



Anti-Bribery and Corruption 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 in a lawful and ethical manner and takes a zero-tolerance approach to bribery and corruption. Playtech upholds all laws relevant to anti-bribery and corruption ('ABC') in the jurisdictions in which it conducts business, including the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act 1977, and is committed to acting professionally, fairly and with integrity in all its business relationships.
- 1.1.2. Bribery and corruption pose risks to Playtech's business. Playtech is committed to identifying, assessing and understanding these risks, and has established a tailored ABC programme (the 'ABC Programme') to manage and mitigate effectively the risks it has identified.
- 1.1.3. Playtech's ABC Programme is shaped by current applicable legislation, regulations and best-practice guidelines. It includes establishing and maintaining this board-approved ABC Policy (the 'Policy'), installing appropriate processes and procedures, and implementing as well as enforcing effective training and controls.
- 1.1.4. The effective implementation of this ABC Policy and associated procedures will help to protect Playtech, its employees, shareholders, customers and suppliers from the risks of bribery and corruption. It will also maintain confidence in Playtech and provide for continued, successful business operations.

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 bribery and corruption; and
 - provide information and guidance to those working for Playtech on how to recognise and deal with bribery and corruption issues.

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 must comply with this Policy, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, and where appropriate, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other persons associated with Playtech, wherever located (collectively referred to as 'Personnel' in this Policy).
- 1.3.3. Any breach of this Policy may result in disciplinary action for Playtech employees. Playtech may terminate its relationship with other individuals or organisations working on its behalf if they breach this Policy. Moreover, this conduct may constitute a criminal offence which may result in prosecution.

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

1.3.5. Exceptions to this Policy are not permitted.

1.4. Oversight and monitoring of this Policy

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

1.4.2. Playtech appoints a member of its senior management to be responsible for compliance with all applicable ABC laws in the jurisdictions in which Playtech operates. Details of the appointed individual are set out in [Appendix A](#).

1.4.3. Playtech's Risk Committee has overall responsibility for ensuring that this Policy complies with Playtech's legal and ethical obligations, and that all Personnel under Playtech's control comply with it. Playtech's Risk Committee will review this Policy, its implementation and effectiveness, and compliance with it on an annual basis. Details of the appointed committee members are set out in [Appendix A](#).

1.4.4. 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 countering bribery and corruption.

1.4.5. Senior management, at all levels, are responsible for ensuring that those reporting to them are made aware of and understand this Policy.

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

2. Bribery and corruption

2.1. Bribery

- 2.1.1. Bribery is offering, promising, giving, requesting, agreeing to receive, or accepting a financial or other advantage (for example, money, gifts, loans, hospitality, services, discounts, the award of a contract or anything else of value), to induce a person to act improperly in the performance of their relevant function, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
- 2.1.2. A person acts improperly where they act illegally, unethically, or contrary to the expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts during employment, or other activities by, or on behalf of, any organisation of any kind.
- 2.1.3. Bribery can take many forms, including:
 - 2.1.3.1. 'Facilitation payments' (also known as 'back-handers' or 'grease payments'), which are small, unofficial payments made to secure or expedite a routine or necessary action. A typical example might be an 'inspection fee' for clearing imported equipment through customs. Facilitation payments are bribes and are prohibited under this Policy. They are also illegal in many countries, including the UK. However, you should never refuse to make a facilitation payment if faced with a threat of, or fear of, violence or loss of life or liberty. The safety of our Personnel is our primary concern in all our operations. Where a facilitation payment is unavoidable and payment is made, you should report it to the Head of Regulatory Affairs and Compliance immediately so that it can be properly documented.'
 - 2.1.3.2. 'Kickbacks', which are incremental payments negotiated and paid in return for a business favour or advantage. A typical example might be a commission paid in exchange for selecting a particular vendor. Kickbacks are bribes and are prohibited under this Policy. They are also illegal in many countries, including the UK.

2.2. Corruption

- 2.2.1. Corruption is the abuse of entrusted power or position for private gain.

