



Supplier Code of Conduct

Version 1.0

ALL-GUI-011

February 2023

The content provided herein is the exclusive property of the Playtech Group and is subject to copyright laws. Any redistribution or reproduction of part or all of the contents herein in any form is prohibited, except that you may download a copy of this policy for your personal and non-commercial use only. Subject to the preceding sentence, you may not distribute or commercially exploit the contents herein, nor may you transmit it or store it in any other website or other form of electronic system. You may not alter or remove any copyright or other notice from copies of this document. The information upon which this document is based is subject to future change. Updated versions of this document will be released, when necessary, resources permitting. The information in this policy is intended for informative purposes only and should not be construed as, nor relied upon as, legal advice.

CONTENTS

- 1 Playtech's Principles 1
- 2 Key Terms 1
- 3 Legal and Regulatory Compliance..... 2
- 4 Ethics and Business Conduct 2
- 5 Human Rights, Labour and Employment 2
- 6 Health, Safety and Well-being 3
- 7 Sustainability and Environmental Responsibility 3
- 8 Privacy..... 4
- 9 Business Processes and Continuity 4
- 10 Monitoring and compliance 4
- 11 Contact us 5

1 PLAYTECH'S PRINCIPLES

We believe responsible business practices are not just the right thing to do – they are critical to protecting our license to operate, and to delivering long-term, sustainable commercial success. That is why we continue to put ethical principles at the heart of our business.

We have a responsibility to uphold the highest standards of integrity and be fair and honest with our employees, customers, suppliers, partners, shareholders, and the wider community. Our values – integrity, innovation, excellence, and performance – are a vital part of our ethical business principles and are reflected in this Code.

With our Suppliers, we strive to create productive, efficient, and transparent relationships, which are built on trust, mutual respect, and common values. As such, we expect our Suppliers to share a common commitment to:

- Comply with applicable laws and regulations, and obtain and operate in accordance with all applicable permits, licenses and registrations;
- Behave ethically and with integrity;
- Respect human and employment rights;
- Promote the health, safety and well-being of employees;
- Embrace sustainability and operate in an environmentally responsible manner;
- Respect privacy and maintain confidentiality; and
- Implement systems to maintain business continuity and performance.

We have developed the following Code to set out our expectations of our Suppliers and to support our Suppliers in understanding them.

We expect Suppliers to acknowledge the expectations contained in this Code in writing and to agree to conduct their businesses in line with them. Suppliers are also expected to adopt appropriate formal policies and procedures to flow down these principles to their Employees, Associated Persons and supply chains. Further obligations to reinforce these principles may be formalised in the contractual documents governing the relationship.

If a Supplier fails to meet the expectations set out in this Code, Playtech may request the Supplier to take corrective action or, in the case of material breaches, reserves the right to terminate the business relationship.

2 KEY TERMS

In this Code:

- All references to "Suppliers" include any third-party providing goods or services to, for or on behalf of Playtech, including business partners, agents, contractors, consultants, representatives, and sponsors, wherever located.
- All references to "Employees" include all persons working for, or on behalf of, Suppliers in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, and interns.
- All references to "Associated Persons" include anyone providing services for or on behalf of Suppliers in support of Playtech's business, such as sub-contractors, or agents.

3 LEGAL AND REGULATORY COMPLIANCE

Suppliers to Playtech are expected to operate in full compliance with all applicable laws and regulations of the countries, states, and localities in which they operate.

Suppliers are also expected to obtain and maintain all applicable permits licenses and registrations, and operate in accordance with them, and conform to generally accepted industry standards.

4 ETHICS AND BUSINESS CONDUCT

We expect Suppliers to behave ethically and with integrity in all their operations. As well as, upholding our strong stance against bribery and corruption, consistent with the local and internationally applicable anti-bribery and corruption laws, we expect Suppliers to:

- Strictly prohibit bribery and corruption in all forms;
- Strictly prohibit Employees and other Associated Persons from offering, giving or accepting any financial or other advantage that is intended to, or that could be perceived as intending to, improperly influence a business, government or regulatory decision;
- Strictly prohibit tax evasion, facilitation of tax evasion, fraud and money laundering;
- Only give or accept gifts and hospitality that are reasonable in terms of value and frequency, and do not or could not be perceived as having an inappropriate or improper purpose;
- Conduct business free from financial or professional conflicts of interest and mitigate any such conflicts that arise;
- Apply fair business practices, including accurate and not mis-leading advertising, and abide by fair competition laws and practices;
- Safeguard against improper use of intellectual property, including disclosure of confidential or sensitive information;
- Maintain accurate books and records;
- Prevent insider trading;
- Enable employees to report concerns unlawful or unethical activities or behaviour without threat of reprisal, intimidation or harassment; and
- Maintain an environment of transparency, collaboration, and innovation.

