



Human Rights Policy

Approved by the Board 25 May 2021

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POLICY STATEMENT

Playtech is committed to conducting its business with respect for human rights. As part of this commitment, we strive to honour all internationally recognised human rights understood, at a minimum, as those enshrined in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights as well as the core international human rights treaties and the ILO Declaration on Fundamental Principles and Rights at Work.

Our approach is guided by the principles outlined in the United Nations Guiding Principles on Business and Human Rights and the UN Global Compact, which should be construed by reference to, this Policy, related Playtech policies set out below and procedures and any relevant implementation guidance.

We are committed to:

- Respecting human rights;
- Implementing internal control systems and procedures to detect, prevent and respond to human rights risks and breaches in our operations as well as, where possible, in connection with our business relationships;
- Upon identifying potential human rights violations, Playtech shall thoroughly investigate and seek to understand/support remediation, where Playtech has been found to cause or contribute to adverse human rights outcome within its direct operations;
- Setting clear expectations and communicating as to how we address human rights risks internally and externally; and
- Continuously reviewing and updating this Policy.

PREFACE

PURPOSE

The purpose of this Policy is to:

- set out Playtech's responsibilities, and the responsibilities of those working for and with Playtech, in observing and upholding Playtech's commitment to respect human rights; and
- provide information and guidance to those working for and with Playtech on how to detect, prevent and respond to human rights risks and incidents of breach.

APPLICATION OF THIS POLICY

This Policy applies to the Playtech group of companies, which means Playtech Plc as well as the subsidiaries of Playtech Plc (collectively referred to as 'Playtech' in this Policy).

All persons working for or on behalf of Playtech in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns (collectively referred to as 'Personnel' in this Policy) must comply with this Policy.

Where appropriate and as agreed, it will apply to agents, contractors, external consultants, third-party representatives and business partners, sponsors, joint venture partners or any other person associated with us, wherever located (collectively referred to as 'Business Partners' in this Policy).

Playtech may terminate its relationship with Business Partners, other individuals or organisations working on its behalf if they breach this Policy.

From time to time, Playtech will engage third-party specialists to advise on legal and ethical matters. This does not, however, absolve Personnel or Business Partners from their responsibilities and obligations set out in this Policy.

This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time. However, it is accepted as an integral aspect of the Playtech working environment and Personnel are trained to know it and, equally, aware of the expectation that they are required to comply with it.

This Human Rights Policy will also be provided to all new Personnel at induction. The Policy will also be made available on Playtech's secured shared sites.

Exceptions to this Policy are not permitted.

OVERSIGHT OF THIS POLICY

Playtech's board of directors is responsible for approving this Policy.

Playtech's Board Sustainability (ESG) and Public Policy Committee has overall responsibility for ensuring that this Policy complies with Playtech's legal and ethical obligations and that all those under its control comply with the Policy.

The sustainability function within the Compliance and Regulatory Affairs function has a primary and day-to-day responsibility for overseeing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring that processes are in place to audit internal control systems and procedures to ensure they are effective.

Management Personnel at all levels are responsible for ensuring that those reporting to them understand and comply with this Policy and are given adequate and regular training on it.

Site operations are responsible for ensuring that this Policy is transposed into its local procurement and human resource processes and procedures, such that its implementation is controlled and managed locally. The relevant management roles in site operations as well as functions are responsible for providing information to the central compliance team for the purpose of confirming that human rights risks have been identified, managed and monitored in line with this Policy.

- The global head of procurement, relevant management roles in site operations as well as functions are responsible for ensuring that human rights risks, alongside other responsible business issues, are considered in the purchasing and vendor management process, including due diligence of suppliers. These functions are also responsible for providing timely data and information to the compliance team for the purposes of identifying, managing and monitoring human rights risks.
- The human resource function is responsible for ensuring that workforce related human rights risks and mitigation measures are in place and part of relevant policies and human resource risk management processes.
- The sustainability function within the compliance and regulatory affairs team is responsible for conducting and identifying human rights risk assessments as part of its annual compliance risk assessment process. In addition, the compliance team, working with the internal functions for risk and audit will ensure that human rights risks and controls are regularly reviewed, documented, and reported through the Company's risk management system, *Metricstream*.

COMPLIANCE MANAGEMENT

Playtech's Board Sustainability (ESG) and Public Policy Committee will review the use, effectiveness, and implementation of this Policy on an annual basis, considering its suitability, adequacy, and effectiveness. Any improvements identified as needed, will be made as soon as possible.

Personnel are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance and Regulatory Affairs team.

Any risk of non-compliance with this Policy must be escalated to senior management, who are responsible for managing or, where appropriate, escalating such risks to Compliance and Regulatory Affairs and/or Legal team.

