



For the good of entertainment

# Modern Slavery and Human Trafficking Transparency Statement 2021



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The following statement is written in accordance with the requirements under Section 54(1) of the UK Modern Slavery Act 2015 and is applicable to Entain plc and its subsidiaries<sup>1</sup> (hereafter “Entain” or “the Group”).

The statement sets out the Group’s activities and measures taken between 1st January and 31st December 2020 to prevent modern slavery and human trafficking occurring within our own operations and extended supply chain.

<sup>1</sup> Relevant subsidiaries in scope of the UK Modern Slavery Act’s disclosure requirement and making this statement for the financial year 2020 are: Ladbrokes Betting & Gaming Limited, LC International Limited, ElectroWorks Limited, Headlong 2 Limited, Sporting Odds Limited, Entain Marketing (UK) Limited, Entain Holdings (Gibraltar) Limited, Mars LLC, Entain Corporate Services Limited, Entain Operations Limited, ElectroWorks (Malta) PLC, Martingale Malta 2 Limited, bwin (Deutschland) Limited and Derby N.V. A full list of subsidiaries within the Group can be found on pages 176-183 of the 2020 Annual Report.

# Modern Slavery and Human Trafficking Transparency Statement 2021

## Business overview

Entain plc (LSE: ENT) is one of the world’s largest sports-betting and gaming groups, operating both online and in the retail sector. With licenses in more than 20 countries, the Group employs a workforce of more than 24,000, in 20 offices across five continents.

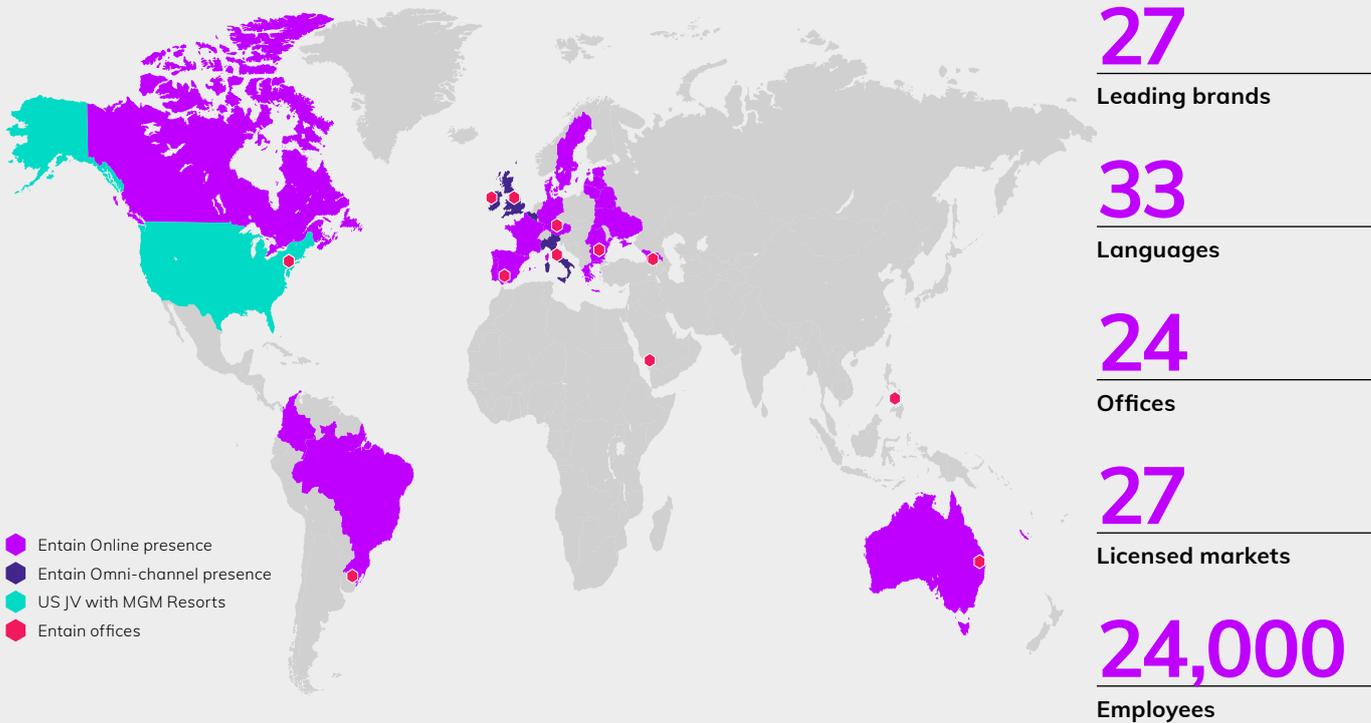
In December 2020 we rebranded to Entain (from GVC Holdings), to reflect our ambition to be the world-leader in sports betting and gaming entertainment.