2.3. Bribery offences

- 2.3.1. Playtech upholds all laws relevant to countering anti-bribery and corruption in all the jurisdictions in which it does business, including the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977. This Policy is based predominantly on the rules and requirements set out in the UK Bribery Act 2010, but local laws may also apply and must be followed. Where local laws are not as strict as the terms of this Policy, this Policy shall take precedence (unless prohibited by local law).
- 2.3.2. Playtech is bound by the UK Bribery Act 2010 in respect of its conduct both in the UK and abroad. This Act is widely considered to be the most stringent anti-bribery law in the world.

2.3.3. The UK Bribery Act 2010 makes it a criminal offence:

- to offer, promise, or give a financial or other advantage to another, where the person:
 - intends the advantage to bring about the improper performance of a relevant function or activity by another person or to reward such improper performance; or
 - knows or believes that the acceptance of the advantage offered, promised or given, itself constitutes the improper performance of a relevant function or activity.
- to request, agree to receive or accept a financial or other advantage intending that in consequence a relevant function or activity should be performed improperly, or as a reward for improper performance, or where there is improper performance in anticipation of such an advantage;
- to offer, promise or give a financial or other advantage to a foreign public official or to another at the foreign public official's request or with his assent, intending to influence the official in his capacity as an official and intending to obtain or retain business or an advantage in the conduct of business for the company; and
- for companies to fail to prevent bribery committed by a person 'associated with' the company which is intended to obtain or retain business or obtain a business advantage for the company. This offence applies to on conduct committed in the UK or overseas. The Company will have a defence to this offence if it can show, on the balance of probabilities, that it had in place 'adequate procedures' designed to prevent bribery.

2.3.4. For the purposes of the Bribery Act 2010, a foreign public official includes (i) anyone who holds a foreign (i.e. a country or territory outside the UK) legislative or judicial position; (ii) individuals who exercise a public function for a country, territory, public agency or public enterprise of a country or territory outside of the UK; or (iii) any official or agent of a public international organisation.

2.3.5. 'Associated persons' may include employees, subsidiaries, third party agents, and anyone else who performs services for, or on behalf, of the company.

2.4. Penalties

2.4.1. An individual found guilty of committing an offence may be punished with imprisonment for a maximum term of ten years, an unlimited fine, or both.

2.4.2. A company found guilty of committing an offence may be punished with an unlimited fine. A company may also be excluded from tendering for public contracts and will incur significant reputational damage.

2.5. Examples of bribery

Offering a bribe

Scenario: A Commercial Director offers a potential client tickets to a major sporting event during a tender process, on the basis that in return the client will award its business to Playtech instead of a competitor.

Offences: The Commercial Director would commit an offence of bribing another person, as he/she offered an advantage with the intention of obtaining business for Playtech. If the client accepts the tickets intending to act improperly in return, he/she would also commit the offence of accepting a bribe.

Receiving a bribe

Scenario: A supplier offers the nephew of a senior IT Manager a job but makes it clear that in return the IT manager must use his influence at Playtech to ensure Playtech continues to do business with the supplier.

Offences: The supplier would commit an offence of bribing another person by offering an advantage to the IT manager in return for acting improperly in the performance of his functions. If the IT manager arranges for his nephew to accept the offer, intending in doing so to act improperly with regard to ensuring continued use of the supplier, the IT manager would also commit an offence of accepting a bribe.

Bribery by an 'associated person'

Scenario: A third-party consultant to Playtech assures the Compliance Manager that he/she can resolve an issue preventing a regulator from issuing Playtech with a licence – no questions asked. The Compliance Manager does not know whether the consultant has been made aware of this Policy, or if the agreement between Playtech and the consultant contains ABC obligations. No further questions are asked.

Offences: If the third-party consultant has bribed the regulator to secure the licence (with or without Playtech's knowledge), Playtech would commit an offence of failing to prevent bribery by a person 'associated with' it. The consultant would also be guilty of paying a bribe.

Bribing a foreign official

Scenario: A member of the Compliance team arranges for the business to pay a fee directly to a foreign government official to speed up the administrative process of obtaining a gambling licence. The team

member understands that this is what all companies do and that such payments are customary in this jurisdiction.

Offences: This fee appears to be a facilitation payment and is therefore unlawful. The member of the Compliance team would commit the offence of bribing a foreign public official, as the intention is to influence that official in the conduct of his/her duties to obtain a business advantage for Playtech.