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1 RESPECT FOR HUMAN RIGHTS

Human rights are inherent in all human beings, whatever and irrespective of their nationality, place of residence, gender, national or ethnic origin, colour, religion, language, or any other status or subcultural segmentation. The foundation of human rights is the idea that people have a right to be treated with dignity.

Human rights are often expressed and guaranteed by treaties or customary international law and/or incorporated into domestic law and private legal obligations.

In this Policy, human rights risks refer to potential adverse human rights impacts. Human rights risks should be prevented or mitigated as far as possible. Where human rights risks materialise into adverse human rights impacts, they require remediation.

1.1 WHAT WE EXPECT FROM YOU

Playtech Personnel and, where applicable, Business Partners must:

- Comply with all applicable national laws and regulations wherever we operate. Where national law and international human rights differ, you should aim to follow the higher standard; where they are in conflict, you should adhere to national law, while seeking ways to respect international human rights to the greatest extent possible;
- Read, understand and comply with this Policy and never knowingly engage in any activity that might lead to non-compliance with this Policy;
- Report known or suspected violations of this Policy to the Chief Compliance Officer, Director of Human Resources, General Counsel and/or the Playtech Speak Up line; and
- Comply with Playtech policies related to third party due diligence and inclusion of relevant ethics clauses in contracts with suppliers and third parties.

Those with managerial responsibility for others must ensure that their teams are familiar with and comply with this Policy.

1.2 POTENTIAL RISK AREAS

The following is a list of possible concerns that may raise concerns related to human rights risks. The concerns below are illustrative of the types of issues that should be considered by Personnel and Business Partners in any activities taken for or on behalf of Playtech.

The list is not intended to be exhaustive and is for illustrative purposes only:

- Lack of awareness and understanding of human rights risks and relevant Playtech policies, processes, procedures and guidance;
- Inadequate organisational human rights risk governance and risk management;
- Instances of forced, bonded or involuntary labour in the supply of goods and services to Playtech;
- A recruitment fee, financial contribution or other form of financial loan is required for recruitment, processing or placement;
- Workers not provided with written terms and conditions of employment and benefits for their review before they begin working or that there are no safeguards in place to ensure that the

offered terms and conditions of employment and benefits are maintained once work is commenced;

- Identity papers (for example, visas, passports, travel papers) are confiscated from workers or unduly interfering with their freedom to leave their employment after reasonable notice in accordance with the law;
- Workers are prevented from forming or joining trade unions or their right to collectively bargain is restricted other than in accordance with local applicable law. This includes instances of discrimination or harassment of worker representatives or their ability to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted by law, there should be parallel means for independent and free association and bargaining available;
- Working conditions are unsafe or adequate steps are not being taken to prevent accidents or injury to health and safety arising out of, associated with, or occurring during the course of work, by minimising, so far as is reasonably practicable, the causes of hazards in the working environment through management systems, regular training and any other relevant legal requirements. Where accommodation is provided it should be clean, safe and meet basic needs;
- Children or young workers below the age of 15 are employed or young workers between the ages of 15 and 18 are engaged in "hazardous work" other than in accordance with the provisions of the relevant International Labour Organization (ILO) standards;
- wages are not paid regularly, on time, or in accordance with local law or contractual requirements; and
- working hours are required beyond legal limits.

If you encounter any of these concerns, you must report them promptly using the procedure set out below.

2 ASKING QUESTIONS AND SPEAKING UP ABOUT HUMAN RIGHTS RISKS

Personnel are and should feel entitled to voice concerns about anything they find unsafe, unethical or unlawful in a responsible, appropriate and effective manner and at the earliest opportunity without fear of undue criticism or retaliation. All such disclosures will be treated in a confidential, sensitive, and respectful manner.

In the first instance, Personnel should raise any questions or concerns they may have in relation to this Policy or potential violations of it with their line manager or local HR manager.

Where the matter is more serious, or Personnel feel that their line manager has not addressed the concern, or an individual prefers not to raise it with them for any reason, Personnel may contact one of the following:

- Chief Compliance Officer
- General Counsel and Head of Corporate Development ('General Counsel')
- Global Head of Human Resources and/or the local HR representative or HR business partner

However, if the nature of the matter is such that you cannot raise it with any of the contacts identified above or, if you have followed the internal channels listed above and you still have concerns, you can contact our confidential external '*Speak Up Line*'.

The *Speak Up Line* is an independent external hotline provided by Convercent for Playtech which allows employees across the Playtech group to raise concerns in their native language via telephone or via a secure web portal. Where permitted by local law, employees may choose to remain anonymous when raising a concern.

More details can be found in Playtech's [Speak Up Policy](#).

Any reporting related to Snaitech Operations should be addressed to odvsnai@snaitech.it or by ordinary mail to: Organismo di Vigilanza SNAITECH S.p.A. Piazza della Repubblica n. 32 20124 – Milano.