



# **Business Ethics Policy**

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# 1. About this Policy

## 1.1. Policy Statement

1.1.1. Playtech is committed to engaging in business in a responsible, ethical and sustainable manner and to playing a positive role in the communities in which it operates. We take a zero-tolerance approach to conduct that would have the effect of breaching our ethical standards, legal and/or regulatory obligations. This Business Ethics Policy sets out Playtech's standards of business conduct, its approach to corporate governance, its commitments to its employees, and its approach to being a sustainable company. It also outlines the expectations of employees to uphold ethical standards and responsible business practices.

## 1.2. Purpose of this Policy

1.2.1. The purpose of this Policy is to:

- set out Playtech's responsibilities, and the responsibilities of those working for Playtech, in observing and upholding Playtech's position on ethics; and
- provide information and guidance to those working for Playtech on how to behave ethically. Playtech's Code of Conduct provides an overarching checklist of expected behaviours for guidance.

## 1.3. Application of this Policy

1.3.1. This Policy applies to the Playtech group of companies, which means Playtech Plc together with every subsidiary of Playtech Plc (collectively referred to as 'Playtech' in this Policy).

1.3.2. 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, 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.

1.3.3. Any breach of this Policy may result in disciplinary action for Playtech Personnel. Playtech may terminate its relationship with other individuals or organisations working on its behalf if they breach this Policy. Deliberate or repeated non-adherence to this Policy will be treated as misconduct and may result in disciplinary action, up to and including dismissal.

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

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

1.3.6. This Business Ethics Policy will be provided to all new Personnel at induction. The Policy will also be made available on Playtech's secured shared sites. The Compliance

team will work with HR to ensure that Personnel are reminded of the Ethics Policy at least once a year.

1.3.7. Personnel in the Financial division are also required to comply with Finalto's 'Treating Customers Fairly Policy' and the Financial divisions' Code of Conduct.

1.3.8. Exceptions to this Policy are not permitted.

## **1.4. Oversight of this Policy**

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

1.4.2. Playtech's Risk and Compliance 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.

1.4.3. 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.

1.4.4. 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.

## **1.5. Compliance Management**

1.5.1. Playtech's Risk and Compliance Committee will review the use, effectiveness and implementation of this Policy on an annual basis, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

1.5.2. 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 team.

1.5.3. 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 the Risk and Compliance Committee or the board of directors.

## **2. Business Conduct**

### **2.1. Development, Approval, Manufacture, Sales and Marketing of Products**

2.1.1. Playtech complies with all laws, standards and regulations applicable to its products and services (such as quality regulations and standards).

2.1.2. Playtech follows all laws, regulations and codes of practice regarding the promotion, marketing, advertising and sales of its products and services, including ensuring that all statements are truthful, not misleading, and are consistent with regulatory approvals for its products.

- 2.1.3. Playtech upholds best-practice responsible gambling standards. Personnel must comply with Playtech's Safer Gambling Policy and Responsible Advertising Policy (where applicable).
- 2.1.4. Playtech adheres to applicable industry standards, such as information security standards and certification of gambling products.

## 2.2. Treatment of Customers

- 2.2.1. Playtech treats its customers (both consumers and businesses) fairly.
- 2.2.2. Personnel should uphold Playtech's values in their interactions with customers, by striving for excellence and behaving with honesty, integrity and respect.
- 2.2.3. If a customer's business practices compromise Playtech's own values, this should be raised with the Compliance team, who will decide on the appropriate actions to take.

## 2.3. Treatment of Suppliers

- 2.3.1. Playtech acts fairly and impartially in negotiations with its suppliers and service providers.
- 2.3.2. Playtech treats its suppliers and service providers fairly and pays them in accordance with the terms agreed.
- 2.3.3. Playtech strives to work with suppliers and service providers who also value and demonstrate high ethical standards in their business practices.

## 2.4. Anti-bribery and Corruption Laws

- 2.4.1. Playtech has a zero-tolerance approach to bribery and corruption. It complies with local and international anti-bribery laws and ethical standards prohibiting bribery and corruption in all jurisdictions in which it does business.
- 2.4.2. Personnel must comply with Playtech's Anti-Bribery and Corruption Policy. This includes obligations which strictly prohibit the giving or receipt of bribes, kickbacks, facilitation payments, illegal payments or any other thing of value that is intended to induce or reward a person (private or public official) to act improperly, whether provided directly or through a third party.

## 2.5. Anti-money Laundering & Counter-terrorist Financing Laws

- 2.5.1. Playtech complies with all applicable laws relating to money laundering and terrorist financing in the jurisdictions in which it operates.
- 2.5.2. Personnel are required to comply with Playtech's Anti-Money Laundering and Counter-Terrorist Financing Policy.

## 2.6. Trade Sanctions Laws

- 2.6.1. Financial and trade sanctions are used to combat terrorism and to discourage governments, regimes or individuals from acting in ways denounced by the international community or individual nations.

- 2.6.2. Playtech respects the financial and trade sanctions and import and export restrictions imposed by government that are applicable to its activities.

## 2.7. Gifts and Entertainment

- 2.7.1. Playtech permits reasonable and appropriate hospitality or entertainment to be given to or received from third parties, subject to certain conditions being met.
- 2.7.2. Personnel must comply with Playtech's Gift and Hospitality Policy which is set out within Playtech's Anti-Bribery and Corruption Policy.

