



# Speak Up Policy

Approved by the Board

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# ABOUT THIS POLICY

## POLICY STATEMENT

Playtech is committed to conducting its business with honesty and integrity and to promoting a culture of openness, integrity and accountability.

An important aspect of this commitment to transparency is providing a way for staff and other members of Playtech to voice concerns about anything they find unsafe, unethical or unlawful. These mechanisms must be accessible, independent of line management, and must enable Personnel to voice concerns in a responsible, appropriate and effective manner without fear of criticism or retaliation.

This policy (the 'Speak Up Policy') is designed to support our values, our commitment to safeguard Personnel and to encourage Personnel to seek help and report any concerns they may have.

## PURPOSE OF THIS POLICY

The purpose of this Policy is to:

- Encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated, and that their confidentiality will be respected;
- Provide staff, business partners, contractors and suppliers with guidance as to how to raise those concerns;
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken; and
- Support other related policies including Playtech's [Business Ethics Policy](#), [Anti-Money Laundering and Counter-Terrorist Financing Policy](#), [Anti-Facilitation of Tax Evasion Policy](#), [Data Protection and Privacy Policy](#), [Anti-Bribery and Corruption Policy](#), [Wellbeing Policy](#) and [Human Rights Policy](#).

## APPLICATION OF THIS POLICY

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

This Policy applies to 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, and where appropriate, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other persons associated with Playtech, wherever located. Collectively referred to as Personnel throughout this document.

This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time.

## OVERSIGHT AND MONITORING OF THIS POLICY

Playtech's Risk and Compliance Committee has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Risk and Compliance Committee will review this Policy regularly and at times when legislation or regulation changes that affects this Policy. The Regulatory Affairs and Compliance team ('Compliance') will report to the Risk Committee annually on the implementation of this Policy as well as the number and types of disclosures.

Playtech's Chief Compliance Officer has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in supporting Personnel who wish to speak up.

Each entity within the Playtech group of companies (and its internal compliance function) is responsible for that entity's implementation of this Policy. Senior management, at all levels, are responsible for ensuring that those reporting to them are made aware of and understand this Policy.

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

## **RELATED DOCUMENTS**

[Appendix A](#) lists all documents which relate to or reference this Policy.

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# 1 SPEAKING UP

## 1.1 WHAT IS SPEAKING UP?

Speaking up, or whistleblowing, is raising genuine concerns about suspected unsafe, unethical or unlawful behaviour at work. This may include (but is not limited to):

- Criminal activity;
- Failure to comply with any legal obligation or regulatory requirement;
- Danger to health, safety and/or employee safeguarding concerns under Playtech's Wellbeing Policy;
- Damage to the environment;
- Human rights and/or modern slavery breaches contrary to Playtech's Human Rights Policy;
- Bribery contrary to Playtech's Anti-Bribery and Corruption Policy;
- Facilitation of tax evasion contrary to Playtech's Anti-Facilitation of Tax Evasion Policy;
- Financial fraud or mismanagement;
- Negligence;
- Unethical behavior contrary to Playtech's Business Ethics Policy;
- Money laundering contrary to Playtech's Anti-Money Laundering and Counter-Terrorist Financing Policy;
- Conduct likely to damage Playtech's reputation;
- Unauthorised disclosure of confidential information or other data breaches contrary to Playtech's Data Protection and Privacy Policy;
- Bullying or sexual harassment; or
- The deliberate concealment of any of the above.

This is not an exhaustive list. If there is anything else that is causing Personnel concern, or that Playtech should be aware of, please do speak up.

However, this Speak Up Policy should not be used to:

- Question financial or business decisions taken by Playtech;
- Raise concerns relating to an employee's personal circumstances, such as the terms of their contract. In those cases, the employee should use the Grievance Procedure, which can be found in the employee handbook and/or by asking the Human Resources ('HR') Department for the procedure;
- Reopen matters that have already been addressed under Playtech's harassment, disciplinary or other procedures; or
- Make inaccurate, malicious or vexatious allegations. If an employee makes such complaints, and particularly if they persist with making them, disciplinary action may be taken against them.