5 HUMAN RIGHTS, LABOUR AND EMPLOYMENT

Suppliers should treat people with dignity and respect in line with all applicable local and international laws designed to protect human rights, counter modern slavery and promote the fair and ethical treatment of Employees. Suppliers are expected to:

- Prohibit discrimination in hiring and employment practices on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation;
- Prohibit a work environment that is free from harassment, intimidation or other forms of bullying and abuse;

- Not, directly or indirectly through their supply chain, participate in any form of modern slavery, human trafficking or use forced, involuntary or debt-bonded labour;
- Not withhold any identity documents or other personal legal documents from workers, other than where they can be readily accessed by workers at any time;
- Not use child labour under any circumstances and to comply with all applicable laws with respect to employment age limits and associated practices;
- Not treat or threaten to treat an individual harshly or inhumanely. Harsh or inhumane treatment includes sexual harassment or abuse, corporal punishment and/or coercion;
- Pay fair wages that meet or exceed legal minimum for all hours worked and communicate clearly any applicable conditions for payment or overtime and comply with all applicable requirements for working hours and benefits;
- Follow fair recruitment practices in compliance with local labour laws and encourage diversity and inclusion. Fair recruitment practices should include the prohibition of workers paying recruitment fees before, during or after a recruitment process. If any migrant worker is charged recruitment fees, then that worker shall be reimbursed;
- Provide written, understandable information about employment conditions; and
- Respect Employees' rights to:
 - bargain collectively without unlawful interference;
 - associate freely, join or not join organisations and to peaceful assembly;
 - rest and leisure and safe working conditions;
 - freedom of movement and freedom to leave their employment after reasonable notice; and
 - raise concerns in the workplace through a grievance mechanism.

6 HEALTH, SAFETY AND WELL-BEING

Suppliers are expected to comply with all applicable healthy and safety laws and regulations. We expect Suppliers to:

- Ensure a safe, hazard-free environment for Employees and all those on their premises; and
- Provide necessary facilities, procedures, training and equipment to assure the health, safety and well-being of Employees and visitors.

7 SUSTAINABILITY AND ENVIRONMENTAL RESPONSIBILITY

Suppliers are expected to operate in a sustainable and environmentally responsible way. As well as complying with all environmental laws, regulations and reporting requirements for environmental permits, Suppliers are expected to:

- Implement programs to understand and manage the environmental impact of their business operations;

- Work to reduce the environmental impacts of their operations including natural resource consumption, materials sourcing, waste generation, wastewater discharges, energy consumption, greenhouse gases emissions, and other air emissions; and
- Make reasonable efforts to publicly disclose topics and goals that are important to the organization's impact on the environment and social issues.

8 PRIVACY

Suppliers are expected to operate in compliance with all applicable laws and regulations governing data protection, security and confidentiality. We expect Suppliers to:

- Respect the privacy of Employees and others whose personal information they have access to, by complying with local and applicable international laws when collecting and storing personal information about Employees, business partners, consumers and others, such as birth dates, addresses and financial, and other information.
- Collect personal information only for legitimate business purposes, share only with those who are allowed access, protect in accordance with security policies, retain only for as long as necessary, and contractually obligate third parties with access to personal information to protect it.
- Implement and maintain processes and Code for data integrity and security to ensure that it is protected, complete and accurate.
- Respect Playtech and others intellectual property rights, and safeguard against improper use of intellectual property, including disclosure of confidential or sensitive information, such as trade secrets, pricing, Employee and customer information.

9 BUSINESS PROCESSES AND CONTINUITY

Suppliers should manage their operations systematically to maintain business continuity, meet this Code and to continually improve their operations. Suppliers are expected to implement processes to:

- Ensure any product/services meet specifications agreed upon in the applicable agreement, purchase order or other contractual relationship, as well as any minimum quality requirements, to ensure they are safe for their intended use and perform as intended, including in compliance with regulations where their products may be offered;
- Manage noncompliance, incident response and emergency situations related to products, business operations/continuity, including the reporting of such events to applicable regulatory authorities; and
- Promptly notify Playtech of any regulatory issues, such any notice of non-compliance, regulatory action, including any observations related to the products of any Playtech products.

10 MONITORING AND COMPLIANCE

Playtech may conduct monitoring, itself or by an appropriate third party, to confirm its supplier's compliance to this Code, including site assessments, questionnaires and reviews of publicly available information or other necessary measures either.

11 CONTACT US

Suppliers are encouraged to report any behaviour that may be in breach of this Code promptly. You may contact us via our independent anonymous Speak up line, [here](#), or using the freephone numbers available on the Speak Up landing page, available 24/7/365. Suppliers are also expected to direct any media enquiries relating to Playtech to Headland Consultancy, at playtech@headlandconsultancy.com.