



Human Rights Policy

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PREFACE

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.

SCOPE OF THIS POLICY

This Policy applies to the Playtech group of companies covering all geographies of operation, 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 suspend or 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.

POLICY STATEMENT

Playtech 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 many forms, such as 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 policy and comply with the Group's Business Ethics 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. 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.

RELATED DOCUMENTS

This Policy should be read in conjunction with:

1. Supplier Code of Conduct
2. Modern Slavery and Human Rights Statement
3. Business Ethics Policy
4. Personal Data Protection and Privacy Policy
5. Speak Up Policy
6. Grievance Policy
7. Diversity, Equity, Inclusion and Belonging Policy
8. Health and Safety 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. They are founded on the idea that all individuals are entitled to be treated with respect and dignity.

Human rights are articulated in international treaties and customary international law and are implemented through domestic legal obligations.

In this Policy, Playtech refers both to human rights risks and adverse human rights impacts. Human rights risks should be identified, 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;
- Investigating potential human rights violations, and where Playtech has caused or contributed to an adverse human rights impact, provide for or cooperate in remediation in line with applicable standards; and
- Setting clear expectations and communicating as to how Playtech addresses human rights risks and impacts both internally and externally.

2 POTENTIAL HUMAN RIGHTS RISKS

Playtech recognise that our most salient human rights risks arise from the nature of our digital products and online gambling services, our use of data and technology and our global supply chain. The Company prioritises the following areas where risks are most likely to occur or where impacts could be most severe.

2.1 RESPONSIBLE USE OF PRODUCTS AND SERVICES

- Risks linked to problem gambling and addiction, including financial harm and impacts on mental health
- Ethical design of digital platforms (e.g. avoiding exploitative or manipulative design practices)
- Preventing the use of services for financial crime, fraud, or exploitation
- Ensuring player protection, including age verification and safeguards for vulnerable users
- Heightened protections for vulnerable groups, e.g., individuals at risk of gambling harm or addiction, children and young people and individuals in financially vulnerable situations

2.2 DATA PRIVACY AND DIGITAL RIGHTS

- Protection of personal data, including sensitive behavioural and financial information
- Responsible use of AI, algorithms and data analytics, particularly in customer profiling and targeting

2.3 NON-DISCRIMINATION AND INCLUSION

- Preventing bias in decision-making processes
- Ensuring equal access to products and services, including for vulnerable or excluded groups

- Uphold fair compensation for work of equal value, with remuneration practices free from discrimination on the basis of gender, race, or background
- Fostering a culture of speaking up and implement effective grievance mechanisms

2.4 LABOUR RIGHTS IN OPERATIONS AND SUPPLY CHAIN

- Risks of forced labour, child labour and exploitation in global supply chains (e.g. technology hardware, outsourced services)
- Fair treatment of contracted and shift-based workers, including customer support and live operations
- Ensuring fair wages, working hours and safe working conditions as per local laws and engage only with Business Partners who uphold the same standards

2.5 FREEDOM OF ASSOCIATION

Playtech respects and supports the rights of its employees to organise and participate in trade unions and work councils without fear of retaliation.

Playtech actively and constructively engages with trade unions and work councils in a number of markets including Austria, Brazil, Germany, Italy and Sweden.

3 GOVERNANCE AND RESPONSIBILITIES

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](#).

This Policy is delivered through cross-functional collaboration between People & Culture, Procurement, Legal, Compliance and Sustainability, with clear day-to-day ownership to ensure effective oversight and accountability.

Management Personnel at all levels are responsible for ensuring that their teams understand and comply with this Policy and are given adequate and regular training on their responsibilities.

3.1 EMPLOYEES AND BUSINESS PARTNERS

Playtech Personnel and 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.

Examples of concerns:

- Lack of awareness of human rights risks or relevant policies
- Weak human rights governance or risk management
- Forced, bonded, or involuntary labour
- Recruitment fees or financial obligations linked to employment
- Absence of clear or honoured employment terms
- Retention of identity documents or restrictions on leaving employment
- Restrictions on freedom of association or collective bargaining
- Unsafe working or living conditions
- Child labour or hazardous work involving young workers
- Non-payment or delayed payment of wages
- Excessive or unlawful working hours

If any of these concerns are identified, they must be reported promptly in accordance with the procedure set out below.

4 DUE DILIGENCE FRAMEWORK

Playtech's approach to human rights due diligence is aligned with internationally recognised frameworks (such as the UN Guiding Principles on Business and Human Rights) and includes the ongoing identification, prevention, mitigation, tracking and communication of human rights risks and impacts.

4.1 RISK IDENTIFICATION AND ASSESSMENT

The Sustainability function is responsible for identifying and monitoring human rights risks across the Company's operations and supply chain.