If Personnel are uncertain whether something is within the scope of this Policy, they should seek advice from one of the individuals listed in [paragraph 3.1.2](#).

## 2 RAISING A CONCERN

### 2.1 HOW TO RAISE A CONCERN

Playtech hopes that in many cases Personnel will be able to raise any concerns with their line manager, or local HR or business unit representative. Personnel may raise a concern in person or put the matter in writing. The line manager may be able to agree a way of resolving the concern quickly and effectively.

Where the matter is more serious, where Personnel feel that the line manager has not addressed their concern, or where Personnel prefer not to raise an issue with line management for any reason, they may contact one of the following:

- **Ian Ince** – Chief Compliance Officer
- **Alex Latner** – General Counsel and Head of Corporate Development ('General Counsel')
- **Karen Zammit** – Global Head of Human Resources and/or the local HR representative or HR business partner

We would hope that you feel able to report internally to one of the contacts above or someone else within Playtech. 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 Personnel across the Playtech group to raise concerns in their native language via telephone or via a secure web portal. From there, your report will be passed to Playtech and be dealt with in accordance with this Speak Up Policy.

### 2.2 WHAT HAPPENS WHEN A CONCERN IS RAISED

1. When an employee raises a concern (whether by contacting the Chief Compliance Officer, the General Counsel, the Global Head of HR, their local HR representative directly or via the Speak Up Line), the details are channeled to the Chief Compliance Officer and General Counsel to investigate further.
2. Where appropriate, the Chief Compliance Officer and General Counsel may assign a team to conduct an investigation to gather and establish relevant facts relating to the matter. This may include the appointment of an independent, external legal advisor to support the review. Personnel may also be asked to provide further information, or answer questions about their concern, if required.
3. Personnel will receive an initial response to acknowledge receipt of their concern within seven days. From there, the Chief Compliance Officer, General Counsel or their appointed investigating lead will provide regular feedback and updates on the progress of the investigation into their concern (every four weeks at minimum) until the matter has been resolved. If you contact the external Speak Up Line, you will receive a unique case number, which you can use to check the status of your concern and/or add additional information.
4. Playtech will use its best efforts to finalise the investigation process as soon as possible, but the duration of an investigation can vary depending on the complexity and severity of the concern raised. Playtech aims to resolve all matters, and to provide feedback to the employee, within three months of the report.

5. Following the investigation, the investigating lead will produce a written report on the matter containing the findings of the investigation, the reasoning behind the decision and recommendations to address the issue. The report will be shared with the Chair of the Risk Committee of the Board and with the Chief Executive and Chairman.
6. Once the relevant members of senior management have been informed and consulted without compromising any confidentiality, the Chief Compliance Officer and General Counsel will implement the relevant actions required to resolve the matter, which could include disciplinary and/or other actions.
7. Where possible, the employee will be informed of the outcome of any investigations carried out and any actions taken, although confidentiality requirements may prevent this in some cases.
8. If there is evidence of criminal activity, the Chief Compliance Officer and General Counsel may consult external legal counsel and may report to the relevant law enforcement authorities. Playtech will ensure that any internal investigation does not hinder a formal police investigation.
9. Playtech will make every effort to address Personnel' concerns confidentially, fairly and professionally. If Personnel are not happy with the way in which a concern has been handled, they can contact any of the contacts listed in the section [How to Raise a Concern](#).

## 2.3 CONFIDENTIALITY AND ANONYMITY

Playtech will treat all concerns and disclosures made under this Policy in a confidential and sensitive manner and will treat any information with respect.

Personnel may choose to remain anonymous when raising a concern (subject to any local laws which prevent anonymous whistleblowing. If an employee wishes to remain anonymous when raising a concern (where permitted), they should make this clear upfront. Personnel may also contact Playtech's external Speak Up Line. The Speak Up Line will not attempt to trace their contact details and is legally forbidden from supplying an employee's details to Playtech without their explicit permission.

Playtech does not encourage Personnel to raise concerns anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from the employee who raised the concern. It is also more difficult to establish whether the allegations are credible.

