Doing the right thing
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Integrity means doing the right thing even when nobody is watching.

C.S. Lewis
A message from our CEO

At Entain we have set out a bold and ambitious purpose for our business: to revolutionise betting and gaming to create the most exciting and trusted entertainment for every customer. In practice, delivering that purpose means: putting our customers' interests at the centre of every decision we make; promoting a best-in-class approach to corporate governance and the operation of our financial affairs; making Entain the best place to work by creating an inclusive and rewarding environment; and supporting the communities in which we operate.

Ultimately, our success and our reputation depend on how we conduct ourselves as individuals and as a business. This Code of Conduct is a summary of the standards, policies and principles of fair play, honesty and integrity that underpins Entain. It sets out what we expect from everyone who works for us and from those whom we do business with.

Please take the time to read and understand it, and if you feel something isn’t right, or if you are ever in doubt about the right thing to do, please speak to your line manager or use our Speak Out policy and let us know. We are committed to upholding the highest standards in everything we do.

**Jette Nygaard-Andersen**  
CEO, Entain plc
Ten guiding principles

1. We take all allegations of malpractice and misconduct seriously and will deal with individuals’ concerns confidentially and sensitively.

2. We do our best to resolve all work-related issues fairly and quickly.

3. We are committed to helping our customers gamble responsibly.

4. We abide by the highest standards of financial and business conduct, and will never tolerate bribery, money-laundering, conflicts of interest, tipping-off, anti-competitive practices or unauthorised share dealing.

5. We don’t discriminate on the basis of age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership.

6. We promote equality, diversity and inclusion in all our working practices.

7. We act with tolerance and empathy. There is no place in our company for bullying, harassment, victimisation, violence, threats of violence or abuse of any kind.

8. We are committed to providing a safe work environment that promotes our people’s safety, health and wellbeing.

9. We make every effort to protect personal and confidential information relating to our employees, customers and suppliers.

10. We work hard to reduce our business’ environmental impact and make it as easy as we can for our colleagues to do the same.
It’s down to all of us

We want to be known as a responsible company that our employees are proud of and our customers, partners and suppliers can trust. This Code of Conduct and our ten guiding principles reflect who we are and what we stand for. We expect everyone who works for us or does business with us to abide by them*.

Make sure you read this Code of Conduct and the detailed policies and procedures that support it. You can find these on our intranet.

If you lead a team, your people will look to you as their role model for doing what’s right. It’s also up to you to make sure your team understands this Code of Conduct. Remember that our standards are more than just words on a page; they only have meaning if you hold yourself and your team accountable for living up to them every day.

* Due to different legal requirements in some of the countries we operate in, there may be minor local variations to this Code. Where applicable, these will be communicated separately on a country-by-country basis, but the basic assumption should be that this version of our Code of Conduct applies to everyone. If there is any conflict between our Code of Conduct and local laws or custom and practice, whichever contains the higher standard of conduct will apply (while still ensuring legal compliance as a minimum).
Speak out

If you think there has been a breach of our Code of Conduct, or see behaviour that might be illegal or unethical, please speak out and let us know as soon as possible. We can only investigate a possible breach if we know about it.

You don’t need to be 100% sure of your facts so long as you have reasonable grounds for suspecting that wrongdoing has (or might) take place.

We know that it can take courage to do the right thing, which is why we promise to treat reports sensitively and confidentially.

We will never penalise somebody who raises a genuine concern, even if it turns out that no wrongdoing took place.
We take all allegations of malpractice and misconduct seriously and will deal with individuals’ concerns confidentially and sensitively.

We do our best to resolve all work-related issues fairly and quickly.

It doesn’t matter whether you’re an employee, consultant or contractor, if you think that something isn’t right, we want you to tell us about it. Here’s how you can let us know.

1. Your manager or HR
   For employees, your first port of call should be your line manager or your local HR team. They’ll try to resolve it themselves or else will pass it on to somebody else to look into.

