

# MODERN SLAVERY AND HUMAN RIGHTS STATEMENT

ALL-STM-001P

May 2026

## 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 2025 and have planned for 2026 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

Founded in 1999 and listed on the Main Market of the London Stock Exchange, Playtech is a leading global technology provider to the online betting and gaming industry. The Company operates on a Business-to-Business (B2B) basis, providing technology, content and services to leading retail and online operators, land-based casino groups and government-sponsored entities, including lotteries.

Playtech employs more than 7,400 people across 20 countries and operates in over 50 regulated and regulating jurisdictions worldwide. A full list of jurisdictions can be found in the [Responsible Business and Sustainability Addendum to the Annual Report 2025](#).

The Company provides proprietary end-to-end solutions spanning key gaming verticals including casino, live casino, sports betting, virtual sports, bingo and poker. Its technology enables customers to deliver innovative, seamless and responsible player experiences, supported by advanced player protection technology. Alongside its products and services, Playtech works with licensees to help raise standards in responsible business and safer gambling practices across the industry. Through Playtech Protect, the Company uses research, data and artificial intelligence to identify at-risk customers and support tailored safer gambling interventions.

Following the completion of the Snaitech sale in April 2025, Playtech transitioned towards becoming a predominantly pure-play B2B business.

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 2025, the top three supplier countries by spend are the United Kingdom, Israel and Gibraltar.

## 3 COMMITMENTS

The Group is committed to respecting 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's approach is informed by internationally recognised human rights standards, including 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 and taking steps to prevent and mitigate the violation of human rights within its own operations and supply chains, including the risk of modern slavery. Modern slavery can occur in

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<sup>1</sup> Playtech Software Limited, Playtech Services (Cyprus) Limited and VF 2011 Limited.

many forms, including forced labour, bonded labour, such as debt bondage through recruitment fees, child labour, domestic servitude, human trafficking and workplace abuse.

All employees are expected to uphold the principles set out in this statement and comply with the Group's Business Conduct Policy, together with related policies, practices and procedures. Employees are required to acknowledge and attest to these principles annually through the Group's compliance essentials training programme.

## 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 2025, 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. Updates included establishing criteria for identifying critical suppliers based on operational dependency, data sensitivity, lack of alternatives, contractual reliance, and compliance and ESG risks.

Playtech also completed its annual refresh of its Human Rights, Business Ethics, Anti-Money Laundering and Counter-terrorist Financing and Anti-Bribery and Corruption policies to strengthen oversight and mitigate compliance, ethical and social risks across its operations. The updates also reinforce expectations when entering into business relations, ensuring third parties meet the expected standards of integrity and responsible conduct.

In 2023, Playtech published its first Supplier Code of Conduct, which sets out Playtech's expectations on supplier conduct and seeks suppliers' adherence to the Code, in light of evolving regulations and the need for responsible, ethical business practices. 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. The Code was reviewed and refined in 2025 to ensure it continues to reflect emerging standards and regulatory developments.

During 2025, Playtech reviewed and refreshed its Global Talent Acquisition policy, reinforcing Playtech's commitment to responsible recruitment, including conflicts of interest, internal recruitment and promotion process 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. Playtech's Global Bullying, Harassment, and Respect policy reinforces the Company's commitment to preventing all forms of workplace and third-party harassment, while ensuring a safe, respectful environment for all employees.

Playtech is committed to ensuring a healthy work-life balance by limiting excessive working hours. Playtech continues to support the health, safety and well-being of its workforce in a hybrid environment by clearly communicating working arrangements and ensuring safe conditions for both office and remote working set ups, including expectations around contractual working hours and overtime. Its Global Hybrid Working policy provides training resources and escalation channels for work-related health and safety concerns. Playtech also reviewed its Global Benevolent Fund policy, first introduced in 2023, to offer financial assistance to employees facing unexpected and severe hardship.

Playtech upholds fair compensation for work of equal value, with remuneration practices free from discrimination on the basis of gender, race, or background. Playtech's Board Diversity policy also supports 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 2026, the Company intends to continue to review and update its policies, including its Global Grievance policy, Bullying Harassment and Respect policy, Diversity, Equity, Inclusion and Belonging (DEIB) and Board Diversity policies, as well as its requirements for suppliers and business partners.

## 5 GOVERNANCE AND ACCOUNTABILITY

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.

Playtech's Sustainability and Compliance Board 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 Compliance Board Committee also review the use, effectiveness, and implementation of the Human Rights policy every 12 to 18 months, considering its suitability, adequacy, and effectiveness.

## 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.

In 2024, 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 existing 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, Playtech developed clear action plans to strengthen its approach and address the findings from this assessment. Of these findings, the business managed to remediate six risks of high and medium priority, with the remaining four areas to be actioned in 2026.

During the year, Playtech continued to enhance its supplier risk profile to identify sectoral risks as well as risks from their 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 117 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 48 "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 2025, this group of suppliers represented 16.5% of our total spend.

In 2025, building on the insights from the human rights risk assessment, Playtech continued its engagement with the suppliers flagged in a high-risk sectors and jurisdictions (accounting for 3.5% of spend). A structured self-assessment questionnaire was used to evaluate that they continue to meet the same standards expected by 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 on the nature and countries of operation, as well as 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 in place designed to uphold human and labour rights. Due diligence on suppliers, individuals and organisations, is monitored on an annual basis using a centralised, automated portal. The portal 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 2025, Playtech issued its human rights and modern slavery self-assessment questionnaire to suppliers flagged as high risk through its risk assessment, requesting information on management systems, workforce practices and labour standards. The responses helped Playtech assess how suppliers manage human rights risks across their operations and supply chains, including supply-chain mapping, use of labour agents, outsourcing, subcontracting, and recruitment due diligence. Playtech continued engagement with these high-risk suppliers and requires all suppliers to formally acknowledge and operate in line with its Supplier Code of Conduct.

## 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 Austria, Brazil, Germany, Italy and Sweden.

## 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 People and Culture focal points as well as through the annual compliance essentials training programme.

During 2025, the Company continued to deliver a refreshed human rights and modern slavery mandatory training and awareness to all office-based employees and contractors, with 99.9% 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 People & Culture.

## 10 MONITORING AND REPORTING

In 2025, 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 Compliance Committee of the Board. The key performance indicators (KPIs) used to assess the effectiveness of the Group's approach include:

- Number of reports raised through the Speak Up/whistleblowing hotline;
- Number of grievance reports raised directly with the People & Culture function;
- Number of Benevolent fund applications and funds disbursed during the year;
- 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 People & Culture 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. The platform enables individuals to report concerns confidentially and, where permitted by local legislation, anonymously. This mechanism is designed to ensure that employees can raise issues without fear of retaliation and with confidence that their concerns will be handled impartially. This is communicated through global campaigns, annual compliance essentials training programme and leadership engagement.

During 2025, the Group received six incident reports through the Speak Up platform. All submissions were reviewed through a structured assessment process led by the Chief Compliance Officer and the General Counsel. Of these cases, five were investigated promptly and resolved within the same period, while one case remains under active investigation. Findings and lessons learned were shared with relevant business units to strengthen internal controls and reinforce expected standards of behaviour. 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 2025.

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 19 May 2026.

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CEO, Playtech plc