For those reasons, Playtech encourages Personnel to include their name in any disclosures. Playtech will only make the employee's name known to those people who need to know it in order to investigate the allegation or otherwise as required by law.

It is possible that the investigation process may reveal the source of the information. Alternatively, the employee making the disclosure may need to provide a statement as part of the evidence required. In the event such disclosure is necessary, this will be discussed with the employee beforehand, and the information will only be communicated with the investigating lead charged with looking into and resolving the concern.

## 2.4 PROTECTION AND SUPPORT FOR SPEAKING UP

It is understandable that Personnel who speak up may be concerned about possible repercussions and/or retaliation against them.

Playtech aims to encourage openness and will support staff who raise genuine concerns under this policy, even if the concerns are mistaken.

Playtech will do everything in its power to ensure that Personnel who speak up do not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes bullying, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

No employee should threaten or retaliate against those who speak up in any way. Anyone who is involved in such conduct may be subject to disciplinary action.

Retaliation can include the following types of actions: (a) suspension, lay-off, dismissal or equivalent measures; (b) demotion or withholding of promotion; (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; (d) withholding of training; (e) a negative performance assessment or employment reference; (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; (g) coercion, intimidation, harassment or ostracism; (h) discrimination, disadvantageous or unfair treatment; (i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment; (j) failure to renew, or early termination of, a temporary employment contract; (k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income; (l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry; (m) early termination or cancellation of a contract for goods or services; (n) cancellation of a licence or permit; (o) psychiatric or medical referrals.

Under the EU Whistleblowing Directive (Directive (EU) 2019/1937), UK Enterprise and Regulatory Reform Act 2013 and other relevant national regulatory frameworks in the different jurisdictions, greater protection for those who speak up has been introduced, including increased liability for instances where Personnel experience retaliation as a result of speaking up. Employers can now be held vicariously liable for the retaliatory actions of their Personnel, and those Personnel who make threats, victimise, or degrade whistle blowers (for example, through malicious allegations and other abuses of this Policy) can be held personally liable for their actions.

If Personnel believe that they have suffered detrimental treatment, they should inform the Chief Compliance Officer, General Counsel, HR focal point or the Speak Up line immediately.

## 2.5 EXTERNAL DISCLOSURES

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. The law recognises that in some circumstances it may be appropriate for Personnel to report concerns to an external body such as a regulator; however, Playtech strongly encourages Personnel to seek advice before reporting a concern to external organisations.

Concerns may relate to staff as well as the actions of a third party, such as a customer, supplier, or service provider. In some circumstances, the law will protect Personnel if raising a matter with the third party directly. However, Playtech encourages Personnel to report such concerns internally first. Personnel should contact their line manager, HR, the Chief Compliance Officer and/or the General Counsel.

## 2.6 DATA PROTECTION AND RECORD KEEPING

Playtech will keep all necessary records of concerns received and actions taken to investigate and remediate them. All records will be kept confidential and stored securely.

Any personal data received in connection with a speak up report will be handled in a manner that is compliant with Playtech's [Data Protection and Privacy Policy](#).



## 2.7 TRAINING AND AWARENESS

Personnel will receive ongoing information about the mechanisms for speaking up, including the independent and confidential Speak Up line, and the protections provided to them under this Policy and through national laws and regulation. This information will be communicated via the new employee induction materials, company SharePoint, employee handbooks and compliance training modules.

Individuals responsible for supporting the Speak Up Policy, HR focal points and relevant Legal and Compliance staff, will receive training about their obligations under this Policy and the underlying regulatory requirements.

The Compliance team is responsible for ensuring that relevant information about the Speak Up Policy and mechanisms is included in annual compliance training. The HR function is responsible for ensuring that Personnel are provided with information about the Policy and speak up mechanisms.

# APPENDIX A - RELATED DOCUMENTS

- Business Ethics Policy
- Anti-Bribery and Corruption Policy
- Anti-Facilitation of Tax Evasion Policy
- Data Protection and Privacy Policy
- Anti-Money Laundering and Counter-Terrorist Financing Policy
- Human Rights Policy
- Human Rights and Modern Slavery Statement
- Wellbeing Policy