2. Email us
   There is a confidential mailbox for anybody who wants to raise a concern. This is managed by the Audit Committee and is completely confidential. Email details to: whistleblowing@entaingroup.com

3. Independent hotline – expolink
   There may be occasions when raising the matter internally doesn’t feel like the right thing to do, so we have an independent hotline provided by Expolink that you can use:
   - 0800 374199 (UK)
   - +44 1249 661808 (Gibraltar and rest of world)

Q&A

Q: Are there things we shouldn’t use the hotline to report?
A: Yes. The hotline is only for reports of serious misconduct or criminal activity. Our grievance procedure is the best way to raise normal HR work-related issues.

Q: Will you keep my identity confidential if I make a report?
A: You can raise a concern anonymously, but even if you don’t, we will always keep your identity confidential unless we can’t for legal reasons (for example, if we have to give details to the police or a court). It’s usually better to say who you are though, as it makes concerns easier to investigate if we can speak to you in person.

Q: What happens if I was wrong?
A: So long as your suspicions are genuine and the report isn’t malicious, you won’t be treated less favourably for raising a concern, even if it turns out that we didn’t find any evidence of wrongdoing.

Q: What if I think one of our partners or suppliers is involved in wrongdoing?
A: You can use this policy to report suspicions about third parties who provide services to our company, including concerns relating to human trafficking, forced labour or harmful child labour. You can also raise concerns relating to the conduct of our own colleagues or the company itself.
We are committed to helping our customers gamble responsibly.

We want to provide a safe and trusted betting and gaming experience for all our customers. That means we provide customers with the best possible service and the best possible player protection.

But while gambling is a great source of fun and entertainment for millions of people around the world, for some it can cause problems. Our goal is to stop gambling addiction and related harm it can cause.

To help us do this we focus on three things:

**Prevention**
We spot risks as early as we can and intervene to prevent problems before they get out of hand. We have many safer betting and gaming tools in place, which include ways to help customers play within their limits. We also train people working in our shops to identify and help customers who might be having problems.

**Fairness and Integrity**
Our betting and gaming products are founded on the spirit of fair play – because the trust of our customers is fundamental to our success. That means making sure our games are fair and protecting our customers against fraud. We work closely with independent authorities who monitor our products and have dedicated investigation and online monitoring teams to protect our customers.

**Reliability and Security**
Our websites are subject to strict legal requirements and regulations across the world.
Our betting shops are also subject to regular monitoring, and we review and improve our security procedures on a regular basis to help keep our customers and people safe.
We abide by the highest standards of financial and business conduct, and will never tolerate bribery, money-laundering, conflicts of interest, tipping-off, anticompetitive practices or unauthorised share dealing.

As a global FTSE 100 company, we have a responsibility to protect the interests of our shareholders, colleagues and customers. Our financial and business dealings must be legally compliant and carefully managed at all times.

Although we have policies in place that help our people stay on the right side of the law, we also know that process and procedure is only part of the picture. We try to create a culture where people not only understand what they need to do, but also know how to avoid common pitfalls. A lot of this comes down to people’s mindset and being part of a team where we all take pride in doing the right thing.

In this section, we explain more about our standards of financial and business conduct, and what they mean in the real world.
Financial & business conduct continued

Money laundering

Money laundering occurs when the proceeds of crime or terrorism are ‘laundered’ by being spent or invested in legitimate activities. This could be by purchasing properties or goods, or in our case, betting and gaming (by converting money into winnings). Keeping this money out of betting and gaming is an important part of our regulatory obligations.

Money laundering is a serious criminal offence and could result in fines, imprisonment and the potential loss of our betting and gaming licences.

You can be found guilty of money laundering if you know or suspect that somebody is betting and gaming with the proceeds of crime and don’t report it, if you tip somebody off that they’re under investigation, or if you do anything to ‘prejudice an investigation’, which can include falsifying information.

What we’re doing about it

In our retail businesses, we have developed training programmes and shop operating procedures to help our people recognise the ‘tell-tale’ signs of money laundering.

Outside retail, we have separate processes and training to identify potential money laundering and help people to spot money laundering in their day-to-day work. High risk areas of the business are given additional support.

