



# Speak Up Policy

Approved by the Board of Directors

May 2020

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# 1. About this Policy

## 1.1. Policy Statement

- 1.1.1. Playtech is committed to conducting its business with honesty and integrity and to promoting a culture of openness, integrity and accountability.
- 1.1.2. 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 employees to voice concerns in a responsible, appropriate and effective manner without fear of criticism or retaliation.
- 1.1.3. This policy (the 'Speak Up Policy') is designed to support our values, our commitment to safeguard employees and to encourage employees to seek help and report any concerns they may have.

## 1.2. Purpose of this Policy

- 1.2.1. 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 Anti-Money Laundering & Counter-Terrorist Financing Policy, Anti-Facilitation of Tax Evasion Policy, Data Protection and Privacy Policy, Anti-Bribery & Corruption Policy and Safeguarding Policy.

## 1.3. Application of this Policy

- 1.3.1. This Policy applies to the Playtech group of companies, which means Playtech Plc and its subsidiaries (collectively referred to as 'Playtech' in this Policy).
- 1.3.2. 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.
- 1.3.3. This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time.

## 1.4. Oversight and Monitoring of this Policy

- 1.4.1. Playtech's Risk Committee has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 1.4.2. The Risk 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.
- 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 in supporting employees who wish to speak up.
- 1.4.4. 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.
- 1.4.5. Employees 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.

## 1.5. Related Documents

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

## 2. Speaking Up

### 2.1. What is speaking up?

- 2.1.1. Speaking up, or whistleblowing, is raising 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 concern;
  - damage to the environment;
  - human rights and/or modern slavery concern;
  - bribery under Playtech's Anti-Corruption and Bribery Policy;
  - facilitating tax evasion contrary to Playtech's Anti-Facilitation of Tax Evasion Policy;
  - financial fraud or mismanagement;
  - negligence;

- breach of Playtech's internal policies and procedures including the Business Ethics Policy and Anti-Money Laundering and Counter-Terrorist Financing Policy;
  - conduct likely to damage Playtech's reputation;
  - unauthorised disclosure of confidential information; or
  - bullying or sexual harassment.
- 2.1.2. 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.
- 2.1.3. If employees 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](#) (whose contact details are set out in [Appendix A](#) of this Policy).

## 3. Raising a Concern

### 3.1. How to Raise a Concern

- 3.1.1. Playtech hopes that in many cases employees will be able to raise any concerns with their line manager. Employees 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.
- 3.1.2. However, where the matter is more serious, or where employees feel that the line manager has not addressed their concern, or where employees 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
  - Local safeguarding lead
  - Stavros Anastasiou - Chief Compliance Officer of Tradetech Group (for the Financials Division) (the 'Tradetech CCO')

- Our confidential external 'Speak Up' line. The Speak Up Line is an independent external hotline provided by Expolink for Playtech, which allows employees across the Playtech group to raise concerns via telephone or via a secure web portal confidentially and anonymously.

Full contact details are set out in [Appendix A](#) of this Policy.

## 3.2. What Happens When a Concern is Raised

- 3.2.1. When an employee raises a concern via the Speak Up Line, the details are channelled to the Chief Compliance Officer and General Counsel to investigate further. In the case of TradeTech, the matter will be directed to the Tradetech CCO.
- 3.2.2. Where appropriate, a team may be initiated to conduct an investigation to gather and establish relevant facts relating to the matter. This can include the appointment of an independent, external legal advisor to support the review. Employees may also be asked to provide further information, or answer questions about their concern, if required.
- 3.2.3. Employees will receive an initial response of acknowledgement within seven days and regular feedback and updates on the progress of the investigation into their concern (every four weeks at minimum) until the matter has been resolved. 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 final feedback to the employee, within three months of the report.
- 3.2.4. 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.
- 3.2.5. Once the relevant members of senior management have been informed and consulted, 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.
- 3.2.6. 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.
- 3.2.7. Playtech will make every effort to address employees' concerns confidentially, fairly and professionally. If employees are not happy with the way in which a concern has been handled, they can contact any of the contacts listed in [paragraph 3.1.2](#).

## 3.3. Confidentiality and Anonymity

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

- 3.3.2. If an employee wishes to remain anonymous when raising a concern, they should make this clear upfront. Employees 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.
- 3.3.3. Although the identity of the employee raising the concern will be kept confidential, 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.
- 3.3.4. Playtech encourages employees to include their name in any disclosures. 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.

