

Approved by the Board

Version 3.0

ALL-POL-035

November 2023

#### CONFIDENTIAL

The content provided herein is the exclusive property of the Playtech Group and is subject to copyright laws. Any redistribution or reproduction of part or all of the contents herein in any form is prohibited, except that you may download a copy of this policy for your personal and non-commercial use only. Subject to the preceding sentence, you may not distribute or commercially exploit the contents herein, nor may you transmit it or store it in any other website or other form of electronic system. You may not alter or remove any copyright or other notice from copies of this document. The information upon which this document is based is subject to future change. Updated versions of this document will be released, when necessary, resources permitting. The information in this policy is intended for informative purposes only and should not be construed as, nor relied upon as, legal advice.

# **CONTENTS**

1	Policy Statement	. 1
2	Application of this Policy	. 1
3	Policy Oversight	. 1
4	Environmental Principles	. 2
5	Governance	.3
6	Site Operations	.3
7	Procurement and Vendor Management	. 4
	Business Travel	
9	Transparency Assurance and Reporting	_

### 1 POLICY STATEMENT

Playtech is committed to minimising its environmental footprint, while taking action to reduce its Greenhouse Gas (GHG) emissions, waste, and water impacts in its business operations and value chain and maintaining the Company's resilience to environmental risks and impacts.

The environment, and particularly climate change, is a growing area of concern for all our stakeholders, including investors, our employees, and the communities where we operate.

The Company also recognises that urgent action is required to substantially reduce the risks and impacts of climate change globally and in the countries, cities, and communities in which it operates.

Playtech's most material direct environmental impact is the GHG emissions stemming from the electricity used across its offices and datacentres.

As part of Playtech's sustainability strategy, Sustainable Success, Playtech has set a specific target to reduce its GHG emissions by 40% by 2025 against a 2018 baseline.

Playtech have also committed to a reduction of 50.4% in its scope 1, 2 and 3 emissions by 2032, as the Company sets in motion its Net Zero by 2040 plan. This has been submitted to the Science-based Targets initiative to ensure Playtech's journey to decarbonisation is in line with limiting global warming to 1.5°C, as per the Paris Agreement.

Playtech is also committed to encouraging and supporting employee action to address environmental impacts in the communities where it operates as well as in the workplace.

# 2 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). Playtech must comply with all environmental laws and regulations in place in the countries where it operates. If any such local laws are not as strict as the terms of this Policy (including the laws and regulations referenced in it), then the terms of this Policy must be applied to the extent permitted by local law.

# 3 POLICY OVERSIGHT

Playtech's Board of Directors is responsible for approving this Policy.

Playtech's Sustainability and Public Policy Committee has overall responsibility for approving this Policy, monitoring its effectiveness, raising risks to the Board of Directors and ensuring that appropriate actions are taken to mitigate such risks. The Management Committee is responsible for ensuring the implementation of Playtech's public commitments and targets as well as regulatory, legal, and ethical obligations, and that all those under its control comply with the Policy.

The Sustainability function has the primary and day-to-day responsibility for overseeing this Policy, monitoring its use and effectiveness, responding to any queries about it, and ensuring that processes are in place to audit internal control systems and procedures to ensure they are effective.

ALL-POL-035 Confidential 1

Appropriate training is provided to managers explaining the content of the policy, their responsibilities and where further information can be obtained. This is supplemented by training and briefings to employees. Employees 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 Sustainability team, at <a href="mailto:sustainability@playtech.com">sustainability@playtech.com</a>.

# 4 ENVIRONMENTAL PRINCIPLES

Playtech is committed to upholding the following principles:

- Comply with all relevant environmental legislation, as well as other environmental requirements, where Playtech operates and provides services.
- Measure and take action to reduce our Scope 1 and 2 carbon footprint across our business operations to meet our published targets. Transition to renewable electricity, where technically feasible and available in the markets where we operate. Measure our Scope 3 carbon footprint, set targets to reduce emissions in line with climate science, and report on progress.
- Manage use of water and waste generated from our business operations, incorporating reduction, re-use and recycling, where possible.
- Ensure environmental criteria are taken into consideration in our vendor management processes. We will seek partnership with suppliers, customers, and partners to improve environmental performance, including the protection, conservation and restoration of biodiversity to address climate change.
- Minimise use of resources and improve the efficient use of those resources.
- Meet the needs and safeguards for animals set out in equivalent guidance provided by the specific market where operations are located.



**Note:** Snaitech runs horse racing operations and is therefore required to comply with the Italian Code for the Protection and Management of Horses (Codice per Ia tutela e la gestione degli equidi), which sets out the essential parameters for the proper management of animals in the facilities where they are kept and the activities in which they are used, respecting their ethological and welfare needs. Snaitech provides horse training facilities used by third-party horse trainers. Contractual agreements set out those trainers' obligations, including for the feeding, environmental conditions, custody, animal welfare, health and food safety, protection and security of the horses entrusted to them.

- Understand and minimise where possible the impacts of Playtech's operations and value chain on biodiversity and nature.
- Understand environmental risks and opportunities, including those linked to climate change, and mitigate and adapt to these impacts to minimise risk and leverage opportunity, in line with the requirements of the Taskforce on Climate-related Financial Disclosures (TCFD).
- Encourage employees to generate ideas about how Playtech can reduce its impact on the environment, including the participation in environmental protection initiatives in the workplace and in the communities where we operate.
- Continuously improve our environmental performance internally and as part of our annual reporting and processes.