What do I do if I suspect money laundering?

Retail colleagues should follow the anti-money laundering and reporting process in their shop operating procedures. All non-retail colleagues should use our Speak Out policy, speak to the legal team, or contact our money laundering reporting officer directly.

Bribes & improper payments

Our policy at Entain is simple – making, promising or accepting any form of bribe is unacceptable, whether directly or indirectly (for example, via a third party). This applies to our employees as well as anybody working for us, providing services to us, or working on our behalf.

What do we mean by a bribe?

Bribes are usually given to obtain some sort of business or personal advantage. Sometimes, bribes take the form of ‘facilitation payments’, where somebody in an official position demands payment for goods or services that should be free. These tend to be more common outside the UK.

Bribes can come in different forms and don’t have to involve cash changing hands. They can be made by giving gifts or some other sort of non-financial advantage, like holidays, tickets to an event, or meals out. Bribes may also be offered by potential suppliers, who then expect to win a tender or get preferential treatment.

Taking or giving a bribe is a serious offence, which can lead to fines, imprisonment and criminal prosecution. It could also mean the loss of our gambling licences.

- Some forms of bribery are more common outside the UK. You should always refuse to pay facilitation payments (unless your safety is at risk). If you are not sure what to do, or feel like you have to make a certain payment, report the matter to the legal team as soon as you can.

- Be careful when giving or receiving gifts, tickets or other forms of entertainment. Our Gifts and Hospitality policy explains some of the things to watch out for and what you should do.

- If in doubt, it’s better to politely turn down a gift than face the risk of accepting a bribe. If you think that a bribe may have been offered or made, speak to the legal team or use the Speak Out policy to report your concerns.
Gifts & hospitality

It can sometimes be hard to judge whether a gift is a token of appreciation or something more.

Sometimes giving and receiving appropriate hospitality is fine as part of a normal business relationship, but gifts or hospitality in return for a favour or advantage is not allowed and may be considered a bribe. This is particularly true if we are going through a tender process or signing a new deal.

Gifts or hospitality should never affect (or appear to affect) impartial decision-making, which should always be based on factors such as quality, value, experience, skills and service.

What we need you to do

You should never:

- give or accept any excessive gifts or hospitality. If in doubt, ask yourself how it might look to somebody outside the company or if it were reported in the press;
- give or accept any gifts or hospitality during a tender process or commercial negotiation;
- give or accept any cash or a cash equivalent;
- ask for gifts or hospitality; or
- be involved in any business transactions that could result in personal benefit.

Please be particularly careful if the gift involves a public body, government official or an employee of a government-owned company, and seek advice from the legal team if you are unsure. You should never offer gifts or hospitality to a government official.

What to do if you are offered or want to give gifts or hospitality

You must first obtain your line manager’s permission before accepting or giving any gifts or hospitality.

This will then be declared to the group company secretarial team who will record it on our gifts and hospitality register.

Use our Speak Out policy or contact our legal team if you think that somebody could be giving or receiving gifts or hospitality as a bribe.

Competition

We believe in free and fair competition, which is why we don’t enter into formal or informal agreements with our competitors or share confidential information that could be anti-competitive.

Most countries we operate in have laws that stop competitors working together to ‘corner’ a market or disrupt trade.

What we need you to do

- be aware of potential competition law issues in the region you work when dealing with any of our competitors and escalate matters to your line manager or the legal team whenever you have concerns;
- keep information regarding prices, costs, commissions, discounts or rebates confidential and do not discuss them with competitors; and
- make sure you don’t enter into any agreements with competitors to divide regions and markets, coordinate bidding proposals, or fix prices or returns for our products or services.

If you are ever in doubt, contact our legal team.
Insider dealing

Insider dealing is using unpublished price-sensitive information about the company to get an unfair advantage when buying or selling shares in the company.

That could involve, for example, selling shares before company losses are made public, buying shares before strong trading figures are released, or buying shares before a lucrative deal hits the headlines.