The Group owns a comprehensive portfolio of established brands; Sports Brands include bwin, Coral, Crystalbet, Eurobet, Ladbrokes, Neds and Sportingbet; Games Brands include CasinoClub, Foxy Bingo, Gala, Gioco Digitale, partypoker and

PartyCasino. The Group owns proprietary technology across all of its core product verticals and in addition to its B2C operations provides services to third-party customers on a B2B basis. In the US the Group operates BetMGM, a joint-venture with MGM Resorts.

Through a combination of organic growth and merge and acquisition activity (M&A), the Group has expanded rapidly in recent years to become one of the world’s largest listed sports betting and gaming companies. In 2018 Entain completed the acquisition of Ladbrokes Coral Group PLC, the Group’s first move into retail operations. This came two years after the acquisition of the international online operator, bwin.party digital entertainment plc, in 2016.

**A technology-enabled entertainment business and one of the world’s largest sports-betting and gaming groups, with leading global brands and a strong position in the US.**



2004:	2009:	2012/13:	2016:	2018/19:	2020:	2021:
IPO of CasinoClub (£131m)	Acquisition of Betboo (\$30m)	Acquisition of Sportingbet (£485m)	Acquisition of bwin.party (£1.1bn)	Acquisition of Ladbrokes Coral (£3.2bn) and establishment of BetMGM, 50/50 JV with MGM	Rebrand to Entain	Acquisition of Enlabs and Bet.pt, increasing number of regulated international markets by 30%

## The Entain story

### Vision

The world leader in sports betting and gaming entertainment

### Purpose

Revolutionise gambling to create the most exciting and trusted entertainment for every customer

### Strategy

#### Technology Enabled

##### Sustainability

- Focus on regulated markets
- Lead on responsibility
- Best in class corporate governance
- Best place to work

##### Growth

- Leadership in the US
- Grow core markets
- Enter new markets
- Expand to new audiences

### Deliver sustainable value for

Customers

Our people

Communities

Shareholders

Entain is a member of FTSE4Good and the DJSI, ESG indices which identify companies that meet globally recognised corporate responsibility standards.

Regulation	Responsibility	Corporate Governance	People & Communities
Only operate in regulated markets	Scientific approach to safer betting and gaming	Best in class corporate governance	Best place to work
100% regulated markets by end of 2023	Leverage technology for player safety	Strengthened Board	Reduce environmental impact
Pro-active regulator engagement	New responsibility algorithms	Strengthened Processes	£100m to Entain Foundation over five years
	Remuneration tied to responsibility		

Long-term sustainability = Long-term success



## Introduction

We aim to meet the highest standards in everything we do, from the way we run our business and manage our financial affairs, to how we support our people, customers and communities. We take our legal responsibilities incredibly seriously and additionally recognise that our commitment in light of Modern Slavery and Human Trafficking goes way beyond duty.

It is our intention as an organisation to act morally, honestly, openly and with integrity in everything we do and we firmly believe that a robust approach to Modern Slavery is one such way that we can evidence our commitment to acting as a positive contributor to the communities in which we work and to society at large.

Intrinsic within our Strategy is being an employer of choice, one who values colleagues across the globe and who creates the best place to work.

