



Safer Gambling Policy

Approved by the Board

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1 POLICY STATEMENT

Playtech believes that safer gambling is a critical part of the long-term success of its B2B and B2C gambling operations as well as the sustainability of the industry as a whole. Playtech believes that the gambling industry can provide a safe and responsible form of entertainment. While the majority of people who gamble do so in a responsible and safe manner, we recognise that there are risks involved whereby gambling can cause harm and Playtech is committed to protecting its customers.

As a leading, global technology supplier to the sector, we recognise that we have an important role to play in developing technology solutions to address safer gambling challenges and raise standards across the industry. We believe that innovation in safer gambling is critical for keeping pace with regulatory, consumer and societal expectations to deliver a positive, safer online customer experience that people can trust. Innovation is critical, as we need to keep pace with expectations, reduce risk, maintain trust with our stakeholders and continue to be a viable business in the long term.

This is why Playtech has made safer gambling a core part of its long-term sustainability strategy. We have set out our ambition to be a trusted, global leader in safer products, data analytics and player engagement solutions to raise industry standards. Our commitments include:

- Increasing uptake of safer gambling technology, tools and solutions;
- Harnessing investment in R&D to advance the next generation of safer solutions and features, including responsible game design; and
- Strengthening safer gambling standards and technology across our operations.

In addition, this is underpinned by our commitment to adhering to safer gambling regulatory and licensing requirements in the countries in which we operate. Playtech is a proud signatory to the Betting and Gaming Council ('BGC') industry Safer Gambling Commitments, which aim to deliver long-term and fundamental change to how gambling companies empower, protect and support customers. The commitments cover 22 actions across five core areas, including:

- Preventing underage gambling, protecting young people, and customers deemed vulnerable.
- Increasing support for treatment of gambling harm.
- Strengthening and expanding codes of practices for advertising and marketing.
- Protecting and empowering customers (through product design and customer engagement).
- Promoting a culture of safer gambling.

2 POLICY APPLICATION

This Policy applies to employees of Playtech Plc and its gambling-related subsidiaries where Playtech holds the operating licence ('Playtech Group'). 'Playtech' is used in this document to mean any entity in the Playtech Group.

Where local responsible gambling laws and regulations apply in any country in which Playtech operates, those laws and regulations must be followed in addition to the requirements of this Policy. If any such local laws are not as strict as the terms of this Policy (including the laws and regulations referenced in it), then the terms of this Policy must be applied to the extent permitted by local law.

Any breach of this Policy may result in disciplinary action. This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time.

3 POLICY OVERSIGHT

Playtech has appointed a member of the Board of Directors and of its senior management to oversee this Policy. Playtech's Sustainability and Compliance Committee has overall responsibility for ensuring this Policy complies with Playtech's legal and ethical obligations, and that all those under its control comply with the Policy. The Committee is also responsible for approving this Policy, monitoring its effectiveness, raising risks to the Board of Directors and ensuring that appropriate actions are taken to mitigate such risks.

At the operational level, each relevant division is responsible for transposing and aligning this policy into operational procedures and overseeing the implementation, monitoring and effectiveness of those procedures. In addition, they are responsible for ensuring relevant staff are aware, trained and adhering to operational procedures.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Compliance.

4 VERSION CONTROL

This policy will be reviewed at least yearly from the last time that it was reviewed. If there have been any changes in the regulations or legislation. If there are any updates or changes in any studies of Playtech.

5 TRAINING

Employees must be aware of their obligations and responsibilities relating to safer gambling. This information is delivered to all employees as part of induction and annual compliance training.

Employees in operational and customer-facing roles must also participate in additional safer gambling training. This includes, but is not limited to, Customer Service, chat moderators, VIP Customer Managers, key roles within Live Casino, and Personal Management Licence Holders. These employees will be trained on a number of elements of safer and problem gambling including:

- Regulatory and licensing requirements.
- How to recognise and interact with people exhibiting behavior that is indicative of problem gambling.
- How to manage and escalate issues that relate to their respective responsibilities.