Using ‘inside’ information in this way to gain a financial advantage is a criminal offence.

What we need you to do

• Don’t buy, sell or deal in Entain securities, or encourage others to do so, if you have access to inside information (or there is a reasonable chance you might have access to inside information).

• Don’t sell or deal securities of any company if you have inside information.

• Don’t pass inside information to third parties about Entain that may give them an advantage. This is not only a breach of confidentiality, but you may also be committing the offence of insider dealing.

• Contact the legal team or use the Speak Out policy if you think somebody might be insider dealing.

Obtaining clearance to buy/sell shares

Some of our people will have regular access to inside information. They will need to follow the procedure for obtaining ‘clearance to deal’ in the Entain Share Dealing Code. The group company secretary will let you know if you are subject to the code.

Tax evasion

Tax evasion is a criminal offence that involves the illegal underpayment or non-payment of tax by various methods. These methods could include deception, hiding assets, failing to declare income or artificially inflating/deflating costs.

Under the UK’s Criminal Finance Act 2017, Entain is under a legal duty to prevent tax evasion by its “associated persons” both in the UK and wherever Entain does business. An associated person could be anyone we do supplier, agent, contractor or other person we do business with.

What we need you to do

We expect all our colleagues to familiarise themselves with our Anti-Facilitation of Tax Evasion policy and complete mandatory training provided so that you’re equipped to recognise situations that are reportable.

In addition to expecting you to follow the law in respect of your personal tax affairs, we expect all our colleagues not to do anything that might result directly or indirectly in Entain committing tax evasion itself or facilitating criminal tax evasion by an associated person.

If you have any concerns or questions, please raise them through our Speak Out policy as soon as possible, or escalate to your line manager or as per the policy.

Conflicts of interest

A conflict of interest involves a situation where your personal interests and those of Entain are potentially at odds with each other, for example:

• being employed somewhere else while also working for Entain;

• managing a relative, spouse or partner;

• working in the same department as your partner, spouse or close relative without clearance from your line manager and HR;

• using confidential information about somebody to your advantage;

• having a personal or financial interest in a supplier, customer or competitor that influences or could influence your decisions at work; or

• using Entain resources for personal use.

If you have a conflict of interest or potential conflict of interest, you should:

• raise it with your line manager and HR;

• agree how/if it can be managed and get approval if necessary. If it can’t be managed, remove yourself from the business area or situation that is in conflict; and

• report the situation under the Speak Out policy so you and the company are protected.
Integrity is choosing courage over comfort, choosing what is right over what is fast or easy, and choosing to practise our principles rather than simply professing them.

Brené Brown
Looking after our people

Our business relies on people whose energy, commitment, skills and experience make our business the success it is today. We are proud to have a diverse mix of employees from all walks of life who make up the worldwide Entain team.

We show our commitment to our colleagues by doing our best to keep them safe, valued and rewarded for the work they do.

We also make sure that we give our people a voice through regular surveys and our network of employee forums. We rely on their feedback to tell us when something isn’t right, to suggest a better way of working or simply to tell us their ideas, views and opinions.
Equality, diversity & inclusion

We are a global and multicultural business that values, celebrate and respects individual difference, so whatever your sexuality, gender, gender identity, ability, age, race, religion or belief, you will have a voice here and a place to belong.

We don't discriminate on the basis of age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership. We promote equality, diversity and inclusion in all our working practices.

Why diversity matters

All around the world we provide industry leading betting and gaming services to thousands of unique and diverse customers.

And, just like our customers, the people who work for us are diverse as well, and we want to create a culture where everybody is comfortable and celebrated for being themselves. We know that we’re at our best when we are heard and included.

We want to attract people who live up to our values, who are passionate about what they do and who want to do their best. We recruit, promote and reward people from all walks of life on the basis of merit and ability.

Challenge discrimination if you see it, whether with the person concerned or by raising it through our Speak Out policy. What’s important is that you don’t walk by and let it happen.

