



# MODERN SLAVERY AND HUMAN RIGHTS STATEMENT

ALL-STM-001

May 2023

## 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 2022 and have planned for 2023 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 completed the sale of its Financials Division, Finalto, in July 2022. This represented a significant step in the Company's stated strategy to simplify the Group and focus its efforts on the high-growth B2B and B2C gambling markets.

Playtech plc is the parent company of the Playtech group (the "Group") and the head office is in the United Kingdom. The Group has c.7,000 employees across 20 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. The top three supplier countries by spend are the United Kingdom, Gibraltar and Israel.

## 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.

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

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

## POLICIES

In 2022, Playtech reviewed and updated its Procurement, [Human Rights](#) and [Business Ethics](#) policies to strengthen oversight and mitigate compliance, ethical and climate-related risks and to ensure minimum standards are adhered to when entering joint ventures. The Human Rights policy reiterates the Company's commitment on responsible recruitment and remediation, where human rights risks materialise into adverse human rights impacts. During 2022, Playtech developed its first [Supplier Code of Conduct](#), published in February 2023. The Code was developed to set out the Company's commitments and expectations of its suppliers, to:

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

During 2022, Playtech refreshed its Global Health and Wellbeing policy and continued to support the physical, mental, social and financial wellbeing of its workforce. In addition, the Group deployed a refreshed global Recruitment and Diversity, Equity, Inclusion and Belonging policies, as well as a new [Board Diversity Policy](#) published in March 2023, to confirm Playtech's commitment to recruit from a diverse, qualified group of candidates with a mixture of skills, professional and industry backgrounds, geographical experience and expertise, gender, tenure, demographics, disability, ethnicity and diversity of thought, which are instrumental for the long-term success of the Company. The Company also rolled out a Global Bullying, Harassment & Respect policy, supported by the launch of an online unconscious bias training to all employees as well as a bullying and harassment training for managers.

In 2023, the Company intends to review and update its Speak Up, Business Ethics, Anti-Money Laundering and Anti-Bribery and Corruption Policies as well as its requirements for suppliers and business partners.

## GOVERNANCE AND ACCOUNTABILITY

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

The Sustainability and Public Policy Committee also review the use, effectiveness, and implementation of the Human Rights policy on an annual basis, considering its suitability, adequacy, and effectiveness.

## RISK ASSESSMENTS

As a provider of software and services to the gambling industry, 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 that manufacture technology hardware, privacy and data protection concerns as well as risks associated with human trafficking and modern slavery by third parties.

Key areas of focus for 2022 included the reinforcement of processes and procedures for managing third parties used in employment practices, reviewing and strengthening audit procedures and strengthening supplier human rights assessments. In 2022, Playtech enhanced its supplier risk assessment and profiling to identify sectoral risks as well as risks from their geographical location.

A third-party company with expertise in human rights and modern slavery was appointed to assist with the risk assessment. A risk assessment matrix was used, looking at sectoral risk, country risk and spend data to prioritise next steps. The Company has reviewed 133 supplier sectoral categories and has given a human rights and modern slavery risk rating from “low” to “high” for each category. The Group has identified 57 “high” and “medium” categories as priority categories. 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, with the addition of the UNICEF Child Rights Atlas – Workplace Index.

In 2023, the Company will conduct a deep dive review of responses from the high-risk suppliers identified through the assessment process. Playtech will also continue an in-depth review of relevant internal controls and processes across the organisation.

## DUE DILIGENCE PROCESSES AND THIRD PARTIES

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

Playtech continues to require its customers, suppliers and other business partners to act in accordance with international human rights standards. 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.

During 2022, the Company developed a dedicated human rights and modern slavery questionnaire. The questionnaire includes questions on management systems, employee

composition and labour practices. The analysis of responses enables Playtech to oversee the ways in which our suppliers are managing their own human rights risks within their operations and supply chains. The questionnaire includes questions related to supply chain mapping, management of labour agents, outsourcing and subcontracting as well as their own due diligence, such as how they manage their recruitment processes. During 2023, Playtech will deploy the questionnaire to those suppliers, for those that have been identified as being in a high-risk sector and/or high-risk location through our human rights risk mapping. The Company expects its suppliers to confirm they uphold Playtech's standards, acknowledge expectations contained in the Supplier Code of Conduct in writing and to agree to conduct their businesses in line with them.

Playtech will continue to review the effectiveness of its approach as part of the assessment.

## **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 2022, the Company delivered a human rights and modern slavery training and awareness to all employees, as well as a bullying and harassment training to raise awareness and skills base on how to deal with issues at an appropriate level. In 2023, Playtech will continue to broaden awareness and reach across the Group through targeted sustainability training, including modern slavery and human rights for relevant functional roles, including procurement, legal, finance and HR.

## **MONITORING AND REPORTING**

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

- Number of reports raised through the Speak up/whistleblowing hotline;
- Number of 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 defines the best course of action and resolution on a case-by-case basis. The Group continues to promote an independent, confidential "Speak Up" line for employees to use to report any ethical or legal concerns, including human and labour rights concerns. This is communicated via local human resource focal points and promoted during annual compliance training. The During 2022, Playtech had two incident reports, anonymously submitted in writing via the Speak Up platform. These incidents triggered the internal review and escalation process to the Chief Compliance Officer and General Counsel for review and have now been resolved. No human rights and/or modern slavery issues raised via this channel. Suppliers and business partners are also

encouraged to report any behaviour that may be in breach of the Supplier Code of Conduct promptly via the independent anonymous "Speak up" line or using the freephone numbers available on the Speak Up landing page.

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

This statement was approved by the Board of Directors of Playtech plc on behalf of Playtech plc and as the management body for each reporting entity on 24th May 2023.

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CEO, Playtech plc