Our Code of Conduct (which can be viewed [here](#)) sets out 10 guiding principles clearly stating our expectations of our Colleagues, Suppliers and Partners. Failure to adhere to our Code of Conduct may result in colleagues being disciplined which could lead to dismissal. Supplier or partner contracts may be terminated in the event of a breach however we will always try to resolve issues collaboratively in the first instance. We recognise that suppliers who have been affected will often have been inadvertently, so we make every effort to ensure a safe environment to speak up against any concerns.

All colleagues are required to undertake mandatory training on our Code of Conduct which must be renewed annually and furthermore Managers and HR colleagues receive training on policies, practices and procedures.

## The Code of Conduct states

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 (our grievance policy can be found by colleagues on our intranet)
3. We are committed to helping our customers gamble responsibly
4. We abide by the highest standards of financial 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 (our Equality and Diversity policy can be found by colleagues on our intranet)
6. We promote equality, diversity and inclusion in all our working practices (our Equality and Diversity policy can be found by colleagues on our intranet)
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 (our bullying and harassment policy can be found by colleagues on our intranet)
8. We are committed to providing a safe working environment that promotes our people's safety, health and wellbeing
9. We make every effort to protect personal information relating to our employees, customers and suppliers (our privacy notice can be found by colleagues on our intranet)
10. 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 (our public statement around our environmental impact can be viewed [here](#))

Our Code of Conduct sets out specific expectations, policies and remediation against all the items above. Our Chief Governance Officer, Executive, Board and CEO fully endorse these as our guiding principles.

Our Whistleblowing channels ensure that colleagues can confidentially report any concerns that they have. We have reviewed the spread of locations and type of issue raised, which gives us high confidence that our Whistleblowing services are accessible and well communicated.

Our Whistleblowing policy can be viewed by colleagues on our intranet. Colleagues can choose to report internally to a service managed in confidence by the Internal Audit function on behalf of the Audit Committee or to an independent hotline service.

Any case raised is thoroughly investigating making use of external, expert and independent services where appropriate or where internal limitations or bias may exist. We recognise the specific nature of any cases of Modern Slavery reported through the Whistleblowing service and the need to ensure those responsible for investigating whistleblowing reports are appropriately skilled so will be conducting additional training on the issue of Modern Slavery and Human Trafficking in 2021.

Ultimately, we acknowledge that our success and reputation depend on how we conduct ourselves as individual colleagues and as a business. We know that we can only deliver short and long-term returns for our shareholders if our business is founded on principles of integrity and fair play.

## **In addition to the 10 items detailed in our Code of Conduct, Entain also recognises and adheres to the Ethical Trade Initiative's Base Code;**

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

## Our Approach to Modern Slavery

We recognise the two main areas of risk in our business as being the recruitment and onboarding of staff and within our supply chain. This year we have partnered with Unseen, a leading sector charity who were founded in 2008 with the aim to eradicate the issue of Modern Slavery and Human Trafficking. This partnership is providing us with advice, training and education with a view to ensuring that we are doing all we can to play our part in tackling this atrocity and evidences our commitment in this area.

### Working with Unseen, our key areas of focus in 2021 are;

- Embedding Modern Slavery and Human Trafficking awareness and risk management within existing corporate governance
- Establishing a cross-functional Steering Group to focus activities
- Introducing mandatory training for all colleagues to highlight and educate on the issue
- Supply chain and supplier governance enhancements

We recognise that people becoming enslaved is a key issue across the globe and within some of the countries in which we operate. We have used our Partnership with Unseen along with resources from the Ethical Trade Initiative to educate ourselves and to prioritise higher risk areas and to inform improvement plans. In addition, we have a keen internal focus in key departments with activity directed from the Modern Slavery Steering Group,

As a FTSE 100 company we wish to use our position to influence positive change and will continue to explore through our partnership with Unseen what additional activities within the sector and beyond we can undertake to further raise the issues of Modern Slavery and Human Trafficking in prominence and to share best practice and risk assessment knowledge.

Our workforce is more than 98% directly employed giving visibility of recruitment and onboarding processes of the significant majority of our people. Our risk management approach within our supply chain has been updated this year and continues to evolve. This gives confidence that we have low risk within the business but we acknowledge that it is difficult to entirely remove any chance of Modern Slavery.