## 2.8. Taxation

- 2.8.1. Playtech manages its tax affairs responsibly whilst also fulfilling its commitment to shareholders to maximise value through tax-efficient management.
- 2.8.2. Playtech implements appropriate tax policies, procedures and compliance controls to meet its legal obligations to pay tax, to ensure the integrity of its filings and the submission of timely and accurate tax payments in all countries in which it does business.
- 2.8.3. Personnel are required to comply with Playtech's Anti-Facilitation of Tax Evasion Policy. This includes obligations on personnel to ensure that their actions do not involve Playtech in tax evasion and do not knowingly facilitate the evasion of any tax by any third party, such as a customer or supplier.

## 2.9. Political and Charitable Contributions

- 2.9.1. Contributions or payments to political parties, candidates, organisations, or campaigns are not permitted. This restriction includes sponsorship of events and gifts in kind.
- 2.9.2. Playtech does permit charitable donations, but only where the donation is: (i) made to a registered charity; (ii) legal and ethical under local laws and practices; and (iii) approved of by the Chief Compliance Officer or his designee. Further information about policies and procedures for donations to charitable organisations can be found in Playtech's Community Investment Policy.

## 2.10. Third Country Payments

- 2.10.1. No payments of any kind should be made to a third party in any country other than the country from which the product or service was provided, or in which the recipient has a substantial place of business.
- 2.10.2. For guidance on 'third country' payments, contact Playtech's Compliance or Finance department or see Playtech's Anti-Money Laundering and Counter Terrorist Financing Policy.

## 2.11. Public Procurement

- 2.11.1. Public authorities are subject to local laws governing how they procure and provide services. As a supplier of services, Playtech is required to comply with these laws.



- 2.11.2. Personnel who are involved in tender processes, or who offer to provide products and services under a contractual agreement to a public authority, must understand and follow the rules of public procurement.
- 2.11.3. For guidance on public procurement processes, contact Playtech's Compliance team.

## 2.12. Competition

- 2.12.1. Antitrust and competition laws promote fair competition and protect consumers from unfair business practices. These laws address matters such as illegal agreements between competitors aimed at preventing or restricting free competition, price fixing and unfair trade practices.
- 2.12.2. Playtech complies fully with all applicable antitrust and competition laws.
- 2.12.3. Personnel are responsible for dealing fairly with customers, suppliers, competitors and other third parties and must avoid taking unfair advantage through manipulation, concealment or misrepresentation of facts or other unfair practices.
- 2.12.4. For guidance on antitrust and competition laws, contact Playtech's Legal department.

## 2.13. Privacy

- 2.13.1. Playtech collects and stores personal information about its Personnel, business partners, customers, consumers, suppliers, and others in the course of its business, such as name, date of birth, addresses and financial information.
- 2.13.2. Playtech complies with local and international laws on data protection and security and has implemented a [Data Protection and Privacy Policy](#). This Policy obliges Playtech to collect personal data only for legitimate business purposes, to share personal data only with those who are allowed access, to protect data in accordance with security policies, to retain data only for as long as necessary, and to ensure that third parties with access to data are contractually obliged to protect it.
- 2.13.3. For guidance on data protection or privacy, contact Playtech's Privacy department.

## 2.14. Sustainability and Environmental Laws and Regulations

- 2.14.1. Playtech is committed to reducing the environmental impacts of its operations, being energy efficient, managing environmental risks and pursuing sustainability initiatives such as reducing waste and promoting recycling.
- 2.14.2. As part of Playtech's five-year sustainability strategy it has made a commitment to reduce its carbon footprint by 40%.
- 2.14.3. Personnel are encouraged to support local initiatives aimed at reducing environmental impacts including energy efficiency, plastic reduction and water management efforts.
- 2.14.4. Further information about Playtech's sustainability and environmental commitments can be found in the [Group Environment Policy](#).

## 2.15. Local Communities

- 2.15.1. Playtech is committed to citizenship and community involvement and contributes time, skills, in-kind services and money to charitable organisations and causes.
- 2.15.2. Personnel are encouraged to contribute their time and support to local communities and charitable organisations.
- 2.15.3. For guidance on community initiatives, see [Playtech's Community Investment Policy](#) or contact the [Corporate Social Responsibility](#) function.

## 3. Financial Integrity and Protection of Company Assets

### 3.1. Accuracy of Company Records and Reports

- 3.1.1. By law, Playtech's financial records must be honest and accurate. Government regulatory authorities, institutional investors, investors and rating agencies rely on financial information being reported truthfully, accurately and in a timely manner. Furthermore, inaccurate financial reporting could undermine shareholder confidence, impact Playtech's reputation and subject Playtech to fines and penalties.
- 3.1.2. Playtech keeps accurate books and records and does not make false or artificial entries for any reason. This is crucial to maintain the integrity of Playtech's financial reporting, to support internal decision making and to maintain relationships with stakeholders.
- 3.1.3. Playtech adopts generally-accepted accounting principles, which record entries appropriately and prevent the establishment of 'off the books' or secret accounts, or the creation of documents which do not properly and fairly record the transactions to which they relate.
- 3.1.4. All payments or usage of company funds must be reviewed and approved by the appropriate manager. All requests for payments must be clearly and accurately described and supporting documentation provided. Proceeds must be used only for the requested and approved purpose.
- 3.1.5. Personnel must follow Playtech's procurement Policy and purchasing processes.
- 3.1.6. Personnel must comply with all applicable record management policies. As a minimum, all business records must:
  - fully and accurately describe the transaction being recorded;
  - comply with applicable accounting standards;
  - be supported by accurate documentation; and
  - be promptly reported.
- 3.1.7. When submitting expenses, Personnel must comply with Playtech's expenses process.
- 3.1.8. Playtech implements a system of internal controls to ensure compliance with its policies and adopted principles.