Safer gambling training is conducted face-to-face or online, as appropriate.

Furthermore, the relevant operational and/or functional divisions shall maintain a written record of all training provided and awareness measures taken.

6 SAFER GAMBLING IN B2C OPERATIONS

In divisions where Playtech is operating B2C operations in the retail and/or online environment and holds an operating licence, the relevant Head of Operations is responsible for ensuring that robust procedures and management controls are in place to ensure the operations are complying with all relevant licensing codes and conditions of practice.

In addition, B2C operations must implement a plan to adhere to voluntary codes of conduct including the industry Safer Gambling Commitments.

6.1 B2C OPERATIONAL PROCEDURES

B2C operational procedures and systems should cover all aspects of safer gambling and, at a minimum, include the following:

- An accountable, designated individual within the operations with responsibility for ensuring that gambling-related harm is minimised.
- Player education and awareness programmes about safer gambling including visible, accessible safer gambling information for customers.
- Procedures for implementing responsible gambling tools – including provision of existing and new tools to support safer gambling including information about blocking software, bank blocking tools and national self-exclusion schemes.
- Player risk assessments to identify at risk and problem gamblers using:
 - Customer registration information.
 - Self-exclusion and time out data.
 - Gameplay data.
 - Affordability and/or Financial Vulnerability Checks.
 - Data on complaints and disputes in place to identify individuals who may have a gambling problem.
- Customer interaction procedures which are designed to be based on a customer's risk profile. The risk that a customer might be experiencing harm from gambling must be placed above commercial considerations including when dealing with high spending/VIP customers.
- A procedure for responding to third party notice of a customer experiencing harm from gambling.
- Logging of customer interactions and complaints.

6.2 SAFER GAMBLING CONTROLS FOR VIP/HIGHER VALUE CUSTOMERS ('HVC')

For HVC or VIP customers, B2C operations must undertake **'full customer assessments'**¹ before offering any VIP/HVC incentives, rewards or special treatment. These checks will be regular and ongoing and commercial pressures will never override welfare considerations. Teams that operate HVC/VIP Rewards Programmes will not receive remuneration or bonuses based on an individual's loss and/or spend.

18 to 24-year olds will only be considered for joining VIP/HVC schemes in exceptional circumstances and with the sign off of a senior manager who is also a PML holder.

This will only be allowed if the regulation allows VIP/HVC. If the jurisdiction does not allow it we will not offer it. Existing VIP/HVC scheme members aged between 18-24-year-old will only be allowed to stay as VIP's following a full customer assessment and with senior management sign-off. Senior management is defined as an individual holding a personal management licence (PML).

VIP/HVC reward programmes will maintain full audit trails and have clear lines of senior oversight and accountability for their conduct.

¹ Full customer assessments include checks on the sustainability of player spend, a safer gambling check, a negative information review and KYC check.

VIP/HVC reward programmes will be conducted with consistent, clear and transparent good practice to prevent gambling-related harm.

6.3 SAFER GAMBLING TOOLS

Playtech recognises the importance of providing appropriate responsible gambling tools accessible to players at all times, in line with any jurisdictional requirements. Examples of tools that we provide are:

- Deposit limits
- Wager limits
- Time limits and reality checks
- Interview questionnaires
- Having a break from gambling covering Self Exclusion, cool offs etc

7 RETAIL OPERATIONS

Where Playtech is operating retail operations, the relevant Head of Operations is responsible for ensuring that robust procedures and management controls are in place to ensure the operations are complying with all relevant licensing codes and conditions of practice.

Retail operational procedures should include systems and controls to identify at risk and problem gamblers based on all available information, including:

- Gaming machine data and/or implementing effective systems to track registered play on gaming machines.
- Self-exclusion data.
- Data on complaints and disputes.
- Staff observations of the customer's behavior and any interactions with them.

