

# MODERN SLAVERY AND HUMAN RIGHTS STATEMENT

ALL-STM-001

May 2025

## 1 SCOPE

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the Act) and sets out the steps which Playtech has taken during the financial year ending 31 December 2024 and have planned for 2025 in order to prevent modern slavery from occurring in its operations and supply chain as well as plans for the future. This statement is made on behalf of Playtech plc and those of its subsidiaries that are required to report under the Act.<sup>1</sup>

## 2 BUSINESS OVERVIEW

Playtech is a leading technology company in the gambling industry providing online gaming and sports betting software including business intelligence driven gambling software, services, content and platform technology across the industry's product verticals, including casino, live casino, sports betting, virtual sports, bingo and poker. Playtech provides its technology on a Business-to-Business (B2B) basis to the industry's leading retail and online operators, land-based casino groups and government sponsored entities such as lotteries. Alongside its industry leading products and services, Playtech has worked with its licensees to raise industry standards in responsible business and safer gambling. Through Playtech Protect, Playtech has pioneered the use of research, data and artificial intelligence to develop products to identify at-risk customers and deliver tailored safer gambling interventions to customers.

In June 2018, Playtech acquired Snaitech, the leading sports betting and gaming brand in online and retail in Italy. Snaitech operates a B2B2C model as a service provider, allowing franchisees to utilise the Playtech technology stack in the retail environment while operating the leading brand, Snai, directly online as a Business-to-Customer (B2C) business. In 2024, Playtech announced the proposed sale of Snaitech, which was completed in April 2025. This represents a significant step in the Company's simplified business model and focused B2B strategy going forward.

Playtech plc is the parent company of the Playtech group (the "Group") and the head office is in the United Kingdom. The Group has c.7,000 employees across 19 countries; the list can be found in the [Responsible Business and Sustainability Addendum to the Annual Report 2024](#).

In its operations, the Group's supply chain primarily consists of software, technology and technology infrastructure products and services as well as professional advisory and support services. In 2024, the top three supplier countries by spend are the United Kingdom, Israel and Gibraltar.

## 3 COMMITMENTS

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

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<sup>1</sup> Playtech Software Limited, Playtech Services Malta Limited, Playtech Services (Cyprus) Limited, Best Gaming Technology GmbH, Snaitech SPA and VF 2011 Limited.

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 taking steps to ensure it is not complicit in the violation of human rights. This includes working to prevent modern slavery in its own business and supply chains. Modern slavery can occur in many forms, including forced labour, bonded labour, such as debt bondage through recruitment fees, child labour, domestic servitude, human trafficking and workplace abuse. The Company advocates for equal pay for equal work, promotes a healthy work-life balance by reducing excessive working hours.

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

## 4 POLICIES

Playtech has a Group Procurement policy aimed at mitigating compliance, ethical and climate-related risks, while ensuring that minimum standards are adhered to when entering joint ventures. In 2024, Playtech reviewed and updated its Procurement policy to strengthen its internal process related to fulfilling the company's sourcing needs and building sustainable commercial relations.

Playtech also conducted its annual refresh of its Anti-money Laundering and Counter-terrorist Financing and Anti-bribery and Corruption policies to enhance oversight and mitigate compliance, ethical and social risks when entering into business relations.

In 2023, Playtech published its Supplier Code of Conduct, which collates Playtech's expectations on supplier conduct and seeks suppliers' adherence to the Code, in light of evolving regulations and the need to meet expectations from businesses to work in a responsible, ethical manner. This Code requires suppliers to respect human and employment rights, promote the health, safety, and well-being of their employees, embrace sustainability, and operate in an environmentally responsible manner.

During 2024, Playtech reviewed and refreshed its Global Talent Acquisition policy, reinforcing Playtech's commitment to responsible recruitment, including pre-employment checks and transparency over the end-to-end process. Playtech's recruitment process involving migrant workers ensures that they do not pay recruitment fees, they receive written employment contracts outlining agreed terms and conditions, have access to their identity documents at all times, and face no unreasonable restrictions on their freedom of movement.