## 3.2. Use of Company Assets

- 3.2.1. Personnel rely on company assets, such as computers, mobile devices, information technology hardware and software, facilities, intellectual property and supplies to complete their work.
- 3.2.2. Playtech regulates the use of company assets to ensure that company property is used in a proper, professional and lawful manner.
- 3.2.3. Personnel are required to:
- use company assets for professional purposes only, that is, only as necessary to carry out their duties and responsibilities or as otherwise authorised by the company;
  - not use company assets in any way that is illegal, immoral, offensive, racist, sexually explicit and/or contrary to Playtech's values;
  - not use company assets for harassing, intimidating or threatening others, or to engage in other illegal activities (such as activities related to pornography, terrorism, espionage, theft or drugs, etc.);
  - keep all electronic devices provided by Playtech (computer, laptop, mobile phone, etc.) secure;
  - keep all confidential information (such as information regarding Playtech's activities, suppliers or clients) strictly confidential, and never disclose it to third parties; and
  - never store such information on any local disk or external device (such as a USB stick) without the consent of their line manager.

## 3.3. Insider Trading and Compliance with Securities Laws

- 3.3.1. As a listed company, by law, Playtech is required to publicly disclose certain information such as revenues, significant acquisitions and regulatory matters. Playtech is responsible for reporting this information in a fair, complete, accurate and timely way.
- 3.3.2. Playtech complies with applicable securities laws in the jurisdictions in which it operates. Most countries prohibit people from either using inside information for personal gain or disseminating it without authorisation.
- 3.3.3. Inside information is information about Playtech (or any of its licensees) that has not been made public, and which would be likely to have a significant effect on the price of Playtech securities (that is, shares) (or those of its licensees) if it were released to the public. Inside information includes but is not limited to:
- possible mergers, acquisitions, divestitures, and joint-ventures;
  - preparation by Playtech to issue new securities;
  - changes in key management;
  - earnings and dividends;

- financial, sales and other significant internal business forecasts; and
  - significant litigation, government investigations, or regulatory actions.
- 3.3.4. Personnel may become aware of inside information in the course of their roles at Playtech before it has been released to the public. Personnel who have become aware of such information must not:
- buy or sell Playtech securities;
  - buy or sell securities of any other company using important non-public inside information that has become available to them in the course of their role at Playtech;
  - 'tip' others to trade;
  - recommend that family, friends, or others buy or sell Playtech securities or the securities of other publicly listed licensees; and
  - disclose inside information to anyone, including other Personnel (unless they need the information to do their job).
- 3.3.5. Personnel who know or suspect they, or another, may be at risk of, or have engaged insider trading, must notify the Compliance or Legal teams.

## **3.4. Respect for Trade Secrets and Confidential Information**

- 3.4.1. Playtech respects trade secrets and confidential information belonging to other companies and individuals. Information about competitors should be sought from the public domain only; the inappropriate collection of others' proprietary information is not permitted.
- 3.4.2. Discussions of competitive information with Personnel of competitors should be avoided in all circumstances, including industry meetings.
- 3.4.3. Personnel should be truthful and never misrepresent who they are or where they work in an effort to learn about competitors.

## **3.5. Intellectual Property**

- 3.5.1. Intellectual property ('IP') rights, which include patents, trademarks, copyrights, design rights, know-how and trade secrets, product designs, inventions, brand names and logos, are key to Playtech's business and must be protected.
- 3.5.2. Personnel must take care to respect Playtech's IP and to employ appropriate measures to protect such intellectual property rights.
- 3.5.3. Any suspected theft or unauthorised use of Playtech's IP must be reported immediately to Playtech's Legal team.
- 3.5.4. Playtech does not tolerate any unauthorised use, theft or misappropriation of any third party intellectual property rights.

## **4. Commitments to Personnel**

### **4.1. Preventing Harassment**

- 4.1.1. Harassment is any unwelcome or offensive language or behaviour directed at another person based on any identifying personal characteristic. Harassment includes unwelcome sexual advances or innuendos, offensive jokes, derogatory slurs and offensive visual images. Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or even a compliment could lead to or contribute to harassment.
- 4.1.2. Playtech does not tolerate harassment and is committed to providing a workplace that is free from harassment, bias, intimidation, bullying or any other offensive conduct.
- 4.1.3. Personnel who believe that they have been harassed should raise the matter with the relevant Human Resources Manager, who will arrange for it to be investigated impartially, confidentially and without delay.

