

SUPPLIER CODE OF CONDUCT

Version 2.0

ALL-GUI-011

August 2025

1 INTRODUCTION

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.

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.

2 OUR PRINCIPLES

With our Suppliers, we strive to create productive, efficient, and transparent relationships, which are built on trust, mutual respect, and common values.

This Supplier Code of Conduct outlines the expectations for suppliers in areas such as legal and regulatory compliance, ethics and business conduct, human rights, labour and employment, health, safety, and well-being, sustainability and environmental responsibility, privacy and data protection, and business continuity and monitoring.

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 across their own 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.

2.1 LEGAL AND REGULATORY COMPLIANCE

Suppliers 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.

2.2 ETHICAL CULTURE AND BUSINESS CONDUCT

We expect Suppliers to uphold a strong stance against bribery and corruption, also specified in Playtech's Business Ethics Policy. As such, we expect Suppliers to:

- Strictly prohibit bribery and corruption in all forms;
- Strictly prohibit tax evasion, facilitation of tax evasion, fraud and money laundering;
- 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;
- Handle sensitive data in compliance with global privacy laws (e.g., GDPR updates, U.S. state-level laws, APAC regulations); and
- Safeguard against improper use of intellectual property, including disclosure of confidential or sensitive information.

2.3 HUMAN RIGHTS, LABOUR AND EMPLOYMENT

We expect suppliers to be 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. Suppliers should respect human rights across their own operations and their supply chain 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.
- Ensure 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 or involuntary labour, and ensure workers have freedom of movement and freedom to leave their employment after reasonable notice.
- Not, directly or indirectly through their supply chain, participate in debt-bonded labour. As part of this, suppliers should put in place appropriate measures to ensure any workers recruited via third-party labour providers are not paying excessive recruitment fees anywhere along the recruitment process which may put those workers into debt-bondage.
- 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. In the absence of a local legal minimum wage, workers should be paid in line with the industry average.
- Ensure working hours are not excessive, meet local legal requirements and provide adequate breaks.
- Provide written, understandable information about employment conditions.
- Respect employees' rights to:
 - bargain collectively without unlawful interference;
 - associate freely, join or not join organisations and to peaceful assembly; and
 - freedom of movement and freedom to leave their employment after reasonable notice.
- Where no free and fairly elected trade union exists, suppliers should ensure workers have access to other forms of worker representation, such as a worker committee.
- Ensure all workers can raise concerns through an appropriate and confidential workplace grievance mechanism.

2.4 HEALTH, SAFETY AND WELL-BEING

Suppliers are expected to comply with all applicable health and safety laws and regulations in jurisdictions in which they are operating. 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.

2.5 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 in jurisdictions in which they are operating. In addition, suppliers are expected to:

- Implement programmes to understand and manage the environmental impact of their business operations including but not limited to: waste, water usage and wastewater discharge, energy usage, air emissions including greenhouse gas emissions.
- Set clear targets for emissions reduction and environmental impact reporting and report specific indicators to Playtech to support Playtech's environmental reporting.

3 MONITORING AND COMPLIANCE

Playtech may conduct monitoring, itself or by an appropriate third party, to confirm its supplier's compliance to this Code, including systematic desk research, self and on-site assessments, and reviews of publicly available information or other necessary measures. We expect suppliers to respond in an appropriate length of time to any issues raised.

4 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.