2.5.1. Note that when an offence is committed under ABC legislation it will typically be accompanied by a tax evasion offence where neither the payer nor the recipient account appropriately for the expense or the income received. Failing to prevent the facilitation of tax evasion is another corporate offence to which Playtech is subject.

3. Personnel obligations

3.1. Obligations

- 3.1.1. Personnel must be aware of and understand the principles of bribery and corruption, the associated offences, and their responsibilities set out in this Policy.
- 3.1.2. Personnel must not, directly or indirectly, commit any of the bribery offences. Any activity which might lead to, or suggest, a breach of this Policy must be avoided.
- 3.1.3. Personnel must not threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this Policy.
- 3.1.4. Personnel must comply with Playtech's Gift and Hospitality Policy (see section 5 below).
- 3.1.5. Personnel must comply with Playtech's Expenses processes.
- 3.1.6. Personnel must complete Playtech's compliance training covering ABC.

3.2. Conflicts of Interest

- 3.2.1. A conflict of interest occurs where, in the course of business:
- 3.2.2. 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
- 3.2.3. where Personnel's judgment could be influenced, or appear to be influenced, by a personal interest, duty, commitment or benefit.
- 3.2.4. In such a situation, Personnel must not give their own interest priority over that of Playtech.
- 3.2.5. 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 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 are outlined in the Anti-Bribery and Corruption Policy.
- 3.2.6. 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:
- 3.2.7. 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.
- 3.2.8. 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.

- 3.2.9. 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.

3.3. Reporting Knowledge or Suspicion Of Bribery

- 3.3.1. Personnel who know or suspect (even if they are unsure) that they have been offered a bribe, or asked to bribe another, or know or suspect another person is committing an offence, must disclose this to Playtech's Chief Compliance Officer, Legal or HR, or raise their concerns confidentially via Playtech's 'Speak Up' line (see Playtech's 'Speak Up' Policy).
- 3.3.2. Personnel who believe that they have suffered detrimental treatment (including dismissal, disciplinary action, threats or other unfavorable treatment) as a result of refusing to take part in bribery or corruption, should disclose this to the Chief Compliance Officer, Legal or an HR focal point, or raise it confidentially via Playtech's 'Speak Up' line.

3.4. Consequences

- 3.4.1. Personnel who breach these obligations shall face disciplinary action, which could result in dismissal for gross misconduct, or termination of contract.

3.5. Examples of Activity Which Should Be Reported

- 3.5.1. The following examples illustrate the kind of behaviour or conduct which may constitute bribery and should be reported as well as investigated further:
- a Playtech employee learns that a third party engages in, or has been accused of engaging in, improper business practices, paying bribes, or requiring that bribes are paid to them;
 - a third party insists on receiving a commission or fee payment before committing to sign up to a contract, or carrying out a government function or process;
 - a third party refuses to sign an agreement, or to provide an invoice or receipt for a payment made;
 - a colleague refuses to take time off or allow others to manage or see what they are working on;
 - a third party or colleague requests that payment is made to a country other than where the third party resides;
 - a third party requests an unexpected additional fee or commission to 'facilitate' a service;
 - a customer or supplier demands, or offers, lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
 - a third party or colleague requests that a payment is made to 'overlook' potential legal violations; or
 - a third party issues an invoice that appears to be non-standard or customised.

4. Playtech's Obligations

4.1. Obligations

- 4.1.1. Playtech must not, directly or indirectly, commit any of the bribery offences.
- 4.1.2. Playtech must assess the bribery and corruption risks it faces, as well as provide training and implement policies and procedures to mitigate those risks and assist Personnel in complying with applicable anti-bribery laws.

4.2. Risk Assessment

- 4.2.1. Playtech conducts an annual risk assessment to identify, assess and understand the risks its business faces, and put in place appropriate procedures to mitigate these risks effectively.