### **4.2. Non-discrimination**

- 4.2.1. Playtech values all its Personnel for their contribution to the business. Personnel will be treated fairly and respected for their contributions.
- 4.2.2. Playtech does not tolerate discrimination in recruitment or promotion based on characteristics of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor. All employment decisions will be based on merit, considering qualifications, skills and achievements.
- 4.2.3. Playtech recognises its responsibility to adopt fair and inclusive practices, to develop mutual trust and respect, to help achieve an inclusive and supportive working environment and to promote good working relations.

### **4.3. Diversity and Inclusion**

- 4.3.1. Playtech recognises that different thoughts, abilities, experiences and individual characteristics make its work environment richer and lead to better business decisions. Playtech has a globally diverse and inclusive culture, which embraces different cultures, genders, ethnicities, social backgrounds and beliefs.
- 4.3.2. Playtech and Personnel should encourage tolerance of others and respect for diversity.

### **4.4. Labour Standards**

- 4.4.1. Playtech complies with all policies, laws, regulations and standards relating to conditions of employment, including those concerning hours, wages, overtime and other working conditions. Such laws will apply together with the terms of the written agreement between Playtech and Personnel, for example, the contract of employment.

- 4.4.2. Child labour (persons under age of 15, unless specified otherwise by law) and illegal, abusive or forced labour (including indentured labour, bonded labour, servitude, slavery and human trafficking) is not tolerated by Playtech in its own business or in the business of its suppliers or third-party business partners.
- 4.4.3. Individuals must not be coerced to work by violence, intimidation or other means. Individuals are free to terminate their employment by giving reasonable notice as determined in their contract of employment.
- 4.4.4. Playtech respects the rights of workers to associate freely and bargain collectively where permitted under relevant laws. Workers may discuss working conditions with management without fear of retaliation. Playtech will respect the rights of workers to join an association and to appoint representatives.

## 4.5. Employee Engagement

- 4.5.1. Playtech recognises the importance of an engaged, high-performing workforce. To engage Personnel, Playtech implements:
- recognition programs to support and inspire the personal achievements of Personnel;
  - opportunities to build and grow careers through structured performance management planning;
  - professional training and development opportunities;
  - employee assistance programs;
  - ongoing support and guidance from their managers; and
  - support for work/home balance and flexible working arrangements.

## 4.6. Employee Wellbeing

- 4.6.1. Playtech is committed to promoting the health and well-being of its Personnel and providing a safe and caring working environment. All Personnel are entitled to equal rights of protection.
- 4.6.2. Playtech also recognises that its industry creates a sensitive environment for those at risk of, or experiencing, gambling-related harm. Playtech has a duty to ensure that policies, training and support are available and promoted to Personnel.
- 4.6.3. Playtech's Wellbeing Policy outlines the company's approach for protecting Personnel's health, wellbeing and human rights, enabling them to be free from harm, abuse and neglect. Safeguarding concerns may arise for vulnerable Personnel, including those affected by gambling-related harm, mental health concerns, learning disabilities, sensory/physical disabilities, social isolation as well as other conditions.
- 4.6.4. The Policy also provides an overview of how Playtech will support Personnel 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.
- 4.6.5. Playtech has established global and local wellbeing leads who have primary and day-to-day responsibility for the Wellbeing Policy. Each entity within the Playtech group of companies (and its internal HR 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 the [Wellbeing Policy](#).

## 4.7. Health & Safety

- 4.7.1. Playtech is committed to creating and maintaining a safe and healthy work environment for all Personnel working within, or visiting, its premises.
- 4.7.2. Playtech complies with all applicable workplace safety and industrial hygiene policies, laws, regulations and standards.
- 4.7.3. Playtech has a duty to put suitable arrangements in place to assess and manage the risks posed to the health and safety of Personnel in the workplace. These health and safety requirements vary by jurisdiction.
- 4.7.4. Personnel must ensure that they abide by the policies and procedures implemented by Playtech to ensure the health and safety of themselves and others in the workplace.
- 4.7.5. Personnel must not act in any way which may put the health and safety of themselves or others at risk.
- 4.7.6. Personnel must promptly report unsafe or hazardous conditions and must report all breaches of health and safety policies and procedures to the appropriate safety representative.

## 5. Human Rights

- 5.1 Playtech respects the human rights of all individuals who work with, or could be affected by, its operations.
- 5.2 Playtech complies with all applicable human rights laws and operates in accordance with:
  - The International Bill of Human Rights (The UN Declaration and its two covenants 1948);
  - The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work; and
  - The UN Guiding Principles on Business and Human Rights.
- 5.3 Playtech is also committed to preventing modern slavery within its supply chain and has a dedicated statement articulating its commitment. See Playtech's [Human Rights Policy and Statement on Human Rights](#) and [Modern Slavery Act](#) for more information.

## 6. Conflicts of Interest

- 6.1 A conflict of interest occurs where, in the course of business:
  - the interests, duties or commitments that Personnel have through family, friends, work, voluntary work or political interests conflict, or have the potential to conflict, with Playtech's interests or objectives; or
  - where Personnel's judgment could be influenced, or appear to be influenced, by a personal interest, duty, commitment or benefit.

In such a situation, Personnel must not give their own interest priority over that of Playtech.

