playtech

Safer Gambling Policy

Version 4.2

Board Approved

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CONFIDENTIAL

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1. Policy Statement

1.1 Playtech believes that safer gambling is a critical part of the long-term success of its B2B and B2C gambling operations as well as the sustainability of the industry as whole. Playtech believes that the gambling industry can provide a safe and responsible form of entertainment. While the majority of people who gamble do so in a responsible and safe manner, we recognise that there are risks involved whereby gambling can cause harm.

1.2 As a leading, global technology supplier to the sector, we recognise that we have an important role to play in developing technology solutions to address safer gambling challenges and raise standards across the industry. We believe that innovation in safer gambling is critical for keeping pace with regulatory, consumer and societal expectations to deliver a positive, safer online customer experience that people can trust. Innovation is critical, as we need to keep pace with expectations, reduce risk, maintain trust with our stakeholders and continue to be a viable business in the long term.

1.3 This is why Playtech has made safer gambling a core part of its long-term sustainability strategy. We have set out our ambition to be a trusted, global leader in safer products, data analytics and player engagement solutions to raise industry standards. Our commitments include:

- Increasing uptake of safer gambling technology, tools and solutions;
- Harnessing investment in R&D to advance the next generation of safer solutions and features, including responsible game design; and
- Strengthening safer gambling standards and technology across our operations.

1.4 In addition, this is underpinned by our commitment to adhering to safer gambling regulatory and licensing requirements in the countries in which we operate. Playtech is a proud signatory to the Betting and Gaming Council ('BGC') industry Safer Gambling Commitments, which aim to deliver long-term and fundamental change to how gambling companies empower, protect and support customers. The commitments cover 22 actions across five core areas, including:

- Preventing underage gambling and protecting young people.
- Increasing support for treatment of gambling harm.
- Strengthening and expanding codes of practices for advertising and marketing.
- Protecting and empowering customers (through product design and customer engagement).
- Promoting a culture of safer gambling.

2. Policy Application

2.1 This Policy applies to employees of Playtech Plc and its gambling-related subsidiaries where Playtech holds the operating licence ('Playtech Group'). 'Playtech' is used in this document to mean any entity in the Playtech Group.

2.2 Where local responsible gambling laws and regulations apply in any country in which Playtech operates, those laws and regulations must be followed in addition to the requirements of this Policy. 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.

2.3   Any breach of this Policy may result in disciplinary action. This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time.

3.   Policy Oversight

3.1   Playtech has appointed a member of the Board of Directors and of its senior management to oversee this Policy. Playtech's Risk and Compliance Committee has overall responsibility for ensuring this Policy complies with Playtech's legal and ethical obligations, and that all those under its control comply with the Policy. The Risk and Compliance Committee is also responsible 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.

3.2   At the operational level, each relevant division is responsible for transposing and aligning this policy into operational procedures and overseeing the implementation, monitoring and effectiveness of those procedures. In addition, they are responsible for ensuring relevant staff are aware, trained and adhering to operational procedures.

3.3   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 Compliance.

4.   Training

4.1   Employees must be aware of their obligations and responsibilities relating to safer gambling. This information is delivered to all employees as part of induction and annual compliance training.

4.2   Employees in operational and customer-facing roles must also participate in additional safer gambling training. This includes, but is not limited to, Customer Service, chat moderators, VIP Customer Managers and Personal Management Licence Holders. These employees will be trained on a number of elements of safer and problem gambling including:

- Regulatory and licensing requirements.

- How to recognise and interact with people exhibiting behaviour that is indicative of problem gambling.

- How to manage and escalate issues that relate to their respective responsibilities.

4.3   Safer gambling training is conducted face-to-face or online, as appropriate.

4.4   Furthermore, the relevant operational and/or functional divisions shall maintain a written record of all training provided and awareness measures taken.

5.   Safer Gambling in B2C Operations

5.1   In divisions where Playtech is operating B2C operations in the retail and/or online environment and holds an operating license, the relevant Head of Operations is responsible for ensuring that robust procedures and management controls are in place to ensure the operations are complying with all relevant licensing codes and conditions of practice.

5.2   In addition, B2C operations must implement a plan to adhere to voluntary codes of conduct including the industry Safer Gambling Commitments.

5.1. B2C Operational Procedures

5.1.1   B2C operational procedures and systems should cover all aspects of safer gambling and, at a minimum, include the following:

- An accountable, designated individual within the operations with responsibility for ensuring that gambling-related harm is minimised.