## 3.4. Protection and Support for Speaking Up

- 3.4.1. It is understandable that employees who speak up may be concerned about possible repercussions and/or retaliation against them.
- 3.4.2. Playtech aims to encourage openness and will support staff who raise genuine concerns under this policy, even if the concerns are mistaken.
- 3.4.3. Playtech will do everything in its power to ensure that employees who speak up do not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes bullying, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 3.4.4. 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.
- 3.4.5. 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.

- 3.4.6. 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 employees experience retaliation as a result of speaking up. Employers can now be held vicariously liable for the retaliatory actions of their employees, and those employees who make threats, victimise, or degrade whistleblowers (e.g. through malicious allegations and other abuses of this Policy) can be held personally liable for their actions.
- 3.4.7. If employees 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.

## 3.5. External Disclosures

- 3.5.1. 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 employees to report concerns to an external body such as a regulator; however, Playtech strongly encourages employees to seek advice before reporting a concern to external organisations.
- 3.5.2. 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 employees if raising a matter with the third party directly. However, Playtech encourages employees to report such concerns internally first. Employees should contact their line manager, HR, the Chief Compliance Officer and/or the General Counsel.

## 3.6. Training and Awareness

- 3.6.1. Employees 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, presentations, posters, employee handbooks and compliance training modules.
- 3.6.2. Individuals responsible for supporting the Speak Up Policy, including safeguarding leads, HR focal points and relevant Legal and Compliance staff, will receive training about their obligations under this Policy and the underlying regulatory requirements.
- 3.6.3. 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 employees are provided with information about the Policy and speak up mechanisms.

# APPENDIX A - KEY CONTACTS

## KEY CONTACTS

### For Playtech:

Chief Compliance Officer

Name: Ian Ince  
Tel: +447912781588  
Email: [ian.ince@playtech.com](mailto:ian.ince@playtech.com)  
Reports to: Mor Weizer, Chief Executive Officer

General Counsel

Name: Alex Latner  
Tel: +442074281944  
E-mail: [alex.latner@playtech.com](mailto:alex.latner@playtech.com)  
Reports to: Mor Weizer, Chief Executive Officer

Speak Up Line - available 24/7/365

Name: Expolink Line  
Tel: +44 1249 661808 will work from anywhere in the world  
International Freephone Numbers are noted below  
E-mail: [playtech@expolink.co.uk](mailto:playtech@expolink.co.uk)  
Website: <https://wrs.expolink.co.uk> (Access code: Playtech)

### For the Financials Division (Tradetech Group):

CCO

Name: Stavros Anastasiou  
Tel: +357 22 232248 ext.8313 (or +357 99645890)  
Email: [Stavros.Anastasiou@TradeTech-Group.com](mailto:Stavros.Anastasiou@TradeTech-Group.com)  
Reports to: Liron Greenbaum, Tradetech's COO

Speak Up Line - available 24/7/365

Name: Expolink Line  
Tel: +44 1249 661808 will work from anywhere in the world (or 800 95207 for Cyprus)

International Freephone Numbers are noted below

E-mail: [playtech@expolink.co.uk](mailto:playtech@expolink.co.uk)

Website: <https://wrs.expolink.co.uk> (Access code: Playtech)

## SPEAK UP LINE

The table below sets out Freephone numbers that employees can use to access Playtech's anonymous Speak Up line from different countries.

Where there is no Freephone number for a particular jurisdiction, employees can make a collect call/reverse charge call as follows:

- dial the country operator;
- request an international collect call or reverse charge to +44 1249 661 808;
- the country operator dials the number and speaks to an Expolink operator, who will accept the call and charges relating to the call; and
- the country operator connects caller to Expolink, leaves the call, and then the call takes place as normal.

Country	Freephone number	Alternative Number (If applicable)
Albanian	Caller dials 00-800-0010 then will either get through to the operator or hear a recorded message which will then prompt them to dial 8666812836	
Argentina	0800 6662603	
Armenia (Yerevan)	60462 2655 (Local Rate Number)	
Australia	1800 121 889	
Austria	0800 281700	
Bahrain	80004475	
Bangladesh	Caller dials 157-0011 then will either get through to the operator or hear a recorded message which will then prompt them to dial 8779167615	
Barbados	1844 854 1994	
Belarus	882000 730028	
Belgium	0800 71025	
Brazil	0800 891 8807	
Bulgaria	00800 110 44 74	