8 ADVERTISING AND MARKETING

Where Playtech operations are involved with marketing and advertising of gambling products and services to consumers, we are committed to ensuring that promotions and terms and conditions are transparent, visible and clear to players, and that the advertising of games and related promotions do not have particular appeal to children, young people and other vulnerable individuals.

Advertising and promotions must be compliant with the relevant regulatory and advisory codes of practice including the Licensing Conditions and Codes of Practice (LCCP) and Codes issued by the Advertising Standards Authority (ASA) and the Industry Group for Responsible Gambling (ICRG).

Customer risk profiles must be taken into consideration when deciding on the type and frequency of marketing communications. This can also apply to land-based operators where the operator holds customer data and sends the customer marketing communications.

When using affiliates, operations must have effective systems and controls for overseeing affiliates and ensuring they are complying with regulatory and licensing requirements.

For advertising, promotions and marketing online, operations must:

- Define a common list of industry negative search terms (extended to affiliates) to be shared with search engines, along with a list of sites for suppression for the purposes of de-targeting in display so that advertising does not appear on sites with content that could have particular appeal to under 18s or vulnerable people, all frequently reviewed, updated and shared on an on-going basis;

- Use of customer data to de-target paid-for ads from vulnerable groups across social media platforms, and work with the platforms to identify ways to do this more easily and effectively;
- Implement +25 age-targeting in social media and “Pay Per Click” advertising where platform facilities permit, to increase confidence in the social media platform’s own age-gating, which is currently based on self-certified data and relies on the honesty of the user;
- Implement consistent voluntary age-gating on YouTube channels and content;
- Adopt good practice guidelines for responsible digital marketing; and
- Adopt and roll out to all affiliates a code of conduct which is consistent with industry best practice.

For more information on advertising and marketing, see the **Responsible Advertising and Marketing Policy**.

9 SAFER GAMBLING IN B2B OPERATIONS AND SERVICES

As a leading software and technology provider to the gambling sector, Playtech has an important role to play in raising safer gambling standards across the industry. Our software provides tools to enable our players to gamble safely and responsibly.

Playtech provides a platform and range of technology tools to enable our licensees to implement safer gambling controls, interact with customers and promote a safer customer journey. Playtech is investing, developing and offering safer gambling tools, data and services that can help raise industry standards to:

- Promote responsible game design
- Promote safer and responsible play.
- Empower licensees and players with advanced customer engagement and responsible gambling tools to reduce harm.
- Improve the quality and use of data to reduce harm.
- Continually develop BetBuddy (Playtech’s safer gambling analytics tool) to accurately identify at-risk players at the earliest possible opportunity and provide insights that can support the most effective operator interaction. Playtech will continue to further embed safer gambling tools and functionality into the products and services we provide to licensees. Product teams will monitor player activity to identify signs that may indicate a player is at-risk. For example:
 - a. Where Playtech offer chat functionality, such as for bingo and live casino, chat will be monitored for keywords and statements that may indicate the player is experiencing harm. If this is detected, the operator will be notified, and Playtech may apply restrictions to the player’s chat functionality pending the operator’s investigation.
 - b. In poker, in addition to monitoring gameplay for integrity and AML reasons, Playtech will report any activity that indicates a player might be at risk of gambling-related harm to the operator for further investigation.

10 SAFER GAMBLING: ETHICS AND ARTIFICIAL INTELLIGENCE, DATA PROFILING AND AUTOMATED DECISION MAKING

As part of Playtech's adoption of Artificial Intelligence (AI) based opportunities and technologies, and the company wide use of Data Profiling and Automated Decision Making (ADM), we are committed to enforcing privacy by design across systems, as well as building trust with users as much as relevant stakeholders and regulators. We will always endeavour to ensure that our AI/ADM based products and services are developed and designed to enable compliance with regulations and ethical standards.

