



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 2020 and have planned for 2021 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.¹

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 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 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 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.6,400 employees across 24 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.

Policy 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 respect and uphold 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.

In 2020, Playtech refreshed its Business Ethics and Speak Up policies. In addition, Playtech developed and issued new Joint Venture and 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.

To that end, in 2020, Playtech also launched a new Wellbeing strategy to support the physical, mental, social and financial wellbeing of its workforce. A policy to support this strategy and programme will be introduced during the course of 2021.

In 2021, the Company also intends to publish and/or update the following policies

- **Human Rights Policy** – A standalone policy, which supplements Playtech's commitments to respect human and labour rights, which are currently embedded in its business ethics policy as well as other relevant policies.
- **Recruitment Policy** – The inclusion of principles and procedures in scenarios where a Playtech entity recruits migrant workers covering the recruitment process, fees, contracts, freedom of movement.
- **Speak Up Policy** – Playtech will introduce new supplier to support independent speak up line services. The Policy will be updated to reflect information about the new provider and updates to the EU Whistleblowing Directive.

Governance and Accountability

During 2020, 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. During the first half of 2021, the Playtech Board outlined its intent to establish a standalone sustainability (ESG) committee, which will assume responsibility and oversight of human rights risks, alongside other sustainability issues, as part of its remit going forward and for the remainder of 2021.

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.

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 this process, Playtech requests third parties (including suppliers, partners and licensees) to complete a questionnaire as part of due diligence in its compliance risk assessment procedure. This process requires them to provide details of any policies, procedures, statements or programs they have in relation to human and labour rights (including modern slavery). Through this due diligence process, Playtech assesses such third parties' commitment to upholding human and labour rights. Following the completion of this process due diligence and onboarding process, Playtech monitors individuals and organisations on an ongoing basis in a centralised, automated portal. The portal is programmed to monitor and flag a range of compliance issues, including human rights and labour rights issues.

Playtech continues to require its licensees, 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 licensors in their supply and delivery chains as well as the rest of the commercial ecosystem to adhere to human rights and modern slavery regulations.

Playtech has begun to implement this approach at the Group level and will focus its efforts in 2021 on ensuring that there is a consistent approach across its operations and subsidiaries, including recently acquired businesses. Playtech will also review the effectiveness of its approach as part of its compliance and human rights risk assessment in 2021.

Risk Assessments:

As a provider of software and services to the gambling and financial trading industries, we recognise the human and labour rights and modern slavery issues that potentially 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 3rd parties.

During the course of 2020, the Group completed a firm-wide compliance risk assessment which included a human rights and modern slavery risk assessment. This process included a review of human rights and modern slavery risks across Playtech's business units, geographies and key functional areas (such as employment, procurement and data protection).

Facilitated by an external legal advisory firm, the risk assessment identified a number of recommendations to strengthen its approach to mitigating human rights and modern slavery risk management. As a result, Playtech is:

- Strengthening policies and systems in procurement and human resources;
- Mapping migrant labour and recruitment practices;
- Introducing a new standalone human rights policy;
- Expanding human and labour rights training and awareness activities; and
- Completing a risk assessment for selected business divisions involved with procuring technology hardware and/or technology components.

Engaging with Trade Unions and Works Councils:

Playtech respects and supports the rights of its employees to organise and participate in trade unions and works 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, our policies are communicated to staff via their local human resources focal points as well as through our annual compliance training programme.

During 2020, human rights and modern slavery training and awareness was held for relevant functional roles including procurement, legal, HR, business unit and site management and data privacy subject matter experts. In 2021, a refreshed and expanded training will be delivered, offering sessions via its Playtech Academy platform to support broader awareness and reach across the Group. The objective will be to reach a broader range of relevant employees and senior managers. Awareness and training will also be extended to relevant staff involved with Joint Ventures and newly established operations in markets such as the U.S. and Latin America.

Monitoring and Reporting

In 2020, the Group continued to monitor and track potential human rights and modern slavery issues as part of its overall compliance risk management programme. In 2021, Playtech will utilise KPIs to report on progress to its ESG 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
- Number of issues raised via Joint Ventures risk assessments

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 with employees during annual compliance training. In 2020, there were no human rights and/or modern slavery issues raised via this channel. In 2021, Playtech will strengthen its speak up line capabilities with a new supplier.

Playtech will continue to report on measures it takes to identify and mitigate human rights and modern slavery risk 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 23 June 2021.

Mor Weizer

CEO, Playtech plc