Country	Freephone number	Alternative Number (If applicable)
Cambodia	0855 23962548 (Local Rate Number)	
Canada	1888 268 5816	
Chile	123 002 004 12	
China (North - China Netcom)	10800 852 2112	00800 3838 3000
China (South - China Telecom)	10800 152 2112	
China (Whole)	400 120 3148 (Local Rate Number)	
Colombia	01800-944 4796	
Congo (Democratic Republic)	064 000 005 (Local Rate Number)	
Costa Rica	8000440101	
Croatia	0 800 222 845	
Cuba	Caller dials 2935 then will either get through to the operator or hear a recorded message which will then prompt them to dial 8779167615	
Cyprus	800 95207	
Czech Republic	800 142 428	
Dominican Republic	1800 148 5275	
Denmark	8088 4368	
Egypt	0800 000 00 23	
Eire	1800 567 014	
Estonia	800 00 44 265	
Finland	0800 116773	
France	0800 900240	
Georgia	0706 777 469 (Local Rate Number)	
Germany	0800 182 3246	
Ghana	54 431 5494 (Local Rate Number)	
Greece	00800 4414 5735	00800 441 31422
Hawaii	1866 293 2604	

Country	Freephone number	Alternative Number (If applicable)
Hong Kong	800 930770	
Hungary	06800 14863	
Iceland	800 82 79	
India	000 800 440 1286	
Indonesia	007 8030 114626	001 803 0441 1201
Israel	1809446487	
Italy	800 783776	
Japan	00531 78 0023	0081 368 908 675 (Local Rate Number)
Jordan	0800 22984	
Kazakhstan	88003333524	
Kenya	0800 723 132	
Korea (South)	00308 442 0074	
Kuwait	22274590 (Local Rate Number)	
Kyrgyzstan	00800 30022 016 (Toll Free Number)	
Latvia	8000 26 70	
Lithuania	8800 30 444	
Luxembourg	8002 4450	
Malaysia	1800 885 530	1800 805 597
Malta	800 62404	
Mexico	01800 123 0193	
Monaco	800 936 90	
Morocco	0800 092 326	
Namibia	8333 000 85 (Local Rate Number)	
Netherlands	0800 022 9026	
New Zealand	0800 443 816	
Nigeria	7080601033	
Norway	800 14870	

Country	Freephone number	Alternative Number (If applicable)
Oman	80077686	
Pakistan	00800 900 44181	
Paraguay	0098 0044 10168.	
Peru	0800 53611	
Philippines (PLDT & SMART Networks)	1800 1441 0948	1800 1442 0076
Philippines (GLOBE Network)	1800 8739 5278	
Poland	00800 442 1245	00800 441 2392
Portugal	800 880 374	
Puerto Rico	1866 293 1804	
Qatar	800 0019	
Romania	08008 94440	
Russia	810 800 260 81044	810 800 2058 2044
Saudi Arabia	800 844 0172	
Serbia	0800 190 603	
Singapore	800 4411 140	
Slovakia	0800 004461	
Slovenia	0800 80886	
South Africa	0800 990520	
Spain	900 944401	
Sri Lanka	011 244 5413 if dialing from Colombo omit 011)	
Sweden	0200 285415	
Switzerland	0800 563823	
Taiwan	0080 10 44202	
Tajikistan (Dushanbe)	42781 5394 (Local Rate Number)	
Tanzania	0411200059 (Local Rate Number) TTCL Landlines Only	
Thailand	001 800 442 078	

Country	Freephone number	Alternative Number (If applicable)
Trinidad/Tobago	18002037122	
Turkey	00800 4488 29578	00800 4463 2066
UAE (United Arab Emirates)	8000 44 138 73	
Uganda	206300056 (Local Rate Number) UTL Landlines Only	
Ukraine	0800 609 172	
United Kingdom	0800 374199	
Uruguay	40190882	
USA	1877 533 5310	
Uzbekistan	00800 120 1049 (Toll Free Number)	
Venezuela	0800 100 3199	
Vietnam	120 11527	
Zimbabwe	86 4404 1044 (Local Rate Number)	

## APPENDIX B - RELATED DOCUMENTS

Business Ethics Policy

Anti-Bribery and Corruption Policy

Anti-Facilitation of Tax Evasion Policy

Data Protection Policy

Anti-Money Laundering and Counter-Terrorist Financing Policy

Safeguarding Policy

Human Rights and Modern Slavery Statement