We will always aim to stay transparent and accountable, and minimise the data used whilst embracing good data stewardship and governance processes to ensure we are delivering meaningful AI/ADM and Profiling solutions that help our clients and players tackle any of the new challenges ahead.

Playtech will at all times endeavour to assess the impact of incorrect AI based predictions and, when reasonable, design systems and software with the capability for human intervention for all AI and ADM/Profiling processes in mind.

11 RESPONSIBLE GAME DESIGN

Playtech is committed to delivering products and a player environment to protect, empower and make it easy for customers to play safely and stay in control. As a content and product provider to the industry, Playtech is committed to the following principles:

- Design games and other content that deliver at least baseline compliance against all relevant and related jurisdictional regulatory standards and requirements
- Build understanding, awareness and capabilities amongst our game designers, content studios and product developers so they are equipped to identify and assess game features and attributes for potential harm to at risk or vulnerable players and implement new frameworks for game design and labelling. Playtech will build capabilities amongst its game designers to ensure they can better understand gambling-related harm in order to integrate safety into game design as well as contribute to new ideas in this arena.
- Research and test ways to understand, identify and assess whether there are high-risk features in our games that should be removed, moderated or compensated-for by recommending operators apply strong safer gambling features at the game/player-level (such as enforced breaks in play).
- Apply game level insights and data to produce more effective, clear and consistent product labelling and product information to help licensees offer personalised information to players and enable players to make informed choices about game and product risk.
- Collaborate with industry peers and academic community on responsible game design; contributing to the development of an industry wide approach for game design and labelling. We are also committed to sharing our research and insights with stakeholders; including the research and regulatory community.

As gambling is inherently risky, Playtech is committed to developing products to minimise the risks to players by ensuring they help to support safer gambling. Our principles are built around the following themes:

- Game Characteristics

- Informed Player Choice
- Enhancing Control
- Safe and Fair Environment
- Governance and Continuous Improvements

Playtech will continuously seek to make our products safer by:

- **Game Characteristics**

- Establishing and maintaining a dedicated Sustainable Product & Game Design Working Group, comprised of experts from product, technology and game studios.
- Conduct and contribute to industry research and follow an evidence-based approach to development.
- Where we develop innovative game features or elements, we will review them internally and identify any safer gambling considerations and mitigations, even if it means the game takes longer to reach the market. This will also include supporting post-release evaluations in collaboration with the B2C operators who have access to player data.
- Supporting the testing and evaluation of new features where there are uncertain but possible implications for player risk in collaboration with the industry trade bodies and B2C operators who have access to player data (where intellectual property rights are not infringed).
- Deploy training to games development staff on the principles of safer gambling in the context of game design.

- **Informed Player Choice**

- We will provide information to our partners and players that clearly explain how products work and encourage safer play.
- Game operation and rules, mathematical properties such as expectation and risk, and best strategies must be clearly set out and readily accessible so that licensees can provide this to the customers.
- Games will be designed to be clear and transparent to players and will not mislead them about the likelihood of winning or how they work.

- **Enhancing Control**

- We will look to continuously innovate and build new safer gambling products and features and improve the level of control offered to players whilst gambling.
- Games will be designed and tested robustly to ensure they operate according to their rules and provide players with fun and fair games that they can trust.

- **Safe and Fair Environment**

- We will ensure our games do not target people under the age of 18 (eighteen) and/or comply with local requirements related to legal age of gambling.
- We will continually monitor the processes and technology use to prevent access to our platforms by vulnerable people. We will strengthen these controls where we identify more robust and effective solutions.
- We will develop marketing assets related to games that uphold their responsible marketing obligations.
- We will provide licensees with the information so they can ensure the marketing of, and terms and conditions of games are clearly explained and do not mislead players.

- **Governance and Continuous Improvements**

- We will review the above principles regularly and in line with industry and regulatory developments; recognising that the research base and player requirements around sustainable content are continually developing. We expect these principles to be continuously improved.