It regularly commissions human rights risk assessments for its own operations to identify and evaluate potential impacts and to implement appropriate processes to mitigate risk areas identified within existing procedures.

In addition, the function conducts an annual human rights risk assessment of suppliers, using a risk-based matrix that considers sector, geography and spend-related factors to prioritise due diligence and mitigation actions. The assessment considers critical suppliers based on operational dependency, data sensitivity, lack of viable alternatives, contractual reliance, and exposure to compliance and ESG risks.

Further detail on how Playtech identifies, assesses and mitigates the risk of modern slavery and human rights abuses across its operations and supply chains is provided in the Company's annual Modern Slavery Statement, available [here](#).

The Compliance Due Diligence function is responsible for conducting due diligence on third parties before entering a business relationship with them. This process utilises the information provided in the Supplier Due Diligence questionnaire, in conjunction with the Group's established suite of B2B Due Diligence Risk Assessment Methodologies and other relevant operational frameworks. This questionnaire and the accompanying methodologies require 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.

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 incorporated into Playtech's enterprise risk management processes.

4.2 INTEGRATION AND ACTION

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.

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 direct integration into established companies risk matrices prior to third-party onboarding. This ensures comprehensive oversight for the purposes of identifying, managing and monitoring human rights risks.

The Supplier Code of Conduct sets out Playtech's expectations on supplier conduct and seeks suppliers' adherence to the Code. 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 is regularly reviewed and refined to ensure it continues to reflect emerging standards and regulatory developments.

The Legal function is responsible for ensuring that ethical contractual requirements are incorporated into agreements with Business Partners. These requirements oblige Business Partners, including entities within their supply and delivery chains, to comply with applicable human rights and modern slavery laws and standards.

4.3 MONITORING AND TRACKING

The Group monitors and tracks potential human rights and modern slavery risks and the effectiveness of its human rights due diligence processes through a combination of internal controls, key performance indicators, and periodic assessments. This includes evaluating the implementation of mitigation actions, reviewing identified risks and ensuring that appropriate measures are in place to address any adverse impacts. 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 tools and established due diligence risk assessment methodologies
- Number of higher-risk suppliers identified through human rights and climate risk assessments
- Human rights training completion rates for employees and contractors
- Number of ethical and human rights issues identified through joint venture risk assessments
- Number of and outcome from legal and regulatory cases

4.4 COMMUNICATING AND REPORTING

The Group is committed to transparent communication and reporting on its human rights approach, including disclosing relevant information through its annual Modern Slavery Statement and other public reporting, as well as providing regular updates to the Sustainability and Compliance Board Committee to support oversight and accountability.

5 SPEAK UP AND GRIEVANCE MECHANISMS

An important aspect of this commitment to transparency is providing a way for Personnel and Business Partners to voice concerns about anything they find unsafe, unethical or unlawful. These mechanisms must be accessible, independent of line management, and must enable Personnel to voice concerns in a responsible, appropriate and effective manner without fear of criticism or retaliation. Any disclosures will be treated in a confidential, sensitive, and respectful manner.

Playtech has a grievance procedure for concerns related to personal employment circumstances, such as your contract terms, pay, workload, or issues involving a peer or manager available to Personnel. The 'Speak Up' process is designed to report concerns regarding suspected serious wrongdoing (unsafe, unethical or unlawful behaviour) that affects the wider organisation or the public interest.

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, 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*'. It allows Personnel and Business Partners 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](#).

6 REMEDIATION AND CORRECTIVE ACTIONS

Where adverse human rights or modern slavery impacts are identified, the Group is committed to taking appropriate and timely action to address and remediate such impacts.

All reported or identified concerns are assessed on a case-by-case basis by the Compliance function, with support from the People & Culture team for workplace-related matters and the Sustainability function for supply chain-related issues. This assessment considers the severity, likelihood, and potential impact of the issue, and determines the most appropriate course of action.

Corrective actions may include, but are not limited to, strengthening internal controls, enhancing due diligence processes, engaging with suppliers or business partners to drive improvements, or terminating relationships where necessary. Where the Group has caused or contributed to an adverse impact, it will seek to provide or cooperate in appropriate remediation.

Progress against corrective actions is monitored through the Group's compliance risk management processes and, where relevant, escalated to internal governance bodies to ensure appropriate oversight and accountability.

7 TRAINING AND AWARENESS RAISING

Playtech is committed to promoting awareness of human rights and modern slavery risks across the Group. This Policy is made available to Personnel and Business Partners via the Playtech plc website and the Company's intranet.

Updates to Group policies are communicated to employees through local People & Culture representatives and supported by the annual Compliance Essentials training programme.