# **play**tech

# Modern Slavery and Human Rights Statement

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## Scope

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the Act) and sets out the steps which Playtech has taken during the financial year ending 31 December 2021 and have planned for 2022 in order to prevent modern slavery from occurring in its operations and supply chain as well as plans for the future. This statement is made on behalf of Playtech plc and those of its subsidiaries that are required to report under the Act.<sup>1</sup>

#### **Business Overview**

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

Playtech plc is the parent company of the Playtech group (the "Group") and the head office is in the United Kingdom. The Group has c.6,600 employees across 26 countries.

In its operations, the Group's supply chain primarily consists of software, technology and technology infrastructure products and services as well as professional advisory and support services.

#### Commitments

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

The Group remains committed to respecting and upholding the principles embodied in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The Group is committed to taking steps to ensure it is not complicit in the violation of human rights. This includes human trafficking and slavery which can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse.

Every employee has the responsibility to uphold the principles set out in this statement in addition to complying with the Group's Code of Ethics and Business Conduct.

<sup>&</sup>lt;sup>1</sup> Playtech Software Limited, Playtech Services Malta Limited, Playtech Services (Cyprus) Limited, Snaitech SPA and VF 2011 Limited.



Employees are required to adhere to these principles, and to all related policies, practices and procedures.

#### **Policies**

In 2021, Playtech published its Human Rights Policy, updated its Recruitment Policy and refreshed its Business Ethics Policy. Playtech enhanced its Speak Up channel and capabilities with a new supplier to support its independent speak up line services. The Speak Up Policy was also updated to reflect information about the new provider and updates to the EU Whistleblowing Directive.

In addition, Playtech developed a new Bullying, Harassment & Respect Policy in the UK, which is planned to be rolled out to the rest of the Group in 2022. Playtech also updated its flexible working policies, which include requirements and standards to support Playtech's commitments to employee wellbeing as well as provisions to mitigate modern slavery risk in our operations and supply chain. During 2021, Playtech issued its Wellbeing policy and continued to support the physical, mental, social and financial wellbeing of its workforce.

In 2022, the Company intends to update its Human Rights Policy as well as its requirements for supplier and business partners.

## **Governance and Accountability**

For the first half of 2021, the Group's Risk and Compliance Committee had ultimate responsibility for overseeing the Company's approach to human rights and its actions to mitigate modern slavery. In June 2021, the Playtech Board established a new Sustainability and Public Policy Committee to review, monitor and advise on Playtech's sustainability, responsible business and public policy matters, as well as remediation if modern slavery is found. The Committee has assumed responsibility and oversight of human rights risks, alongside other sustainability issues, as part of its remit going forward.

# **Due Diligence Processes and Third Parties**

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

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

In 2022, the Company intends to update its human rights and modern slavery questionnaire, which will be deployed as part of the due diligence and onboarding process. Playtech continues to review the effectiveness of its approach as part of its compliance and human rights risk assessment in 2021, to be repeated in 2022.



#### **Risk Assessments**

As a provider of software and services to the gambling and financialtrading industries, Playtech recognises that human and labour rights and modern slavery issues can occur in the technology sector supply chain. These may involve issues related to recruitment practices, discrimination, workplace practices and conditions of third parties manufacturing technology hardware, privacy and data protection concerns as well as risks associated with human trafficking and modern slavery by third parties.

During 2021, the scope of the Company's risk assessment included a review of the impact of the pandemic on human rights in its supply chain, the efficacy of processes and procedures for managing third parties used in employment practices, as well as strengthening audit procedures and supplier human rights assessments.

As part of the risk assessment, Playtech engaged with third-party experts and conducted a series of internal interviews with different parts of the business to review policies and systems in place to mitigate and/or remediate any human rights issues. A risk assessment matrix is used to look at supplier sectoral risk, country risk and spend data and identified six priority categories: "Live operation equipment", "Live operation studio", "office cleaning and security", "recruitment", "retain hardware" and "terminals service and maintenance". Suppliers within those six categories are prioritised based on their geographical location. To identify country-specific risks, Playtech took account of a number of external indices in its process, including the UN Human Development Index, Freedom House's Freedom in the World Report, the US State Department Trafficking in Persons Report, the Global Slavery Vulnerability Index and the World Bank Worldwide Governance Indicators – Regulatory Quality.

In 2022, the Company will conduct a deep dive review of high-risk suppliers identified. Playtech will also continue an in-depth review of internal processes across the organisation.

# **Engaging with Trade Unions and Works Councils**

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

# Training and Awareness Raising

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

During 2021, the Company delivered a refreshed and expanded human rights and modern slavery training and awareness for a wider group of functional roles including procurement, legal, HR, business unit and site management and data privacy subject matter experts. In 2022, Playtech will continue to broaden awareness and reach across the Group, increasing the range of relevant employees and senior managers, including relevant Playtech staff involved with Joint Ventures and newly established operations in markets such as the U.S. and Latin America. In addition, Playtech will roll out a company-wide Bullying and Harassment training to raise awareness and skills base on how to deal with issues at an appropriate level.



## **Monitoring and Reporting**

In 2021, the Group continued to monitor and track potential human rights and modern slavery issues as part of its overall compliance risk management programme. In 2022, Playtech will utilise KPIs to report on progress to the Sustainability and Public Policy committee of the Board. KPIs that are currently monitored include:

- Number of reports raised through the Speak up/whistleblowing hotline;
- Number of flags raised through the compliance KYC portal and monitoring tool; and
- Number of ethical and human rights issues raised via Joint Ventures risk assessments.

When issues are identified, the Compliance function reviews and decides the best course of action and resolution on a case-by-case basis. The Group continues to promote an independent, confidential "Speak Up" line for employees to use to report any ethical or legal concerns, including human and labour rights concerns. This is communicated via local human resource focal points and promoted during annual compliance training. In 2021, Playtech strengthened its hotline service and capabilities with a new supplier. During the year, there were no human rights and/or modern slavery issues raised via this channel.

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

This statement was approved by the Board of Directors of Playtech plc on behalf of Playtech plc and as the management body for each reporting entity on 22nd June 2022.

#### **Mor Weizer**

CEO, Playtech plc