What discrimination looks like

The most obvious sort of discrimination is where somebody is treated less favourably for a reason that has nothing to do with their ability. The law sets out categories of people where less favourable treatment is always illegal (listed above). An example of this would be where somebody isn’t promoted because of their race, gender or religion, or is harassed or victimised for the same reason.

Sometimes, people can be discriminated against even if they don’t fall into one of these groups, but somebody thinks they do, perhaps assuming they are of a particular sexual orientation or racial background when they actually aren’t. It’s also possible to discriminate against somebody because they are ‘associated’ with somebody in one of these groups, perhaps as their friend, partner, wife or husband.

At Entain, all forms of discrimination are unacceptable. For more information, please check the Inclusion Place on our intranet.
Bullying, harassment & victimisation

We act with tolerance and empathy. There is no place in our company for bullying, harassment, victimisation, violence, threats of violence or abuse of any kind.

Nobody likes working in an environment where they feel uncomfortable, intimidated or threatened, which is why we take all allegations of bullying, harassment and victimisation seriously. Respecting and being considerate to our colleagues, suppliers, partners, customers and visitors should be a given.

Harassment
Harassment is any unwanted physical, verbal or non-verbal conduct (for example, looks or gestures) that somebody finds degrading, intimidating, humiliating or offensive. It can occur between people of the same sex or opposite sex and it can also extend to what happens outside working hours.

It’s important to remember that what one person might think of as a joke or harmless banter could be seen very differently by another.

Bullying
Bullying is behaviour that could be seen as offensive, intimidating, malicious or insulting – often involving a situation between people of different seniorities. Bullying can involve physical, verbal or non-verbal conduct.

Don’t confuse bullying with legitimate criticism of somebody’s performance or behaviour.

Victimisation
Victimisation involves treating somebody less favourably because they’ve complained about bullying, harassment or discrimination.

Full details and examples can be found in our Bullying, Harassment & victimisation policy.

How do I report bullying, harassment or victimisation?
Whether it’s happening to you or someone else, your first option is to talk to the person concerned. They might not realise that what they’re doing is offensive or unlawful.

If you don’t feel comfortable doing that, speak to your line manager or HR. We’ll always try to resolve things informally first, but if we can’t do that, you can raise a formal grievance.

If you have any concerns, related to possible forms of human trafficking, forced labour or harmful child labour, please raise this via our Speak Out policy.

It’s important to remember that what one person might think of as a joke or harmless banter could be perceived very differently by somebody else.”
Alcohol & drugs

Many of us like a drink with friends, but it’s easy for drinking to get out of control or become a problem, particularly when it spills over into a work environment.

Drinking alcohol (unless at a company event), taking non-prescription drugs or being under the influence of either of them at work is a disciplinary offence. We have a legal obligation to protect employees’ health and safety, which is why alcohol and drug misuse is taken so seriously.

We also don’t allow non-prescription drugs or alcohol on our premises, though unopened gifts of alcohol for colleagues isn’t a problem so long as they’re kept sealed.

If we think that somebody is taking drugs, drinking alcohol or keeping it on our premises, we may review CCTV footage and search of personal property if necessary.

Supporting colleagues suffering from addiction

If you think you have an alcohol or drug-related problem, get help as soon as possible. Our occupational health team can advise you.

Colleagues who voluntarily attend (and follow) a programme of treatment and rehabilitation will be dealt with under our sickness absence policy.

If you suspect that a colleague has a drink or drugs problem, you can try to discreetly raise it with them first, and then with HR if you still feel there is a problem. We’ll do our best to keep things confidential unless we have to tell the authorities for legal reasons. Colleagues can speak to our occupational health team in confidence at any time.

Social functions

If you’re going to a work event, please drink moderately and think about how you behave. It’s easy to say and do things you might regret when you’ve had a few drinks.
Health, safety, security & wellbeing

We are committed to providing a safe work environment which promotes our people’s safety, health and wellbeing.

Keeping our people safe and secure

Our HSSE (Health, Safety, Security and Environment) team is responsible for engaging and collaborating with our global teams to develop robust risk profiles, risk assessments, action plans, controls, training and guidance to make sure people can come to work or visit our premises safely and securely. This is supported by our certification to ISO 45001.