Furthermore, Playtech updated its Global Bullying, Harassment, and Respect policy to align with the requirements introduced by the Worker Protection (Amendment of Equality Act 2010) Act 2023. This amendment emphasises the Company's commitment to preventing workplace harassment, including third-party harassment, and ensuring a safe and respectful environment for all employees. The policy now includes enhanced measures to help managers and employees recognise and address harassment, fostering a more inclusive and supportive workplace culture.

The Group continues to support its workforce in hybrid working and communicated working arrangements to establish a safe and inclusive working environment for the office and remote working set up, addressing contractual working hours and overtime. The Global Hybrid working policy refers to training materials and channels of escalation for work-related health and safety hazards.

Playtech's Board Diversity policy is aimed to support its commitment to recruit from a diverse, qualified group of candidates with a mixture of skills, professional and industry backgrounds, geographical experience and expertise, gender, tenure, demographics, disability, ethnicity and diversity of thought, which are instrumental for the long-term success of the Company.

In 2025, the Company intends to continue to review and update its policies, including its Business Ethics, Board Diversity and Human Rights policies, as well as its requirements for suppliers and business partners.

## 5 GOVERNANCE AND ACCOUNTABILITY

Playtech's Sustainability and Public Policy Committee has ultimate responsibility for overseeing the Company's approach to human rights and its actions to mitigate modern slavery. The Committee is responsible for overseeing and reviewing Playtech's sustainability considerations and responsible business, as well as a status of compliance with laws, regulations and internal procedures and remediation actions, if modern slavery is found.

The Sustainability and Public Policy Committee also review the use, effectiveness, and implementation of the Human Rights policy every 12 to 18 months, considering its suitability, adequacy, and effectiveness.

In March 2025, the Board approved a structural change to the Sustainability and Public Policy Committee, expanding its remit to include regulatory and compliance matters under a new Sustainability and Compliance Board Committee.

## 6 RISK ASSESSMENTS

As a provider of software and technology services to the gambling industry, Playtech recognises that human and labour rights and modern slavery issues can occur in the technology sector supply chain. Playtech's most salient human and labour rights issues relate to employment, privacy and data protection, procurement of goods and services and AML, specifically ensuring that individuals involved in human trafficking and slavery are not laundering money through Playtech's operations. Key areas of focus for 2024 included commissioning an in-depth human rights risk assessment for Playtech's own operations and refreshing the human rights assessment for its suppliers.

Playtech commissioned a new human rights risk assessment for its own operations. The aim was to identify, understand, assess and put in place processes to mitigate high and medium potential human rights risks in the Company's current procedures. Playtech, using third-party consultancy experts, completed the following:

- A desk-based review drawing on existing sources and the Company's processes to determine where salient risks are most likely to occur in Playtech's own operations;
- A review of internal documents, including current policies and processes;
- A series of interviews with key stakeholders within the business;
- A data collection exercise from every relevant human resources function within each country of operation to investigate any potential inconsistencies in the management of policies and processes within the business; and
- A summary of the findings with key recommendations and actions organised by priority levels.

Ten risks were identified across five key topic areas; contracting, recruitment, response to upcoming legislation, live operations and joint ventures/acquisitions. In 2025, the business plans to focus on high and medium potential risks.

In 2024, Playtech continued to enhance its supplier risk approach to identify sectoral risks as well as risks from supplier geographical location. A risk assessment matrix was used, looking at sectoral risk, country risk and spend data to prioritise next steps. The Company has reviewed 150 supplier sectoral categories and has given a human rights and modern slavery risk rating from "low" to "high" to each category. The Group has identified 66 "high" and "medium" categories as priority categories. To identify country-specific risks, the Company took account of a number of external indices in its process, including the UN Human Development Index, Freedom House's Freedom in the World Civil Liberties, the US State Department's Trafficking in Persons report, the Global Slavery Vulnerability Index and the World Bank Worldwide Governance Indicators – Regulatory Quality, with the addition of the UNICEF Child Rights Atlas – Workplace Index. Using a combination of sectoral risks, country risks and a spend threshold, we have been able to identify the most relevant suppliers we wanted to engage with to mitigate any possible risks. In 2024, this group of suppliers represented 17.5% of our total spend.

In 2024, using the insights from the human rights risk assessment, Playtech continued its engagement with the suppliers flagged in a high-risk sector and located in a high-risk country through a self-assessment questionnaire to confirm that they continue to uphold the same standard as Playtech.