We use tools such as the Walk-Free Foundation's Country Check to pay particular attention to countries which are known to have a greater prevalence of Modern Slavery and/or Human Trafficking. In addition, we have asked our Modern Slavery Partner Unseen, to undertake a full and comprehensive gap analysis of our current and future supply chain assessment. This gap analysis will provide further areas requiring attention which will in turn, inform our continuous improvement efforts.

### Modern Slavery and Human Trafficking awareness and risk management governance

This year we have worked to embed Modern Slavery and Human Trafficking risk management and awareness within our corporate governance.

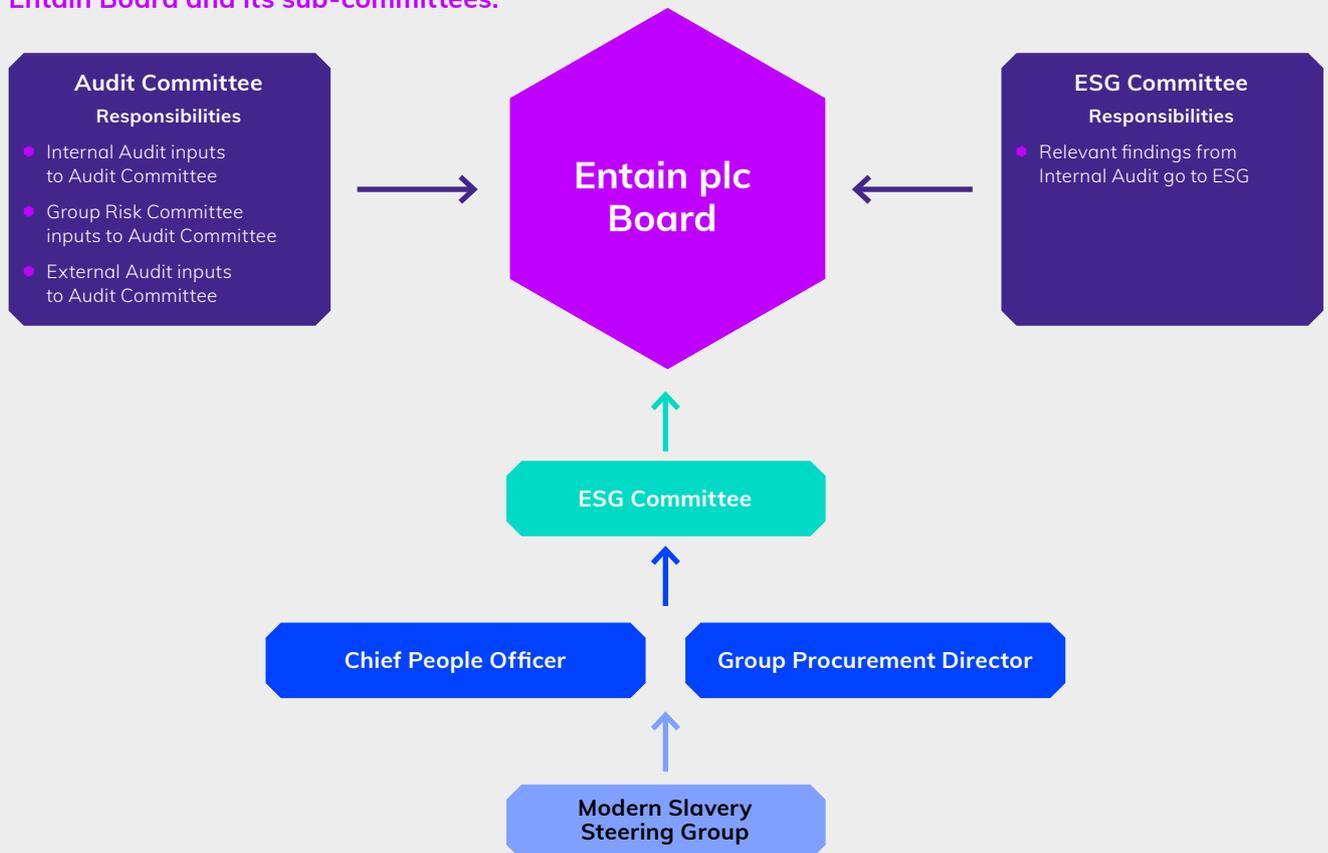
Modern Slavery has been added to Corporate Risk Register meaning in practical terms that this is now visible across the business and forms part of a mature corporate governance review on a quarterly basis. In adding it to the risk register, we have taken the opportunity to talk to the Group Risk Committee about the issue. The Group Risk Committee is formed of several of the most Senior Managers in the business and is chaired by the Chief Governance Officer and attended by the Chief Financial Officer & Deputy CEO. The Group Risk Committee is answerable to the Board level Audit Committee.