But it’s not all about policies and procedures, it’s about the culture we create through what we do, what we say, and how we keep each other safe and secure in our day-to-day work.

We need everyone to role model the behaviours they want to see. That includes:

- taking personal responsibility for our own health, safety, security and wellbeing, as well as that of our colleagues;
- speak up and challenge and report unsafe acts and conditions;
- contributing ideas to continually improve working practices;
- following all relevant policies, procedures, guides and briefs. These are there to assist you but of course, they are not so set in stone that we can’t deviate if it means there is a possibility of harm; and
- stopping what you are doing and asking for help if you are unsure about any HSSE issue.

If you have any HSSE concerns, please raise them with your manager, a member of the HSSE team, or if the issue hasn’t been resolved, use our Speak Out policy.

HSSE & retail

We have a number of policies that apply only to our retail shops. They need a slightly different approach because they’re open to the public. These policies are contained within our arrangements, shop operating procedures, retail managers’ briefs and work instruction notices.

HSSE and stadia

Risks also tend to be different in our stadia from the rest of our business, which is why we have a number of stadia-specific policies. Stadia policies are contained within our arrangements, managers’ briefs and work instruction notices.

HSSE in offices and remote environments

Risks to colleagues who work in our offices or remotely are specific to that environment. We have a number of specific policies and processes that are contained within our arrangements, SOP’s, managers’ briefs and work instruction notices.

Health and wellbeing

As well as keeping people safe, we are also conscious that people’s physical and mental health and wellbeing is just as important.

Our Well-Me programme focuses on three key areas: Think Well (helping us to thrive mentally), Live Well (helping us to thrive physically) and Work Well (creating a work environment that supports both mental and physical health and wellbeing).

Personal issues can be discussed confidentially with line managers and/or HR. Alternatively, we offer trained Mental Health First Aiders as well as a free 24 hour employee assistance programme (EAP) helpline and our Unmind app. More details can be found on our intranet.
Looking after our people continued

Information security

We make every effort to protect personal and confidential information relating to our employees, customers and suppliers.

Entain handles vast amounts of information every day. To make sure that data is kept and processed properly, our procedures for handling it must be legally compliant and our systems and networks secure. Our aim is to ensure that information remains confidential, isn’t misused or distributed unlawfully and is kept accurate and up to date in accordance with our data protection policies.

We ask everybody who has access to our I.T. systems that they only use them for legitimate work-related matters and comply with the terms of our acceptable use policy which you be found on our intranet. If you have any concerns relating to information security please email securityincidents@entaingroup.com.

Practical ways to keep information safe

Understand the information you have. Is it personal or confidential, can it be shared?

1. Clear your desk when you leave work.
2. Think before you click. Don’t open attachments or links you aren’t expecting.
3. Only use authorised software and hardware and make sure you comply with our I.T. procedures.
4. Protect your password and data. Use strong passwords and don’t disclose them.
5. Keep an eye on laptops and don’t leave documents or removable media lying about.
6. Lock your screen when you leave your computer unattended.
7. Don’t disclose information with third parties without prior approval.
8. Make use of company-approved cloud storage sites (such as Microsoft365).
Privacy & data protection

Entain processes personal data of its customers, employees and suppliers and takes its obligations to ensure privacy and protection for this data very seriously. As our employees, we expect you to do the same.

Our commitment is to foster a culture of privacy, transparency, accountability and fairness to the data that we process at Entain.

It is also important that as a multinational business, we demonstrate both our commitment to privacy expectations and compliance with all international data and privacy laws, in particular the General Data Protection Regulation (GDPR).

Definition of Personal Data

The definition under the GDPR defines personal data as:

**Personal data** = any data relating to a living person who can be identified from that data, such as names, contact details, usernames, passwords, photographs, CCTV images, IP addresses, location data, responsible gambling information, financial information, identification documents etc.