12 SAFEGUARDING EMPLOYEES

The health, safety and wellbeing of Playtech employees is of paramount importance. As part of this commitment, Playtech consistently works towards protecting vulnerable or at-risk employees, including those exhibiting, and/or potentially affected by, gambling-related harm.

- Gambling during working hours, or encouraging others to gamble during working hours, is not permitted. Breaches of this policy will be handled in accordance with the company disciplinary policy.

We recognise that employees may engage in gambling outside of working hours and as an employer we are committed to:

- Assisting employees who may be experiencing problem gambling behavior.
- Raising awareness through information and resources available for employees who gamble;
- Should employees choose to gamble in their spare time, we advise following these guidelines:
 - Set financial and time limits before you commence gambling;
 - Gambling is not advised if it interferes with your daily commitments;
 - Gambling is not advised if you are in recovery for any dependency or are under the influence of alcohol or any other substance;
 - Gambling is not advised if your primary aim is to repay your debt with your winnings.

Playtech will provide employees with information about gambling-related harm and relevant sources of internal and external support. This information will be accessible and visible to employees in case they are concerned about their gambling behaviour, or that of a colleague or family member.

Employees are encouraged to report to their line manager as soon as possible if they show signs of problem gambling/have taken steps to stop gambling or know of another employee who may be experiencing gambling-related problems. This will allow the company to offer or provide the necessary support.

The local HR focal points will work with the nominated safeguarding lead to ensure that employees and team leaders are provided with training on how to identify staff exhibiting at-risk gambling behaviour, the procedures for escalating concerns and how best to support those employees.

The HR departments in the countries where Playtech operates will establish and maintain procedures for supporting employees affected by gambling-related harm in cases where HR:

- observes staff experiencing gambling-related harm;
- is approached by an employee about a colleague experiencing gambling-related harm.
- is notified by a third party (friend, family member, etc.) about an employee suffering from gambling-related harm.

If you or anyone close to you is affected by gambling problems your local People and Culture team can provide confidential advice to help you find local support.

There are also a number of companies who provide software which block individual computers from accessing gambling internet sites. These include:

- Betblocker – www.betblocker.org

- GamBan – www.gamban.com
- Gamblock – www.gamblock.com

13 SUPPORTING RESEARCH, EDUCATION AND TREATMENT

Playtech is committed to providing strategic, financial and in-kind support to charities dedicated to delivering education, prevention and treatment of problem gambling.

Each year, Playtech allocates a donations budget dedicated to research, education and treatment and then reviews the effectiveness and outcomes from its donations.

Eligible organisations can include charities, research organisations, social enterprises, academic institutions, public-private partnerships, and non-profit organisations.

Before donating to an organisation, Playtech conducts due diligence and engages with the organisation(s) to jointly define programme scope, metrics and KPIs, and a delivery plan.

Programmes undergo a review process to evaluate their effectiveness and support the sharing of good practice.

14 REGULATORY AND STAKEHOLDER ENGAGEMENT

Playtech actively engages with regulators and policymakers on a wide range of compliance and public policy issues. Our Regulatory Affairs and Compliance Team monitors current and emerging policies, as well as any changes and advancements in regulations within the industry. Playtech is part of the Spanish Responsible Gambling Advisory Council, which was recently created as a working group in which experts of recognised prestige and experience participate to advise and improve responsible gaming measures.

APPENDIX A RELATED DOCUMENTS

- UK B2C Safer Gambling operational procedures
- Responsible Advertising and Marketing Policy
- ASA CAP and BCAP Codes
- Industry Group for Responsible Gambling - Gambling Industry Code for Socially Responsible Advertising - 7th Edition (Updated) March 2025
- iPoker responsible gambling procedure
- Eurolive responsible gambling procedure
- BGC Industry Safer Gambling Commitments
- BGC Game Design
- BGC Code of Conduct: High Value Customer VIP Reward Programmes