective 1: Use our influence and leverage to improve standards for people working in our supply chains, ensure they have a decent, fair and safe place to work and tackle worker exploitation where we find it

We will improve processes for ensuring third-party business partners are complying with our minimum expectations at the point of onboarding.

Status: To achieve this, work is underway to roll-out a new TPRM programme. During 2025, we implemented and launched the multi-year multi-wave programme with the UK & Ireland first, and further countries coming onboard in 2026.

Objective 2: To fully identify, assess and mitigate the modern slavery risks posed by our suppliers, considering factors such as (but not limited to) supplier location, spend category, supplier spend and country risk

We will perform on-site audits for Entain's highest risk third-party business partners.

Status: We finalised our methodology for supplier site audits, which will be piloted during 2026.



MODERN SLAVERY STRATEGY

Key progress updates (continued)

Priority 3: We will increase transparency and understanding across Entain and externally

Objective 2: To increase transparency in our external reporting on our Modern Slavery Programme, sharing the progress we have made, the issues we have identified and the steps we have taken to remediate these issues

We will enhance our modern slavery statements by including more comprehensive disclosures on key risk areas by ensuring we capture best practice approaches in relation to reporting.

Status: [Achieved a Tier 2 rating from CCLA for statement covering financial year 2024.](#)

Governance

Objective: Modern Slavery Steering Group meets regularly to drive forward our Modern Slavery Strategy

Modern Slavery Steering Group meets regularly to drive forward our Modern Slavery Strategy.

Status: The intention was to hold at least four meetings per year which was achieved during 2025.

Objective: Track relevant evolving legislative and regulatory requirements in relation to modern slavery around the world

We will develop a formal regulatory requirements framework by key territory to cross-check policies and disclosures and thereafter track legislative and regulatory developments and report to the Modern Slavery Steering Group.

Status: The framework was developed and reviewed by the Modern Slavery Steering Group at the end of 2024. A legislative and regulatory update was provided to the Modern Slavery Steering Group during 2025, using the approved framework.

Objective: To identify and work with appropriate external partners who can challenge, drive and support us in delivering our Modern Slavery Strategy and Programme

Status: During 2025, we assisted Stop the Traffik with translations of their STOP APP, into thirteen different languages, helping to bring the app to a wider audience. In addition, we assisted with data protection related queries, regarding the sharing of information with other NGOs.

Σ TRAINING & AWARENESS

Training

Modern slavery training is included as part of the annual mandatory 'Big4' eLearning training programme, which also covers other ethics and compliance related topics, such as safer gambling, data privacy and bribery. The Big4 is updated every year and in 2025, we refreshed our training strategy to ensure that all Entain colleagues have a common baseline of knowledge that is critical to our operations, with a focus on real-life examples.

During 2025, the training was available in 12 languages to ensure that we are educating our colleagues on the issue of modern slavery as much as possible in their local language. This training was completed by around 24,500 colleagues.

Every colleague, unless a justified exception applies, must complete all four modules of the Big4 training. For colleagues eligible to participate in the Group bonus plan, bonus payments can be reduced to zero if all four modules are not completed

In addition to the mandatory Big4 training, we annually assess and identify higher-risk teams who need an enhanced understanding of modern slavery. Enhanced modern slavery training, which explores the risks, their impacts, and how to identify and mitigate issues relevant to specific roles, was delivered to the People team and two markets in our global operations. Our 2026 plan will continue to cover all high-risk teams.

We achieved a 98% average completion rate globally for our Big4 training. The module which included modern slavery content achieved a completion rate of 96.3% across the Group.

Awareness

Employees across the Group received ad-hoc communications regarding modern slavery updates. Topics included sharing the publication of the 2024 statement, news stories highlighting human rights abuses and policy updates.

Σ COLLABORATION



We maintained an open dialogue with GoodCorporation throughout 2025. While there was no formal engagement during the year, we continue to explore opportunities for future collaboration to improve the maturity of our programme using their expertise. We intend to re-engage with GoodCorporation in 2026 to support the next phase of our human rights and modern slavery risk management programme.

GoodCorporation is a leading consultancy in the field of business ethics, compliance and corporate sustainability. It maintains a proprietary database of human rights risks by country, incorporating risk factors such as governance, transparency and environmental protection, alongside indicators relating to labour rights, child labour, modern slavery and workplace equality.

GoodCorporation's human rights framework is grounded in emerging international best practice and is aligned with key standards, including the UN Guiding Principles on Business and Human Rights, the UN Guiding Principles Reporting Framework, the UK Modern Slavery Act, and the International Labour Organisation Declaration of Fundamental Principles and Rights at Work.

Previous collaboration with GoodCorporation supported the development of an independent supply chain modern slavery risk assessment, building on earlier work conducted in 2022 by the anti-modern slavery charity Unseen and further strengthening our understanding of supply chain risks.



In addition, we continued to collaborate closely with First Advantage (Sterling), our third-party provider supporting the global delivery of right to work and background screening across the group. Through ongoing engagement, governance and the sharing of insight and emerging risk trends, we continued to enhance our controls, strengthen workforce due diligence processes and support ethical employment practices across our operations and responsible employment practices.

Σ LOOKING AHEAD

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.

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

We continue to progress oversight in line with our Modern Slavery Strategy and continue to implement actions and KPIs that we can use to effectively monitor our activities in this area and measure their impact. In 2026, to further enhance our modern slavery programme, we will:

Continue to embed our Group-wide TPRM platform and to harmonise existing processes with technology improvements to further mitigate third-party risks, including those around modern slavery.

Complete a third-party supplier risk assessment to identify higher risk supply chain partners, including from a modern slavery risk perspective.

Pilot the periodic, risk-based on-site audit process for Entain's highest risk business partners, based on the results of the supply chain risk assessment.

Progress with our phased right to work and background check programme, working closely with our third-party provider to implement this effectively across the Group.

Continue to implement, operationalise, and monitor our Modern Slavery Strategy 2024-26, incorporating the required content as per the UK Government's guidance issued during 2025, where appropriate.

Continue 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 11 June 2026.

Entain plc | Incorporated in the Isle of Man under number 4685V

Modern Slavery and Human Trafficking Transparency Statement for Financial Year 2025

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