- Player education and awareness programmes about safer gambling including visible, accessible safer gambling information for customers.

- Procedures for implementing responsible gambling tools – including provision of existing and new tools to support safer gambling including information about blocking software, bank blocking tools and national self-exclusion schemes.

- Player risk assessments to identify at risk and problem gamblers using:

  - Customer registration information.

  - Self-exclusion and time out data.

  - Gameplay data.

  - Affordability.

  - Data on complaints and disputes in place to identify individuals who may have a gambling problem.

- Customer interaction procedures which are designed to be based on a customer's risk profile. The risk that a customer might be experiencing harm from gambling must be placed above commercial considerations including when dealing with high spending/VIP customers.

- A procedure for responding to third party notice of a customer experiencing harm from gambling.

- Logging of customer interactions and complaints.

5.2. Safer Gambling Controls for VIP/Higher Value Customers ('HVC')

5.2.1   For HVC or VIP customers, B2C operations must undertake '**full customer assessments**'[1] before offering any VIP/HVC incentives, rewards or special treatment. These checks will be regular and ongoing and commercial pressures will never override welfare considerations. Teams that operate HVC/VIP Rewards Programmes will not receive remuneration or bonuses based on an individual's loss and/or spend.

5.2.2   18 to 24-year olds will only be considered for joining VIP/HVC schemes in exceptional circumstances and with the sign off of a senior manager who is also a PML holder.

5.2.3   Existing VIP/HVC scheme members aged between 18-24-year-old will only be allowed to stay as VIP's following a full customer assessment and with senior management sign-

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[1] Full customer assessments include checks on the sustainability of player spend, a safer gambling check, a negative information review and KYC check.

off. Senior management is defined as an individual holding a personal management license (PML).

5.2.4   VIP/HVC reward programmes will maintain full audit trails and have clear lines of senior oversight and accountability for their conduct.

5.2.5   VIP/HVC reward programmes will be conducted with consistent, clear and transparent good practice to prevent gambling-related harm.

6.   Retail Operations

6.1   Where Playtech is operating retail operations, the relevant Head of Operations is responsible for ensuring that robust procedures and management controls are in place to ensure the operations are complying with all relevant licensing codes and conditions of practice.

6.2   Retail operational procedures should include systems and controls to identify at risk and problem gamblers based on all available information, including:

- Gaming machine data and/or implementing effective systems to track registered play on gaming machines.

- Self-exclusion data.

- Data on complaints and disputes.

- Staff observations of the customer's behaviour and any interactions with them.

7.   Advertising and Marketing

7.1   Where Playtech operations are involved with marketing and advertising of gambling products and services to consumers, we are committed to ensuring that promotions and terms and conditions are transparent, visible and clear to players, and that game design and related promotions do not have particular appeal to children, young people and other vulnerable individuals.

7.2   Advertising and promotions must be compliant with the relevant regulatory and advisory codes of practice including the Licensing Conditions and Codes of Practice (LCCP) and Codes issued by the Advertising Standards Authority (ASA) and the Industry Group for Responsible Gambling (ICRG).

7.3   Customer risk profiles must be taken into consideration when deciding on the type and frequency of marketing communications. This can also apply to land-based operators where the operator holds customer data and sends the customer marketing communications.

7.4   When using affiliates, operations must have effective systems and controls for overseeing affiliates and ensuring they are complying with regulatory and licensing requirements.

7.5   For advertising, promotions and marketing online, operations should:

- Define a common list of industry negative search terms (extended to affiliates) to be shared with search engines, along with a list of sites for suppression for the purposes of de-targeting in display so that advertising does not appear on sites with content that could have particular appeal to under 18s or vulnerable people, all frequently reviewed, updated and shared on an on-going basis;

- Use of customer data to de-target paid-for ads from vulnerable groups across social media platforms, and work with the platforms to identify ways to do this more easily and effectively;

- Implement +25 age-targeting in social media and "Pay Per Click" advertising where platform facilities permit, to increase confidence in the social media platform's own age-gating, which is currently based on self-certified data and relies on the honesty of the user;

- Implement consistent voluntary age-gating on YouTube channels and content;

- Adopt good practice guidelines for responsible digital marketing; and

- Adopt and roll out to all affiliates a code of conduct which is consistent with industry best practice.

7.6   For more information on advertising and marketing, see the Responsible Advertising and Marketing Policy.

8.   Safer Gambling in B2B Operations and Services

8.1   As a leading software and technology provider to the gambling sector, Playtech has an important role to play in raising safer gambling standards across the industry. Our software provides tools to enable our players to gamble safely and responsibly.