**Special category data** = more sensitive than personal data and requires greater controls as it has the potential to harm individuals more if the information is misused. This could include data disclosing an individual’s racial or ethnic origin, religious beliefs, political opinion, trade union membership, health, sexual orientation, genetic profile, biometrics and criminal offences or convictions.

Please be careful, however, as the scope of protection can vary under other laws and regulations. For example, special category data in Israel can include financial and military data. In India, it can include financial, physical, and health data.

No matter what type or what category of personal data you intend to use, please always check with the privacy team if you have any questions. At Entain, our objective is to apply the highest standards of protection.

Consult our intranet for the Group Data Protection policy or visit our Data Protection space for up to date guidance and other updates.

Key Principles and Tips

1. **Involve the data protection team in projects involving the use or transfer of large-scale processing of personal data, including RG and Self-Excluded data.**
2. **Consider where data will be stored or transferred to as part of data migrations or when decommissioning systems, e.g. what is the plan for data not being migrated or is data being transferred outside the EEA?**
3. **Ensure the data protection team are involved in all third-party supplier due diligence and contract reviews.**
4. **Minimise the amount of data being collected and use anonymous data where possible.**
5. **Ensure the data being processed is proportionate to the purpose, e.g. is it necessary to process all customer data?**
6. **Keep personal data up to date and any inaccurate data should be erased or updated.**
7. **Ensure automated decision-making includes some level of human intervention.**
8. **Be transparent and clear with individuals whose information is being processed what data we process, who has access to it and why we process it.**
9. **Ensure the data collected is aligned to the data subject access and data deletion processes.**
10. **Do not process data for further purposes incompatible with the original purposes.**
11. **Any data to be transferred, physically stored, hosted and accessed in line with the intra-group agreement, speak to the data protection team for advice on this.**
12. **The technical compliance team (techcomp@entaigroup.com) can advise on how to keep data secure to prevent unauthorised processing and accidental loss, damage or destruction, using appropriate technical or organisational measures (in line with information security policies).**
13. **Ensure any data used for testing purposes is not personal data and it is removed from any test environments (not available in deletion history, etc.).**
14. **Do not store data longer than necessary, in line with the Group Data Retention policy.**

For any questions, concerns or incidents to report, please contact the data protection team – dataprotection@entaigroup.com.
Social responsibility

A business of our size and scale doesn’t operate in a vacuum. With thousands of employees, millions of customers and offices around the world, we have an impact on the communities we serve and the environment we work in.

Our aim at Entain is to ensure that our social and environmental impact is positive. Through our charitable schemes, our links to local communities, our efforts to help our customers gamble safely and an environmental policy that seeks to reduce emissions and waste, we want to set the standard in our industry and operate responsibly.

We are no longer just measured by our bottom line but also on how we do business. People want to know whether we are doing the right things socially, economically and environmentally.
Community engagement

In addition to specific projects to support local communities and charitable causes, we contribute to the economy in ways that aren’t always obvious – from employment and pension contributions to taxes and levies. In 2020 alone, the Entain paid over £524m in wages, salaries and pension contributions, as well as £962m in taxes and levies in 20 countries across the globe.

The Entain global foundation

Entain originally launched its Global Foundation in September 2019 to coordinate and support the Group’s ESG initiatives, objectives, and donations around the world. In November 2020, under its new identity as the Entain Foundation, we committed to donating £100m over five years to projects including our new Pitching In programme that supports grassroots sports and sports people. The Foundation is initially focusing on the four key areas of: Responsible betting and gaming, sports integrity and betting and gaming regulation research, education, and treatment; Grass roots, women’s and disability sport; Diversity in technology; and Projects with a clear link to the local community in Entain’s major office locations. The Foundation has also taken on responsibility for administering the Group’s existing CSR projects, including its £2m community fund as well as with SportsAid, EPIC Risk Management, Gordon Moody, the US National Council on Problem Gambling and the Division on Addiction of Cambridge Health Alliance, a Harvard Medical School teaching hospital.