- 6.2 It is important that Personnel declare conflicts of interest with Compliance through the Convercent database, which holds registration and tracking for conflicts of interest. Once an employee registers a declaration in the system, the Compliance Management Office ("**CMO**") and Chief Compliance Officer will review the declaration to assess whether there is a concern. Playtech will work with Personnel to resolve or mitigate a conflict or potential conflict wherever possible, but Personnel should not continue with the course of action unless or until approval is granted. Additional details regarding Convercent are outlined in the [Anti-Bribery and Corruption Policy](#).
- 6.3 It is not always clear whether an activity creates a conflict of interest. The principles set out below are intended to guide Personnel in identifying and avoiding the types of situations that may give rise to an actual or potential conflict of interest:
- 6.4 Where individuals are in a personal relationship, care must be taken to ensure that no conflicts arise because of that relationship. Personal relationships between individuals within the same line of management will not be permitted.
- 6.5 Individuals should avoid supervising or taking part in the hiring or promotion of family members and avoid holding a position with access to or influence over performance appraisals, salary information or other confidential information of a family member. Such situations should also be avoided where a close personal relationship exists.
- 6.6 Serving on outside boards can present conflicts of interest and should be disclosed and discussed with one's line manager. It is necessary to understand the legal responsibilities and to avoid affiliations which have potential for distraction and/or conflict of interest.

## 7. Personnel Commitments

- 7.1 Personnel are responsible for reading, committing to and complying with this Business Ethics Policy, as well as for applying Playtech's values and standards in the performance of their daily roles.

### 7.1. Data Protection

- 7.1.1. Personnel must comply with Playtech's [Data Protection and Privacy Policy](#) and [Information Security Policy](#), which is outlined in [section 2.13.2](#).
- 7.1.2. For guidance on data protection or privacy, contact Playtech's Privacy team.

### 7.2. Confidential Information

- 7.2.1. Personnel should take care to protect confidential business information at all times. Discussing confidential information in public places, such as airports and restaurants, should be avoided.
- 7.2.2. Any suspected unauthorised disclosure of, or access to, Playtech information, must be reported to immediately to Playtech's Privacy, Compliance or Legal teams, or to the appropriate line manager for escalation.
- 7.2.3. Information received by Personnel during their contract with Playtech must not be used for personal gain or for any purpose other than that for which it was provided.



## 7.3. External Communications

- 7.3.1. All communications must comply with the Group Public Relations and Communications Process.
- 7.3.2. All communications with external parties should be handled with courtesy and professionalism and in line with the Process.
- 7.3.3. Communication with journalists, reporters, investors, regulatory bodies or government officials must be handled in the following ways.

### Media and PR

- 7.3.4. All media enquiries should be handled only by the Corporate Affairs Director (or designee), or in exceptional circumstances by C-level Personnel to which such responsibilities have been delegated.
- 7.3.5. Personnel who are approached by a reporter or journalist should respond in the following manner:  
*"Playtech's policy is to refer all media inquiries to our Corporate Affairs department. Please contact the Director of Corporate Affairs"*
- 7.3.6. Personnel should act quickly and promptly when referring an enquiry, as reporters work to tight deadlines.

### Investors

- 7.3.7. Personnel must not discuss Playtech's business with investors without prior permission of the CEO, COO, CFO or Head of Strategy and Investor Relations.
- 7.3.8. In all cases the Head of Strategy and Investor Relations should be made aware in advance and where possible should be present. Where Personnel find themselves in the presence of investors in Playtech, Personnel should not talk about any commercial matters or specific business practices or strategies.
- 7.3.9. Personnel who are approached by investors for information should refer them to the Head of Strategy and Investor Relations.

### Regulatory authorities & government officials

- 7.3.10. Personnel must not discuss Playtech's business with regulatory authorities or local government representatives without prior permission from Playtech's Chief Compliance Officer, except as required by law.
- 7.3.11. Personnel who are approached by a regulator or government representative should refer the matter to the Chief Compliance officer or his/her designee in Compliance.

## 7.4. Social Media

- 7.4.1. All social media posts (internal and external) must comply with the guidelines outlined in the Public Relations and Communications Process.

- 7.4.2. Social media includes any digital communication channels that enable individuals to create and share content, post comments and send messages. Examples of social media channels are Facebook, Twitter, LinkedIn, WhatsApp, Snapchat and Instagram.
- 7.4.3. Personnel must not use private social media accounts for business purposes. Personal social media activities should be polite, respectful and mindful of the fact that content is public and could impact the way others view Playtech and its values.
- 7.4.4. Sharing any commercially sensitive Playtech activity in any medium (print, photographic, audio) on social media is strictly prohibited. Personnel must not discuss Playtech's interests, their job responsibilities, work products or work colleagues in personal social media posts.
- 7.4.5. Playtech external content, including industry and national print, online, PR and videos, may not be published on social media without prior approval from the Corporate Affairs team and in line with the Public Relations and Communications Process.
- 7.4.6. Do's and Don'ts for social media posts are available in the Public Relations and Communications Process document.