8.2   Playtech provides a platform and range of technology tools to enable our licensees to implement safer gambling controls, interact with customers and promote a safer customer journey. Playtech is investing, developing and offering safer gambling tools, data and services that can help raise industry standards to:

- Promote safer and responsible play.

- Empower licensees and players with advanced customer engagement and responsible gambling tools to reduce harm.

- Improve the quality and use of data to reduce harm.

- With the BetBuddy acquisition in 2017, we are bringing machine learning and artificial intelligence software into Playtech's IMS platform.

8.3   BetBuddy represents the next step in responsible gambling initiatives as it spots patterns of behaviour through data analytics and these patterns can point to an at-risk user. The machine learning part of the technology ensures that it gets increasingly intelligent over time to spot new techniques. This could range from size or volume of bets through to card declines. Consequently, BetBuddy's integration into our backend enables Playtech to continue to offer licensees advanced responsible gambling products and services and incentivise safer gambling through gamification.

8.4   On the other hand, within its iPoker and Live casino offering, Playtech provides licensees with relevant information about customers that may be exhibiting at-risk and/or problematic behaviour. The staff within these divisions maintains a designated focal point to oversee the responsible gambling procedure and ensure that at risk cases are appropriately escalated to the relevant licensees. Procedures for tracking and escalation reporting to licensees are maintained and if new opportunities to improve these procedures are identified and followed up.

9. Safer Gambling: Ethics and Artificial Intelligence, Data Profiling and Automated Decision Making

9.1   As part of Playtech's efforts surrounding the developments of Artificial Intelligence (AI) based opportunities and technologies and the company wide use of Data Profiling and Automated Decision Makings (ADM), Playtech is committed to enforce privacy by design across systems, as well as continuous processes to build trust with users as much as relevant stakeholders and regulators. We will always endeavour to ensure that our AI/ADM based products and services are developed and designed to enable compliance with regulations and ethical standards.

9.2   We will always aim to stay at all times transparent and accountable and minimize the data used whilst embracing good data stewardship and governance processes to ensure we are delivering meaningful AI/ADM and Profiling solutions that help our clients and players tackle any of the new challenges ahead.

9.3   Playtech will at all times endeavour to assess the impact of incorrect AI based predictions and, when reasonable, design systems and software with the capability for human intervention for all AI and ADM/Profiling processes in mind.

10. Responsible Game Design and Labelling

10.1   Playtech is committed to delivering products and a player environment to protect, empower and make it easy for customers to play safely and stay in control. As a content and product provider to the industry, Playtech is committed to the following principles:

- Build understanding, awareness and capabilities amongst our game designers, content studios and product developers so they are equipped to identify and assess game features and attributes for potential harm to at risk or vulnerable players and implement new frameworks for game design and labelling. Playtech will build capabilities amongst its game designers to ensure they can better understand gambling-related harm in order to integrate safety into game design as well as contribute to new ideas in this arena.

- Research and test ways to understand, identify and assess whether there are high-risk features in our games that should be removed, moderated or compensated-for by strong safer gambling features applied at the game/player-level (such as enforced breaks in play).

- Apply game level insights and data to produce more effective, clear and consistent product labelling and product information to help licensees offer personalised information to players and enable players to make informed choices about game and product risk.

- Collaborate with industry peers and academic community on responsible game design; contributing to the development of an industry wide approach for game design and labelling. We are also committed to sharing our research and insights with stakeholders; including the research and regulatory community.

10.2   As gambling is inherently risky, Playtech is committed to developing products to minimise the risks to players by ensuring they help to support safer gambling. Our principles are built around the following themes:

- Game Characteristics
- Informed Player Choice
- Enhancing Control
- Safe and Fair Environment
- Governance and Continuous Improvements

10.3   Playtech will continuously seek to make our products safer by:

Game Characteristics

- Establishing and maintaining a dedicated Sustainable Product & Game Design Working Group, comprised of experts from product, technology and game studios.
- Conduct and contribute to industry research and follow an evidence-based approach to development.
- Where we develop innovative game features or elements, we will review them internally and identify any safer gambling considerations and mitigations, even if it means the game takes longer to reach the market. This will also include supporting post-release evaluations in collaboration with the B2C operators who have access to player data.
- Supporting the testing and evaluation of new features where there are uncertain but possible implications for player risk in collaboration with the industry trade bodies and B2C operators who have access to player data (where intellectual property rights are not infringed).
- Deploy training to games development staff on the principles of safer gambling in the context of game design.