## 7 DUE DILIGENCE PROCESSES AND THIRD PARTIES

Playtech continues to implement and strengthen its approach to managing third parties as part of its compliance risk management programme. Playtech requires third parties (including suppliers, partners and customers) to complete a 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 and overview of controls and controls in place designed to uphold human and labour rights. Due diligence on suppliers, 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.

Playtech continues to require its customers, suppliers and other business partners to act in accordance with international human rights standards. To support this, Playtech uses contractual requirements to explicitly oblige suppliers and 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.

During 2024, the Company refreshed its human rights and modern slavery self-assessment questionnaire. The questionnaire includes questions for suppliers on their management systems, employee composition and labour practices. The analysis of responses enables Playtech to understand more about the ways in which our suppliers are managing their human rights risks within their own operations and supply chains. The questionnaire includes questions related to supply chain mapping, management of labour agents, outsourcing and subcontracting as well as their own due diligence, such as how they manage their recruitment processes. Playtech continued its engagement with the suppliers flagged as high-risk through our risk assessment process using a self-assessment questionnaire. Playtech expects suppliers to acknowledge the expectations contained in the Supplier Code of Conduct in writing and to agree to conduct their businesses in line with them.

## 8 ENGAGING WITH TRADE UNIONS AND WORK COUNCILS

Playtech respects and supports the rights of its employees to organise and participate in trade unions and work councils. Playtech actively and constructively engages with trade unions and work councils in a number of markets including Sweden, Italy, Germany and Austria.

## 9 TRAINING AND AWARENESS RAISING

Playtech has made this statement available to employees and stakeholders on the Playtech plc website and the Company's intranet. In addition, Group policy updates are communicated to staff via their local human resources focal points as well as through our annual compliance training programme.

During 2024, the Company continued to deliver a refreshed human rights and modern slavery mandatory training and awareness to all employees and contractors, with 98% and 100% completion respectively. Playtech also focused on broadening awareness and reach across the Group through targeted sustainability training and workshops, including modern slavery and human rights for relevant functional roles, including procurement, legal, finance and HR.

## 10 MONITORING AND REPORTING

In 2024, the Group continued to monitor and track potential human rights and modern slavery issues as part of its overall compliance risk management programme, and report on progress to the Sustainability and Public Policy Committee of the Board. The key performance indicators (KPIs) that are currently monitored include:

- Number of reports raised through the Speak Up/whistleblowing hotline;
- Number of reports raised directly with the HR function;
- Number of flags raised through the compliance KYC portal and monitoring tool;
- Number of risky suppliers identified following the human rights and climate risk assessments;
- Human Rights training completion rate for employees and contractors; and
- Number of ethical and human rights issues raised via joint ventures risk assessments.

When issues are identified, the Compliance function, with the support from HR on human rights in the workplace and the Sustainability team for human rights in the supply chain, reviews and defines the best course of action and resolution on a case-by-case basis.

The Group continues to promote an independent, confidential "Speak Up" line for employees, contractors and business partners to use to report any ethical or legal concerns, including human and labour rights concerns, anonymously, wherever permitted under local legislation. This is communicated via global campaigns, local human resource focal points and promoted during annual compliance training.

During 2024, Playtech had seven incident reports, anonymously submitted via the Speak Up platform. The Speak Up review process is led by the Chief Compliance Officer and General Counsel. Incidents raised during 2024 were reviewed and resolved within the year. The Company promoted this as an important channel for raising ethical concerns and will continue to do so in 2025. Suppliers and business partners are also encouraged to report any behaviour that may be in breach of the Supplier Code of Conduct promptly via the independent anonymous "Speak up" line or using the freephone numbers available on the Speak Up landing page. No human rights and/or modern slavery issues were raised via this channel in 2024.

Playtech will continue to report on measures it takes to identify and mitigate human rights and modern slavery risks as part of its annual sustainability reporting as well as its annual reporting as per the Modern Slavery Act in the UK and other relevant markets.

This statement was approved by the Board of Directors of Playtech plc on behalf of Playtech plc and as the management body for each reporting entity on 20 May 2025.

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CEO, Playtech plc