## **7.5. Drugs & Alcohol in the Workplace**

- 7.5.1. Playtech will not tolerate any intoxication at work. Personnel must ensure that any use of alcohol outside of working hours does not impair their ability to perform their duties for Playtech in a safe and professional manner.
- 7.5.2. Alcohol should not be consumed during the working day or while interacting with clients / guests unless it is during business-sponsored social events. If alcohol is served at a business-sponsored social event, then Personnel should ensure that they do not drink to excess and are still able to carry out their jobs and represent Playtech safely, competently and professionally.
- 7.5.3. Playtech does not permit any use of illegal substances or drugs during working hours or on Playtech's premises.
- 7.5.4. Personnel travelling abroad on business matters are representing Playtech. Accordingly, excessive consumption of alcohol after working hours and use of illegal substances is not permitted. This also includes when socialising with clients or guests outside of work hours at pubs, bars and restaurants.
- 7.5.5. Personnel who observe a colleague impaired due to alcohol, drugs, or other intoxicating substances must promptly notify their line manager and the Compliance department. They should not seek to challenge their colleague directly.
- 7.5.6. In the first instance, any individual who is intoxicated, whether through alcohol or drugs, when they attend work will be sent home without pay. Managers must ensure that the individual is not a danger to themselves or colleagues and, if necessary, will make the arrangements to get the individual home safely.

## **7.6. Gambling on Playtech Platform and Games**

- 7.6.1. Personnel are prohibited from gambling on any of the Playtech's platforms (including poker, bingo, casino and sports betting) or content, at any time, without written consent from Compliance. However, Personnel are permitted to play on 'not for money' games on Playtech's platforms.

- 7.6.2. If Personnel are required to play one of Playtech's games for the purpose of reviewing or testing content on a licensee's site, written permission must be obtained from the Compliance Project Management Office within Compliance prior to performing this exercise.
- 7.6.3. This prohibition does not extend to family members, but Personnel are encouraged to notify their manager in the event that a member of the family wins or loses a substantial amount on Playtech's platform, subject to obtaining the family member's consent.

## 8. Asking Questions and Speaking up about Illegal or Unethical Behaviour

- 8.1 Personnel can 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 criticism or retaliation. All such disclosures will be treated in a confidential, sensitive and respectful manner.
- 8.2 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. In addition, Personnel can raise concerns with the Compliance or Legal teams.
- 8.3 However, 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 Playtech's independent, safe and secure 'Speak Up' line provided by Convercent.
- 8.4 Employees 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), Convercent will not attempt to trace individuals' details at any time and, should an individual volunteer their details, Convercent will not pass them back to Playtech unless explicit permission is given by the individual to do so. The contact details are as follows:
- Email <http://speakup.playtech.com/>; or
  - Phone 24 hours a day, 7 days a week. Freephone numbers are available on the Speak Up landing page.
- 8.5 More details can be found in Playtech's [Speak Up Policy](#).

# APPENDIX A - CODE OF CONDUCT

Set out below is Playtech's Code of Conduct which all Personnel should read in conjunction with this Business Ethics Policy. It is a framework for ethical decision making which uses various do's and don'ts which are intended to assist you in determining the right course of action, should you ever be in a position where you require guidance.

## 1. Respect in The Workplace

### 1.1. Anti-harassment

Do	Don't
Familiarise yourself with local anti-harassment laws.	Do not engage in any activity which amounts to harassment.
Seek further guidance immediately if you have any queries or concerns related to harassment.	Do not turn a blind eye to any actions which constitute harassment.
Seek further guidance immediately if you are subjected to, witness or become aware of anything you consider may constitute harassment.	Do not treat anyone any differently if they have alleged that they have been harassed based on being part of a protected class. This could amount to further victimisation/retaliation.
Encourage colleagues to report any harassment they have been subjected to if they inform you of it.	If you are asked to participate in an investigation relating to alleged harassment, do not disclose the details of the investigation to anyone, and respect the privacy of those involved.
Treat all colleagues equally and with respect.	Do not assume that respect for colleagues need only be shown within working hours as activities outside work could also contravene anti-harassment laws.

### 1.2. Anti-discrimination

Do	Don't
Familiarise yourself with this Policy and local anti-discrimination laws.	Do not engage in any activity which amounts to discrimination.
Seek further guidance immediately if you have any queries or concerns related to anything addressed in this Policy.	Do not turn a blind eye to any discriminatory practices or actions.

Do	Don't
Seek further guidance immediately if you are subjected to, witness or become aware of anything you consider may constitute unlawful discrimination.	Do not treat anyone any differently if they have alleged that they have been discriminated against. This could amount to further victimisation/retaliation.
Encourage colleagues to report any discrimination they have been subjected to if they inform you of it.	If you are asked to participate in an investigation relating to alleged discrimination, do not disclose the details of the investigation to anyone, and respect the privacy of those involved.
Treat all colleagues equally and with respect.	Do not assume that respect for colleagues need only be shown within working hours, as activities outside work could also contravene this Policy.
When involved in recruitment or promotion, review the requirements of the role and of the candidates to ensure there is nothing potentially discriminatory. Ensure no potentially discriminatory questions are asked - it would be prudent to prepare these questions in advance.	Do not make assumptions about an employee or Employee's ability to engage in activities because of their race, sex or other characteristic which could result in them being excluded or denied access to opportunities.

### 1.3. Drugs and Alcohol in the Workplace

Do	Don't
Ensure that you only consume alcohol on Playtech premises during events approved in advance by management.	Do not report to work when intoxicated through alcohol or drugs.
Report any instances of intoxication to your line manager and the compliance team.	Do not turn a blind eye to any suspected intoxication on the part of your colleagues. They could be a danger to themselves and to others.