Informed Player Choice

- We will provide information to our partners and players that clearly explain how products work and encourage safer play.
- Game operation and rules, mathematical properties such as expectation and risk, and best strategies must be clearly set out and readily accessible so that licensees can provide this to the customers.
- Games will be designed to be clear and transparent to players and will not mislead them about the likelihood of winning or how they work.

Enhancing Control

- We will look to continuously innovate and build new safer gambling products and features and improve the level of control offered to players whilst gambling.
- Games will be designed and tested robustly to ensure they operate according to their rules and provide players with fun and fair games that they can trust.

Safe and Fair Environment

- We will ensure our games do not target people under the age of 18 (eighteen) and/or comply with local requirements related to legal age of gambling.

- We will continually monitor the processes and technology use to prevent access to our platforms by vulnerable people. We will strengthen these controls where we identify more robust and effective solutions.

- We will develop marketing assets related to games that uphold their responsible marketing obligations.

- We will provide licensees with the information so they can ensure the marketing of and terms and conditions of games are clearly explained and do not mislead players.

Governance and Continuous Improvements

- We will review the above principles regularly and in line with industry and regulatory developments; recognising that the research base and player requirements around sustainable content are continually developing. We expect these principles to be continuously improved.

11. Safeguarding Employees

11.1   The health, safety and wellbeing of Playtech employees is of paramount importance. As part of this commitment, Playtech consistently works towards protecting vulnerable or at-risk employees, including those exhibiting, and/or potentially affected by, gambling-related harm.

11.2   Playtech will provide employees with information about gambling-related harm and relevant sources of internal and external support. This information will be accessible and visible to employees in case they are concerned about their gambling behaviour, or that of a colleague or family member.

11.3   The local HR focal points will work with the nominated safeguarding lead to ensure that employees and team leaders are provided with training on how to identify staff exhibiting at-risk gambling behaviour, the procedures for escalating concerns and how best to support those employees.

11.4   The HR departments in the countries where Playtech operates will establish and maintain procedures for supporting employees affected by gambling-related harm in cases where HR:

- observes staff experiencing gambling-related harm;

- is approached by an employee about a colleague experiencing gambling-related harm.

- is notified by a third party (friend, family member, etc.) about an employee suffering from gambling-related harm.

12. Gambling on Playtech Content, Platforms and Licensee Sites and Platforms

12.1. Real Money Games

12.1.1   Employees are prohibited from gambling on any of Playtech's platforms and/or content (including poker, bingo, casino and sports betting), and whether on a Playtech managed site or on a licensee site, at any time for any purpose other than as required

for work pursuant to their employment with the relevant Playtech entity ("Non-Work Purposes"). If an employee is required to play for work purposes, then the employee must conform to all internal departmental policies surrounding such activity and permission must be sought in accordance with the paragraph "Approvals Process for Work Purposes" below.

12.1.2   Should personnel wish to gamble for Non-Work Purposes, they should make every effort to familiarise themselves with Playtech's content, platforms and licensees to ensure they are compliant with this policy.

12.1.3   A list of the URLs for sites which are operated and managed by Playtech from time to time ("List of Playtech Operated Sites") can be found by clicking the link https://confluence.playtech.corp/display/COMPLIANCE/Playtech+Operated+Sites, or by following these instructions "go to web > launch URL> view list". If unable to launch the URL, contact Compliance.Declaration@Playtech.com. Given the above, employees are of course prohibited from becoming a member and/or gambling on any such sites unless required to do so as part of their job role/duties. For the avoidance of doubt, the List of Playtech Operated Sites are only the sites currently managed and/or operated by Playtech directly, and does not provide an exhaustive list of all sites on which Playtech's platform and/or content may be used (for example licensee operated sites). It is the responsibility of the employees to familiarise themselves with Playtech's platform, content and licensees to ensure that they do not gamble using any of Playtech's platforms or content on any other licensee sites.

12.1.4   In exceptional cases, where an employee is gambling for Non-Work Purposes and inadvertently finds that they are playing on a Playtech platform or game in breach of this policy and subsequently wins real money, they must immediately notify their manager and the Compliance team via the Compliance Management Office (CMO) at Compliance.Declaration@Playtech.com. Compliance will then review the situation on a case by case basis, and in some circumstances it may be deemed inappropriate for the employee to receive any of the winnings.