4.3. Policies and Procedures

- 4.3.1. Playtech implements and enforces appropriate policies, procedures and internal systems and controls to manage and mitigate ABC risks. Such policies, procedures and internal controls are reviewed annually to ensure they are up-to-date and appropriate for the nature and size of Playtech's business.
- 4.3.2. Playtech conducts regular audits to monitor its compliance with this Policy, to examine and evaluate the effectiveness of the procedures and controls in place, and to make recommendations for improvements.
- 4.3.3. Playtech has appropriate procedures in place to ensure that employees who report breaches of this Policy to Compliance, Legal, via Playtech's 'Speak Up' line, or externally to the relevant authority, are both protected from exposure to threats or hostile action and from adverse or discriminatory employment actions.

4.4. Training, Awareness and Resources

- 4.4.1. Playtech makes Personnel aware of their obligations and responsibilities relating to ABC. Playtech conducts relevant compliance training (either face-to-face or online, as appropriate) for its Personnel and provides appropriate training resources.
- 4.4.2. Playtech maintains a written record of all training provided and awareness measures taken.

4.5. Third Parties

- 4.5.1. Playtech expects its business partners to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. Playtech informs its commercial agents, representatives, joint-venture partners, suppliers, contractors and sub-contractors ('Third Parties') of this Policy and requires them to act in accordance with the Policy when working for or 'on behalf' of Playtech.
- 4.5.2. Playtech conducts due diligence on all Third Parties before entering into a business relationship with them. These requirements are explained in Playtech's Anti-Money Laundering & Counter-Terrorist Financing Policy and Due Diligence Procedures.

- 4.5.3. Playtech includes in its contracts with Third Parties: i) an obligation to comply with all relevant ABC laws and regulations; and ii) an obligation to comply with the terms of this Policy and ensure that those acting for, or on behalf, of the Third Party in relation to Playtech business also comply with the terms of this Policy.
- 4.5.4. Playtech must keep records and have appropriate internal controls in place, which will evidence the business reason for making payments to Third Parties.
- 4.5.5. All accounts, invoices, and other records relating to dealings with Third Parties and customers shall be prepared with strict accuracy and completeness. Accounts must not be kept 'off-book' to facilitate or conceal improper payments.

4.6. Political and Charitable Contributions

- 4.6.1. Playtech does not make contributions to political parties.
- 4.6.2. 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 by the Chief Compliance Officer or his designee.
- 4.6.3. Further information about policies and procedures for donations to charitable organisations can be found in Playtech's Community Investment Policy.

5. Playtech's Gift and Hospitality Process

5.1. Hospitality and Entertainment

- 5.1.1. 'Entertainment' or 'hospitality' is generally where you accompany or invite a third party to an event. It includes, for example, business meals, invitations or tickets to recreational, cultural or sports events and venues, as well as any associated travel, accommodation, meals and refreshments.
- 5.1.2. Offering or accepting hospitality is permitted, provided that the hospitality is:
- for the purposes of:
 - establishing or maintaining a good business relationship;
 - improving or maintaining Playtech's image or reputation; or
 - marketing or presenting Playtech's products and/or services effectively;
 - and is:
 - reasonable and appropriate (an objective assessment based on the jurisdiction);
 - within the permitted financial thresholds (see paragraph 5.5); and
 - has the appropriate prior approvals.
- 5.1.3. For example, accepting or providing invitations to domestic sporting events for existing licensees with whom Playtech is not currently negotiating is acceptable. However, if it involves overseas travel or is of exceptional value outside of the thresholds set out in the table at paragraph 5.5 below, (for example, F1), then please contact Playtech's Compliance department to discuss further.
- 5.1.4. Any hospitality that involves Playtech's VIP customers (i.e. individuals on the business-to-consumer side of the business) is only permitted to occur once Playtech Compliance has completed the standard source of funds, enhanced customer due diligence, Know Your Customer and safer gambling checks with acceptable results. Appropriate records must then be retained. The VIP team must also seek final approval from Playtech's Compliance department prior to the hospitality event taking place.

5.2. Gifts

- 5.2.1. Gifts are non-cash items given as a token of appreciation or gesture of gratitude.
- 5.2.2. Giving or receiving cash or cash equivalents (such as gift certificates or vouchers) is not permitted.
- 5.2.3. Giving or accepting non-cash gifts is permitted, provided that the gift is:
- not made with the intention of influencing a third party to obtain or retain business or a business advantage for Playtech, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits; and
 - given in the company's name.