## 2. Human Rights and Labour Standards

Do	Don't
Report any human rights abuses which have occurred. Prevent and mitigate any violation, correcting the issue where possible.	Do not ignore any human rights abuses you suspect may be occurring within the supply chain.
Engage with the local community, building positive relationships in the areas where you operate.	Do not prevent the freedom of workers to associate and collectively bargain or discriminate against workers.

Do	Don't
	Do not permit the use of child and forced labour.

### 3. Safer Gambling and Responsible Advertising

Do	Don't
Ensure that all gambling products and services allow customers to play safely and responsibly.	Do not ignore any instances of people under 18, or vulnerable people, accessing gambling.
Follow all relevant rules and regulations.	

## 4. Treating Customers and Suppliers Fairly

### 4.1. Product Quality and Safety

Do	Don't
Where appropriate, make sure you are familiar with Playtech's quality standards and the technical specifications for Playtech's products.	Do not ignore any potential issues you identify regarding software. Report any issues to your Line Manager/Supervisor as soon as possible.
Do raise any concerns you have about potential or actual changes in the quality of the software with your Line Manager/Supervisor as soon as possible.	

## 5. Avoiding Conflicts of Interest

Do	Don't
Give serious thought to whether a proposed course of action could represent or be perceived to represent a conflict of interest.	Do not attempt to conceal any relationships you may have with any of Playtech's existing or potential suppliers, vendors or other contracting parties.
Report any conflicts or potential conflicts of interest to your line manager and the legal team and await approval before proceeding.	Do not take a financial interest or hold a role in any competitor entity.

Do	Don't
Have Playtech's interests at heart in everything you do during your employment.	Do not enter a personal relationship with someone you manage or who manages you.
Disclose details of any outside engagements or directorships when you join Playtech and seek approval before taking any others that may impact upon your ability to perform your job.	Do not be involved in decision making processes about procurement or recruitment decisions involving your family or friends.

## 6. Complying with all Applicable Laws

### 6.1. Anti-bribery and Corruption

Do	Don't
Consult your local legal department for more detailed guidance and rules and ensure that you comply with them.	Do not engage in any activity or transaction which would lead to a breach of this Ethics Policy, any locally applicable Anti-Bribery and Corruption (ABC) policies or any applicable laws and regulations.
Remain alert to the risks of bribery and corruption.	Do not be persuaded by others to do something which you suspect might be improper or illegal, even if "everyone else is doing it".
Seek further guidance immediately if you have any queries or concerns related to any of the activities addressed in this document.	Do not ever attempt to induce anyone else to do something improper or illegal, even if "everyone else is doing it".
<p>Seek further guidance immediately if you are being asked to do something which makes you uncomfortable, seems unusual or which you suspect may be illegal.</p> <p>Gain approvals for gifts and hospitality in accordance with the thresholds set out in the Anti-Bribery &amp; Corruption Policy.</p>	Do not ignore or fail to report any concerns you have about improper or illegal activity, or otherwise "look the other way".

### 6.2. Anti-trust and Competition

Do	Don't
Discuss general industry-wide matters, but never commercially sensitive information, such as bids or tenders with a competitor.	Do not directly or indirectly fix prices or any other terms and conditions with a competitor.

Do	Don't
Compete fairly, observing the highest of Playtech's company and ethical standards.	Do not discuss any aspect of pricing with a competitor.
Think carefully about any information you give to licensees or operators.	Do not supply to or receive from third parties (that is, competitors, suppliers, customers, and so on.) commercially sensitive information.
Be aware of providing detailed "commercially sensitive information" to a third party for industry benchmarking purposes or for category management.	
Contact the Compliance Department if you are in doubt as to whether certain behaviour could infringe competition law.	

### 6.3. Anti-money Laundering

Do	Don't
Be vigilant against the risk of Playtech being used for money laundering.	Do not ignore your concerns. It is better to report them and confirm that there is no issue than to act as if your concerns did not exist.
Report any concerns you have to your line manager and the compliance team.	Do not make payments to unfamiliar parties or bank accounts without first confirming the reason for making such a payment.
Confirm the source of any funds received whenever you are concerned they might not be from a legitimate source.	Do not accept payments from unfamiliar sources or parties without confirming why they are making the payment, and confirming the source of the funds if possible.

### 6.4. Insider Trading

Do	Don't
Treat information as insider information if you are unsure whether it is insider information.	Do not buy or sell a security while you are in possession of insider information about an issuer of the security.
Where you may have insider information, you must notify the compliance team and obtain clearance before trading.	Do not recommend to anyone that they buy or sell a security while you are in possession of insider information about an issuer of the security, even if you do not disclose the specific information to that person.



Do	Don't
If you are unsure whether any other Personnel need a piece of insider information to do their job, clarify this with your line manager or the compliance team.	Do not give insider information to family members, business acquaintances, friends, or anyone else, including other Personnel (unless they need the information to do their job).
Ensure that any confidential information you have about Playtech and other listed companies are appropriately secure.	Do not discuss insider information in public places, even on Playtech premises.

