



# Human Rights Policy

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# PREFACE

## POLICY STATEMENT

Playtech is committed to respect for human rights across its operations and supply chain. This is a core element of the Group's overall commitment to responsible business practices.

The Group remains committed to respecting and upholding the principles embodied in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The Group is committed to taking steps to ensure it is not complicit in the violation of human rights. This includes human trafficking and modern slavery which can occur in many forms, such as forced labour, child labour, bonded labour, domestic servitude, sex trafficking and workplace abuse.

Every employee has the responsibility to uphold the principles set out in this policy in addition to complying with the Group's Code of Conduct and Business Ethics. Employees are required to adhere to these principles, and to all related policies, practices and procedures.

## PURPOSE OF THIS POLICY

The purpose of this Policy is to:

- Set out Playtech's responsibilities, and the responsibilities of those working for and with Playtech, in observing and upholding Playtech's commitment to respect human rights; and
- Provide information and guidance to those working for and with Playtech on how to detect, prevent and respond to human rights risks and incidents of breach.

## APPLICATION OF THIS POLICY

This Policy applies to the Playtech group of companies, which means Playtech Plc as well as the subsidiaries of Playtech Plc (collectively referred to as 'Playtech' in this Policy).

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 and as agreed, 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 (collectively referred to as 'Business Partners' in this Policy).

Playtech may terminate its relationship with Business Partners, other individuals or organisations working on its behalf if they breach this Policy.

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

This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time. However, it is accepted as an integral aspect of the Playtech working environment and Personnel are trained to know it and, equally, be aware of the expectation that they are required to comply with the Policy.

This Human Rights Policy will also be provided to all new Personnel at induction. The Policy will also be made available on Playtech's secured shared sites.

Exceptions to this Policy are not permitted.

## OVERSIGHT OF THIS POLICY

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

Playtech's Sustainability and Compliance Board 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. More information on the Committee's remit, is available [here](#).

The Sustainability function, together with People & Culture team, have a primary and day-to-day responsibility for overseeing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring that processes are in place to audit internal control systems and procedures to ensure they are effective.

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 their responsibilities.

## COMPLIANCE MANAGEMENT

The Sustainability and Compliance Board Committee will review the use, effectiveness, and implementation of this Policy on an annual basis, considering its suitability, adequacy, and effectiveness. This includes a review of the Policy, relevant risk assessments and related improvements to controls that are identified as part of this process.

Playtech 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 Sustainability team.

Any risk of non-compliance with this Policy must be escalated to the Compliance and/or Legal team.

Further detail on how Playtech identifies, assesses and mitigates the risk of modern slavery and human rights abuses within our operations and supply chains is set out in our annual modern slavery statement, available [here](#).

## RELATED DOCUMENTS

This Policy should be read in conjunction with our Code of Conduct, included in the Business Ethics Policy, Personal Data Protection and Privacy Policy, Supplier Code of Conduct, Talent Acquisition Policy, Diversity, Equity, Inclusion and Belonging Policy, Bullying, Harassment and Respect Policy and Speak Up Policy.

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# 1 RESPECT FOR HUMAN RIGHTS

Human rights are inherent to all human beings, irrespective of their nationality, place of residence, gender, national or ethnic origin, colour, religion, language, or any other status or subcultural segmentation. The foundation of human rights is the idea that people have a right to be treated with dignity.

Human rights are often expressed and guaranteed by treaties or customary international law and/or incorporated into domestic law and private legal obligations.

In this Policy, we refer both to human rights risks and potential adverse human rights impacts. Human rights risks should be prevented or mitigated as far as possible. Where human rights risks materialise into adverse human rights impacts, they require remediation. Playtech's actions include:

- Implementing internal control systems and procedures to detect, prevent and respond to human rights risks and breaches in our operations as well as, where possible, in connection with our business relationships;
- Upon identifying potential human rights violations, Playtech shall thoroughly investigate and seek to understand/support remediation, where Playtech has been found to cause or contribute to adverse human rights outcome within its direct operations and business relationships; and
- Setting clear expectations and communicating as to how we address human rights risks internally and externally.

## 2 RESPONSIBILITIES

Playtech must:

- Identify where human rights risks are most salient and put in place processes to prevent and/or mitigate such risks.
- Promote physical and mental safety across all offices and where it operates in.
- Champion fair, equitable and non-discriminatory treatment of Playtech Personnel, respecting their rights and dignity.
- Provide adequate labour rights and working conditions as per local laws and engage only with Business Partners who uphold the same standards.
- Protect the data privacy of Personnel and Business Partners.
- Comply with local laws to support freedom of association, allowing employees to join, form or not join labour unions without fear of retaliation.
- Encourage open and constructive dialogue and resolution processes with employees and their representatives.
- Establish remediation processes for victims of human rights violations or modern slavery with Playtech's supply chain.
- Foster a culture of speaking up and implement effective grievance mechanisms.

### 2.1 PEOPLE & CULTURE

The People & Culture function is responsible for ensuring that workforce related human rights risks and mitigation measures are in place and part of relevant policies and human resource risk management processes across the employment lifecycle. Playtech's human rights and modern slavery expectations are communicated to Playtech Personnel.

## 2.2 PROCUREMENT

The Procurement function is responsible for ensuring that human rights risks, alongside other responsible business conduct, are considered in the tendering and vendor management process, including due diligence of suppliers. This function is also responsible for providing timely data and information to the Sustainability and Compliance Due Diligence functions for the purposes of identifying, managing and monitoring human rights risks.