Pitching In grassroots sport investment fund

Pitching In has launched at a time when football clubs and sporting organisations are facing the unprecedented impact on their finances of the Covid-19 pandemic. Launched in September 2020, the multi-million-pound, multi-year, investment programme kicked off with a flagship partnership with The Isthmian, Northern Premier and Southern Leagues – collectively known as The Trident Leagues – which make up levels seven and eight of the English football league pyramid.

SportsAid

Through our multi-year strategic partnership with SportsAid, the charity which supports aspiring athletes, and part of our Pitching In investment programme, Entain provides British athletes with financial support, recognition and personal development opportunities. Each athlete receives an annual award which contributes towards costs such as travel, accommodation, and equipment. Through the partnership, Entain is helping 50 up-and coming sports stars across the country each year.

It can sometimes be easy to lose sight of the positive impact our business can have, but taken together, our contribution to the economy in terms of the employment opportunities we provide and the taxes we pay, as well as the millions of pounds we donate annually to charities and community projects, demonstrates our commitment to help our customers and the communities we serve.
Modern slavery

Even today, slavery and human trafficking happens. Slavery can take many forms including forced labour in conditions of poverty or sweat shops. The UK’s Modern Slavery Act requires us to take steps to prevent any instances of slavery in our business, specifically our supply chain.

We are committed to preventing slavery and human trafficking in all forms and we expect the same commitment from our employees, contractors, suppliers and other business partners. We are in regular communication with our suppliers and partners to ensure this commitment is upheld. We also regularly train our colleagues on the importance of our commitment and how to be able to identify any concerns they may have. You can read more in our Modern Slavery policy.

If anybody suspects that slavery or human trafficking is taking place in any of our operations, or in connection with any of our partners, this should be reported as soon as possible through our Speak Out policy.
The environment

We work hard to reduce our environmental impact as a business and make it as easy as we can for our colleagues to do the same.

Keeping our people safe and secure
Entain is already recognised for its commitment to environmental and social measures through membership of the Dow Jones Sustainability Index (DJSI). Certification to ISO14001 for environmental management is also a key measure for us to manage our risks and keep us on track for our Net-Zero by 2035 commitment.

Our environmental strategy is based on identifying our environmental impact as a business. This broadly falls into four categories: greenhouse gas emissions, waste, pollution and sustainability. We then assess the risks our business activities pose in those areas and take steps to reduce them. This could involve changes to our working environment, delivering training, communication or engagement programmes, introducing new policies or simply helping our people to set a good example and take responsibility for the environment.

Greenhouse gases and climate change
We’re cutting harmful emissions by reducing business travel and promoting car shares. We introduced a target to reduce emissions by 15% between 2018 and 2021.

Waste reduction
Wherever possible, we try to reduce our environmental footprint through re-use and recycling programmes. We’ve set targets and objectives for improving our recycling rates and try to ensure that our suppliers and contractors have proactive environmental policies in place as part of our procurement process.

Pollution
Our business activities have a comparatively low risk of causing environmental pollution, but we work hard to reduce any potential sources of pollution.

Sustainability
Working sustainably reaches into most aspects of our work, including decisions around how and why we travel, what we purchase and what we do with our waste. Not only can we all help to reduce our environmental impact and reduce costs, we have the personal satisfaction of knowing it’s the right thing to do.

What can colleagues do to help?
There are many ways our people can reduce their personal, and our company environmental impact while at work, for example by:

- reducing waste wherever possible – avoiding single-use plastics and using refillable mugs, cups and bottles;
- recycling as much waste as we can;
- to save energy, turning off unused, non-essential electrical equipment when we’ve finished, such as lights, air conditioning, computers and screens;
- avoiding unnecessary travel and using conference call facilities or video conferencing when we are able;
- encouraging walking, cycling or using public transport where possible;
- encouraging car-sharing with a colleague if someone needs to drive; and
- not printing documents unnecessarily and using document collaboration tools or soft-copies instead.

We always welcome new ideas, so if you have any suggestions for how people can do more to protect the environment, or if there are other things we can do on a corporate level, please get in touch with our director of HSSE.