5.2.4. appropriate in the circumstances, taking account of the reason for the gift, its timing and value;

- given openly, not secretly;
- in compliance with any applicable local law;
- within the permitted financial thresholds (see section 5.5); and
- has the appropriate prior approvals.

5.2.5. Prior approval from the Chief Compliance Officer is required if the hospitality or gift:

- involves overseas travel;
- is of a higher value than the thresholds set out in the table below;
- involves Playtech's VIP customers (i.e. customers of Playtech's business-to-consumer operations); or
- involves government officials or representatives, politicians or political parties, or regulators.

5.3. Suspicion of Bribery

5.3.1. If there is reason to suspect that, even though the value of a gift or offer of entertainment is below the thresholds set out below, it is being offered, given, requested or received to encourage or reward improper performance (particularly during commercial negotiations), then the offer shall be declined and Playtech's Compliance department shall be notified as soon as possible.

5.4. Reporting and Record-keeping

5.4.1. A written record must be kept of all hospitality or gifts given or received.

5.4.2. The Head of Compliance Management Office ("CMO") manages an online platform (Convercent) to enable requests, declarations and documentation of gifts and hospitality as well as conflicts of interest.

5.4.3. Employees who receive and/or give gifts and hospitality that meet the relevant thresholds required for escalation and approval must log their requests via the Convercent tool. Once received, the CMO and Chief Compliance Officer will review the requests and make the relevant decisions. Individuals registering requests will be notified of decisions via the messaging function within the tool and/or by email.

5.4.4. The Convercent platform is the platform for reporting internally and externally, as needed.

5.5. Gifts and Hospitality Thresholds Table

5.5.1. Note that ≤ means 'less than or equal to' and > means 'more than'.

Gift value	Entertainment (including meals) value	Approval requirements	Notification requirements
≤£50	≤£100 per person ('pp') per event, and ≤£400 pp / year Executive Level and above: ≤£150 pp per event and ≤£1,000 pp / year	None	None
>£50 and ≤£500	>£100 but ≤£500 pp per event and >£400 but ≤£1,000 pp / year Executive Level and above: >£150 but ≤£500 pp per event and >£1,000 but ≤£2,000 pp / year	Head of Department	Notify Playtech's Compliance Department in writing by completing the form attached in Appendix A
>£500	Executive Level and above only: >£500 pp per event and >£2,000 but ≤£3,000 pp / year	Head of Regulatory Affairs and Compliance	Notify Playtech's Chief Compliance Officer in writing by completing the form attached in Appendix A . The Chief Compliance Officer's approval must be recorded on the form

APPENDIX A - HOSPITALITY DECLARATION FORM

If an employee does not have access to the Convercent system to declare gifts and hospitality, he/she can use this form to declare gifts, hospitality and entertainment in accordance with the Playtech Anti-Bribery & Corruption Policy.

The Convercent system can be accessed via this link: [here](#). It has been set up with single sign-on (SSO) access, so employees can use their Playtech email address and normal password.

Manual forms can be sent via email to the Playtech Compliance Team at: hospitality@playtech.com.

NAME OF PLAYTECH EMPLOYEE OR REPRESENTATIVE	
TITLE OF PLAYTECH EMPLOYEE OR REPRESENTATIVE	
DESCRIPTION OF THE GIFT, HOSPITALITY OR ENTERTAINMENT	
VALUE (ESTIMATE)	
NAME, AND TITLE OF PARTY RECEIVING/GIVING THE GIFT, HOSPITALITY OR ENTERTAINMENT	
NAME OF ORGANISATION	
IS THE PARTY A PUBLIC OFFICIAL?	
NATURE OF RELATIONSHIP WITH THE PLAYTECH GROUP	
REASON FOR THE GIFT, HOSPITALITY OR ENTERTAINMENT	

APPROVAL¹

NAME OF APPROVER: _____

TITLE OF APPROVER: _____

IS THE GIFT, HOSPITALITY OR ENTERTAINMENT APPROVED? _____

¹ Approval is only required from Playtech's Chief Compliance Officer when the gift value is in excess of £500, when the entertainment (per event) is in excess of £500 per person, or when the aggregate total exceeds £3,000 per person per year.