# **5 GOVERNANCE**

The Board Sustainability and Public Policy Committee has overall responsibility for this Policy and the Group's environmental strategy.

The Sustainability and Corporate Affairs function is responsible for coordinating the Company's strategy across sites and relevant functions. The Sustainability team is also responsible for communicating and disseminating this policy as well as overseeing internal and external reporting.

Playtech's environmental working group, a cross functional forum, oversees the Company's environmental and GHG reduction strategy. Participants include representatives from internal audit, risk, procurement, site operations, tax, investor relations and infrastructure/ technology.

This forum meets quarterly, coordinated by the Sustainability team with support from external specialist environmental advisors, and provides performance updates on local environmental initiatives. The Group's environmental progress is then communicated to the Sustainability and Public Policy Board Committee on a quarterly basis. The forum's remit includes:

- Communication and implementation of the environmental strategy and initiatives at the local sites:
- Provide progress updates on the local GHG reduction initiatives;
- Participate in the climate risk assessment process to integrate climate risks into financial risk assessment;
- Review and define actions to comply with local and global regulatory requirements and ESG reporting frameworks;
- Provide input on additional Group-wide environmental targets including on water use and waste generated; and
- Review and update GHG emission reduction targets and strategy at a local level to meet the Company's published targets.

# 6 SITE OPERATIONS

Each Playtech office shall nominate a responsible individual (and/or team) to oversee operational environmental management.

Each site will set local targets that align with Playtech's environmental strategy and objectives. Progress against these targets will be recorded locally and provided to the Sustainability function annually to monitor performance and progress towards the achievement of the Group's objectives.

Each site should document its approach to environmental management, including roles and responsibilities, compliance with local requirements, energy management, environmental management systems and relevant certifications.

Where leasing offices, site operations should proactively engage with landlords to explore opportunities for reducing environmental impacts including energy consumption, waste and water management.

Site operations are responsible for communicating the local environmental strategy to employees.

The financial controllers at site operations are responsible for working with the nominated individual to collect, analyse and report on environmental data, as per the methodology and reporting templates provided by the Sustainability function.

Site operations should maintain accurate records regarding environmental data and ensure that there is quality control mechanism to ensure that data and financial expenditures are accurate.



**Note:** For some entities in the Group (for example Snaitech), business units may nominate a single or several focal points to oversee operational environmental management for the entire entity which will include oversight for several sites managed by the business unit.

### 7 PROCUREMENT AND VENDOR MANAGEMENT

The Procurement team is responsible for ensuring that environmental issues, alongside responsible business issues, are considered in the purchasing and vendor management process, including due diligence and broader gating of suppliers.

Playtech will encourage its suppliers to reduce their environmental impact, to the extent that this is feasible.

The Sustainability function is working with business units, including the Technology and Infrastructure function, along with Tax, Finance and Procurement teams will ensure impact on the environment is part of the purchasing decisions. Hardware life cycle management is key when it comes to the disposal, donation or recycling plan at the end of the lifecycle.

#### 8 BUSINESS TRAVEL

Business travel is necessary for Playtech's ability to interact and engage with existing and prospective clients, meet with investors, regulators and other governing bodies, attend conferences, exhibitions and company events, conduct reasonable internal activities, including attendance to Board and Committee meetings. However, Playtech continues to challenge on the need, frequency and mode of travel.

Playtech's strategy for reducing travel emissions involves both reducing the number of journeys employees make and optimising modes of transport to meet travel needs, as much as possible.

Playtech's internal Global Travel policy provides employees with guidance on considering the business needs when requesting travel and outlines the internal process for obtaining relevant approvals and booking travel. As a rule of thumb, employees are expected to:

- Use of virtual methods (MS Teams) as the new standard mode of interacting with internal and external stakeholders. This is mandatory for all internal meetings and preferred for client visits, supplier visits and other necessary internal activities.
- Select the most appropriate mode of transport for business journeys. Playtech encourages employees to use public transportation, where possible.
- Request air travel at the lowest integral cost possible. Cheapest flights would be priority over more costly flights and, where possible, other modes of transport are preferred over flights.

ALL-POL-035 Confidential 4

# 9 TRANSPARENCY, ASSURANCE AND REPORTING

Playtech is committed to reporting on its environmental performance annually and improving the quality and scope of data as part of its annual reporting and in line with evolving regulatory and corporate governance requirements related to environment, including the requirements of the Taskforce on Climate-related Financial Disclosures (TCFD).

Playtech is also committed to participating in external environmental indices and reporting schemes, such as the CDP.

In addition, Playtech seeks independent limited assurance of its Scope 1, 2 and 3 GHG emissions by independent third-party assurance providers.

Where appropriate, Playtech offices are encouraged to seek environmental (ISO) certification for environmental management.

The Internal Audit function conducts assurance engagements across Playtech which can include providing assurance over the processes in place concerning the Group's annual review and relevant assurance of data.

Group-wide environmental performance data are collected annually and maintained in the Group Sustainability Non-Financial Database, with the support of the Company's external specialist environmental advisors.

The Group's reporting criteria and data collection process are reviewed and updated on an annual basis and published as part of Playtech's annual reporting and non-financial performance.