## 6.5. Integrity of Books and Records

Do	Don't
Ensure that all books and records which you are responsible for maintaining are truthful and accurate.	Do not falsify a document or omit information from a document which might cause that document to give a misleading or incomplete impression.
Query any items on any records which appear unusual, suspicious or incomplete.	Do not maintain records or process transactions in a manner which might assist another person in any illegal activities, for example, evading taxes.
Frequently review books and records which you are responsible for to double check for any previous errors.	Do not make payments to a company or person that did not provide the services in respect of the payment, unless there is a legitimate reason to do so.
Respond truthfully to all appropriate questions from auditors.	

# 7. Ensuring Safety, Employee Wellbeing and An Environmentally Friendly Workplace

## 7.1. Health & Safety

Do	Don't
Co-operate with others in relation to health and safety by acting in compliance with all health and safety policies and procedures.	Do not interfere with, or misuse, anything which may cause harm to your health, safety or welfare or that of others in the workplace.

Do	Don't
If you see a colleague working in a way which contravenes Playtech's health and safety policies and procedures, report it immediately to the appropriate safety representative to help avoid a potential accident.	Do not attempt to undertake any task which may present a risk to your safety or that of others unless you have received the correct safety training.
If there is an accident or near miss in the workplace, provide any necessary assistance to Playtech with any internal investigation undertaken into the circumstances surrounding the accident or near miss.	
Make sure you are familiar with Playtech's emergency and evacuation procedures in your location.	

## 7.2. Environmental Practices

Do	Don't
Raise any suggestions you may have about ways in which Playtech may develop its strategies and policies regarding the environment.	Do not ignore any potential issues you identify regarding the impact working practices may have on the environment. Report any issues to your line manager and the compliance team.
Work in a way which complies with Playtech's policies and procedures in relation to the protection of the natural environment and the development of an environmentally friendly working environments.	Do not think that environmental issues are less important than, for example, health and safety or product quality issues. They all have a part to play in ensuring a safe, quality and an environmentally friendly workplace.

## 8. Protecting Our Information and Assets

### 8.1. Data Protection

Do	Don't
Delete sensitive data in relation to potential Personnel where this is no longer required, for example where that have not been successful in their job application.	Do not record sensitive data about an Employee (such as health data, information about trade union membership, and so on) unless this is necessary for the purposes for which the Employee's data is processed.

Do	Don't
Regularly review the data maintained in Playtech's systems to verify whether it is still accurate and up to date.	Do not simply delete personal data without consulting your line manager first, as the data may be subject to minimum retention terms imposed by local laws.
When you receive an email from a data subject requesting an overview of the personal data held about them, recognise such request as a data subject access request and follow the procedures as set forth by your local team/legal department/the compliance team.	Do not launch a new project which requires the processing of personal data (for example, a new marketing campaign, working with a new HR service provider) without considering the security of the personal data first.

## 8.2. Confidentiality

Do	Don't
Be vigilant and careful when using electronic means of storing and sending confidential information.	Do not discuss confidential information in places where you can be overheard.
Consider the rules on record retention and destruction, and contact the legal team when disposing of confidential or proprietary information.	Do not initiate and manage paper or electronic back-up files outside of the company's system, such as personal file management systems or public clouds.

## 8.3. Use of Company Property

Do	Don't
Only use authorised software, devices and procedures.	Do not use unauthorised devices (such as your private computer or unauthorised public clouds) to transmit, store or work on Playtech confidential information.
When you have suspicions that a certain email or attachment may adversely affect the company's IT systems, report this to your IT department without delay.	Do not open emails from unknown sources without verifying the source first.
Use all company property in a professional and responsible way.	Do not use company property for personal purposes without prior approval

## 8.4. Intellectual Property

Do	Don't
Ensure that third parties, including business partners, respect Playtech's trade secrets, only use the information provided to them for providing services to Playtech, and that an appropriate confidentiality or non-disclosure agreement/clause is put in place.	Do not provide confidential information to third parties, including business partners, without putting in place appropriate confidentiality agreements/clauses.
Store confidential information on secured devices, which can only be accessed after user authentication.	Do not store trade secret information on a public server, which can be accessed without any user authentication.

## 9. External Communications

Do	Don't
Refer all requests from the media for information regarding Playtech to the Head of Communications.	Do not enter communications with, or respond to requests for information from the media.
Refer any queries from a regulator or government representative to the Compliance Department.	Do not talk to investors regarding Playtech's business without prior approval from the CEO, COO, CFO or Head of Strategy and Investor Relations.
	Do not use private social media accounts for business purposes.
	Do not discuss Playtech's interests, work products or work colleagues in personal social media posts.
	Do not discuss Playtech's business with regulatory authorities or local government representatives without prior permission from the Chief Compliance Officer. Do not share, publish written or photographic material relating to any commercially sensitive Playtech activity via social media channels.

# 10. Asking Questions and Reporting Violations

Do	Don't
Make sure you understand the provisions of this Ethics Policy, and ask questions where you are unsure.	Do not ignore or fail to report your concerns.
Report any concerns you have of any possible or actual breaches of this Ethics Policy.	Do not report concerns you know to be inaccurate or untrue.
Treat colleagues you know to have raised concerns with courtesy and respect.	Do not treat a colleague you know to have raised a concern any differently than you have previously treated them.
Challenge, in a polite and respectful way, the behaviour of any colleague which you feel might be in breach of the provisions of this Business Ethics Policy.	Do not jump to conclusions. There may be a perfectly valid and reasonable explanation for conduct which otherwise seems to be suspicious.