12.2. "Not For Money" Games

12.2.1   Employees are permitted to play on 'not for money' games on any of Playtech's platforms and/or content at any time, whether for Non-Work Purposes or otherwise.

12.3. Approvals Process for Work Purposes

12.3.1   Should employees be required to play any real money games on any of Playtech's platforms or content for work purposes (for example for the purposes of reviewing or testing content on a licensee's site and/or playing and reviewing games with real money provided by the relevant Playtech entity for the purposes of market research or insights) ("Work Purposes") the individual must obtain explicit written permission from their manager prior to playing.

12.3.2   Test Accounts set up and funded by Licensees are only subject to departmental oversight and do not require registration or approvals via compliance.

12.3.3   The relevant manager (or department head) must keep a departmental log of all authorised individuals and their test accounts in line with their departmental policy and, additionally, the relevant manager shall be required to log such information in the centralised Convercent database directly. If the relevant manager has any queries regarding the Convercent database, he/she should contact the Compliance

Management Office within Compliance by emailing
Compliance.Declaration@Playtech.com.

12.3.4   If an employee is playing any real money games on any of Playtech's platforms or
content for Work Purposes and wins a significant amount of money (over 500
euros/GBP), the employee must immediately notify their manager and the Compliance
team via the Compliance Management Office at
Compliance.Declaration@Playtech.com. Compliance will then review the situation on
a case by case basis and will notify the employee of the appropriate next steps to be
taken. Until such time as Compliance has informed the employee of such next steps,
the employee shall not take any further action with regard to such winnings. For the
avoidance of doubt, the employee shall not be entitled to keep any of the winnings.

Note: Employees should not create test accounts using personal accounts or funds.
Any employee with a personal gaming account is prohibited from playing
on Playtech products for personal gain.

12.4. Family Members

12.4.1   The prohibition above on playing on Playtech's platforms and content does not extend
to family members of employees, but employees are required to notify their manager in
the event that they become aware that a member of their family wins €2,000 or more
on Playtech's platform or content, subject to obtaining the family member's prior
consent.

12.4.2   For the purposes of this paragraph, "family members" shall include an employee's
spouse, civil partner, children, parents, grandchildren, step-child, brother, sister and
grandparents.

13. Supporting Research, Education and Treatment

12.1   Playtech is committed to providing strategic, financial and in-kind support to charities
dedicated to delivering education, prevention and treatment of problem gambling.

12.2   Each year, Playtech allocates a donations budget dedicated to research, education
and treatment and then reviews the effectiveness and outcomes from its donations.

12.3   Eligible organisations can include charities, research organisations, social enterprises,
academic institutions, public-private partnerships and non-profit organisations.

12.4   Before donating to an organisation, Playtech conducts due diligence and engages
with the organisation(s) to jointly define programme scope, metrics and KPIs, and a
delivery plan.

12.5   Programmes undergo a review process to assess programme effectiveness.

12.6   Playtech currently supports a number of organisations including:

- GambleAware, www.begambleaware.org
- Gambling Therapy, https://www.gamblingtherapy.org/ - for International online
support and therapy services in many languages
- GamCare, http://www.gamcare.org.uk/

- Gordon Moody Association, https://www.gordonmoody.org.uk/
- YGAM, https://www.ygam.org/
- Spanish Responsible Gambling Advisory Council,- https://www.ordenacionjuego.es/en/consejo-asesor
- BGC, https://bettingandgamingcouncil.com/safer-gambling/

14. Regulatory and Stakeholder Engagement

13.1   Playtech actively engages with regulators and policymakers on a wide range of compliance and public policy issues. Our Regulatory Affairs and Compliance Team monitors current and emerging policies, as well as any changes and advancements in regulations within the industry. Playtech is part of the Spanish Responsible Gambling Advisory Council, which was recently created as a working group in which experts of recognised prestige and experience participate to advise and improve responsible gaming measures.

APPENDIX A - RELATED DOCUMENTS

- UK B2C Safer Gambling safer gambling operational procedures
- Snaitech B2C safer gambling operational procedures
- Responsible Advertising and Marketing Policy
- ASA and CAP guidance (UK)
- Industry Group for Responsible Gambling – Gambling Industry Code of Socially Responsible Advertising - 6th Edition October 2020
- GamCare standard and certification standards
- iPoker responsible gambling procedure
- Eurolive responsible gambling procedure
- BGC Industry Safer Gambling Commitments
- BGC Game Design and Product Code of Conduct
- BGC High Value Player (VIP) Code of Conduct