## 2.3 LEGAL

The Legal function is responsible to ensure the inclusion of contractual requirements for third parties to explicitly oblige Business Partners, including third parties in their supply and delivery chains, as well as the rest of the commercial ecosystem to adhere to human rights and modern slavery regulations.

## 2.4 SUSTAINABILITY

The Sustainability function is responsible for identifying, managing and monitoring human rights risks within own operations and supply chain, as part of its annual risk assessment process. A risk assessment matrix is used to look at supplier sectoral risk, country risk and spend data, taking account of a number of external indices, including the UN Human Development Index, Freedom House's Freedom in the World Report, the US State Department Trafficking in Persons Report, the Global Slavery Vulnerability Index, ITUC Global Rights index, UNICEF Child Rights Atlas and the World Bank Worldwide Governance Indicators – Regulatory Quality.

## 2.5 COMPLIANCE

The Compliance Due Diligence function is responsible for conducting due diligence on third parties before entering into a business relationship with them using the information provided in the Supplier Due Diligence questionnaire. This questionnaire requires them to provide details of any policies, procedures, statements or programmes they have in relation to human and labour rights (including modern slavery). This enables Playtech to assess third parties' commitments to upholding human and labour rights. Due diligence on individuals and organisations is monitored on an ongoing basis using a centralised, automated portal, that is programmed to monitor and flag a range of compliance issues, including human rights and labour rights issues on a case-by-case basis to assess risk and actions required.

The Compliance team, working with the Sustainability, Risk and Internal Controls functions, will ensure that human rights risks and controls are regularly reviewed, documented, and reported through Playtech's risk management system.

## 2.6 SITE OPERATIONS

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 their responsibilities. Local Site Operations are responsible for ensuring that this Policy is transposed into local procurement and human resource processes and procedures.

## 2.7 WHAT WE EXPECT FROM YOU

Playtech Personnel and, where applicable Business Partners, must:

- Comply with all applicable national laws and regulations related to human rights wherever Playtech operates. Where national and international laws differ, Personnel should aim to follow the higher standard; where they are in conflict, you should adhere to national law, while seeking ways to respect international human rights to the greatest extent possible;

- Read, understand and comply with this Policy and never knowingly engage in any activity that might lead to non-compliance with this Policy;
- Report known or suspected violations of this Policy, in the first instance, to their line manager. Such violations can be further escalated to the Global Director of People & Culture, Chief Compliance Officer, General Counsel and/or the Playtech Speak Up line; and
- Comply with Playtech policies related to third party due diligence and inclusion of relevant ethics clauses in contracts with suppliers and third parties.

Management Personnel must ensure that their teams are familiar with and comply with this Policy.

## 2.8 POTENTIAL RISK AREAS

The following is a list of possible concerns that may raise human rights risks. They are illustrative of the types of issues that should be considered by Personnel and Business Partners in any activities taken for or on behalf of Playtech.

The list is not intended to be exhaustive and is for illustrative purposes only:

- Lack of awareness and understanding of human rights risks and relevant Playtech policies, processes, procedures and guidance;
- Inadequate organisational human rights risk governance and risk management;
- Instances of forced, bonded or involuntary labour in the supply of goods and services to Playtech;
- A recruitment fee, financial contribution or other form of financial loan is required for recruitment, processing or placement;
- Workers not provided with written terms and conditions of employment and benefits for their review before they begin working or that there are no safeguards in place to ensure that the offered terms and conditions of employment and benefits are maintained once work is commenced;
- Identity papers (for example, visas, passports, travel papers) are confiscated from workers or unduly interfering with their freedom to leave their employment after reasonable notice in accordance with the law;
- Workers are prevented from forming or joining trade unions or their right to collectively bargain is restricted other than in accordance with local applicable law. This includes instances of discrimination or harassment of worker representatives or their ability to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted by law, there should be parallel means for independent and free association and bargaining available;
- Working conditions are unsafe or adequate steps are not being taken to prevent accidents or injury to health and safety arising out of, associated with, or occurring during the course of work, by minimising, so far as is reasonably practicable, the causes of hazards in the working environment through management systems, regular training and any other relevant legal requirements. Where accommodation is provided it should be clean, safe and meet basic needs;
- Children or young workers below the age of 15 are employed or young workers between the ages of 15 and 18 are engaged in "hazardous work" other than in accordance with the provisions of the relevant International Labour Organization (ILO) standards;
- Wages are not paid regularly, on time, or in accordance with local law or contractual requirements; and
- Working hours are required beyond legal limits.

If you encounter any of these concerns, you must report them promptly using the procedure set out below.

### 3 ASKING QUESTIONS AND SPEAKING UP ABOUT HUMAN RIGHTS RISKS

Personnel and Business Partners are and should feel entitled to 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 undue criticism or retaliation. Any disclosures will be treated in a confidential, sensitive, and respectful manner.

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.

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 one of the following:

- Global Director of People & Culture
- Chief Compliance Officer
- General Counsel
- If the nature of the matter is such that you cannot raise it with any of the contacts identified above or, if you have followed the internal channels listed above and you still have concerns, you may contact our independent, confidential '*Speak Up Line*', which is provided by Convercent. It allows employees across the Playtech group to raise concerns in their native language via telephone or via a secure web portal. Where permitted by local law, employees may choose to remain anonymous when raising a concern. More details can be found in Playtech's [Speak Up Policy](#).