In addition, Entain's Audit Committee includes Modern Slavery within its oversight of key risks, and has commissioned an internal audit of the effectiveness of the Group's processes and controls to take place in 2021. The output of this report will include an assessment of the risks and controls and any required improvements will be documented in a report to the Board and Audit Committee, and shared with our external auditors, KPMG. Modern Slavery will henceforth also form an ongoing part of the audit cycle of the Group to ensure that the controls continue to work effectively and are assessed for opportunities to improve regularly.

Throughout 2021 we will continue to educate our People on the issues of Modern Slavery and Human Trafficking and utilise our internal Governance to ensure we are continuing to update our risk assessment and driving improvements in our approach.

### Our current governance structure

#### Entain Board and its sub-committees:



### Modern Slavery Steering Group

In 2021 a Steering Group of Managers and Leaders from across the business was founded to focus efforts and activities in this area. The Group includes representatives from Group Procurement, Internal Audit, Human Resources and Company Secretariat. Attendance will be reviewed annually.

The Group's aims have been to discuss, recommend and implement efforts that will ensure the continued focus and awareness of the issues surrounding Modern Slavery.

One of the Group's first activities was to establish a Partnership with a sector expert.

**Unseen were selected and are working with the Steering Group on a number of activities including;**

- Gap analysing current approach
- Reviewing and recommending improvements in this statement
- Awareness raising sessions
- E-learning design for all colleagues, and
- Training for specific colleague groups

### Training

In 2021, the existing Modern Slavery training (currently part of mandatory Code of Conduct training) will be split into its own dedicated package of learning. This module will be mandatory for all colleagues and will be required to be refreshed annually.

The training will educate and inform our People on the issue of Modern Slavery and ensure that in the event that they should have any concerns, that they know how to highlight these through the company's internal processes, through the independent Whistleblowing or through our Partner, Unseen's reporting service.

In addition to the all colleague e-learning, in-person training for specific groups will also be undertaken. This training will be tailored for colleagues working in Procurement, Internal Audit, Human Resources and Recruitment and Property. This training will go into even further detail on the important and prevalence of the issues and how to spot the signs of Modern Slavery.

Lastly, we will be continuing awareness raising sessions in several forums throughout 2021. To date, the Group Risk Committee and the People and Culture Leadership team have had sessions relating to Modern Slavery and planned sessions include various Employee Forums and the Group Senior Leadership Team meet up.

### Recruitment and onboarding of staff and contractors

Our Aim is to attract a diverse workforce of people who are passionate about what they do, reflect our values, and simply want to do their best. We recruit, promote and reward people on merit, and do our best to promote equality, diversity and inclusion in all our working practices.

More than 98% of our staff are directly employed. We do not use nor permit recruitment fees and have a number of policies in place which set expectations of behaviour and give clear paths of escalation and whistleblowing (for employees, contractors and suppliers).

**We always operate in a legal and ethical manner with our recruitment practices and ensure;**

- Legal right to work within the given country is checked
- Suitable references are received
- Suitable identity documentation is available to the candidate (i.e. they have access to their passport or other similar legal document in their name)
- Identity confirmation checks will also be carried out for some roles

Our full Recruitment Policy can be found by colleagues on our intranet.

## Responsible recruitment

We recognise and comply with a number of the indices given within the [Responsible Recruitment Toolkit](#) including;

- We have a business structure, business model and governance compatible with operating legally, ethically and sustainably
- Ethical standards of recruitment and labour supply are embedded through effective management systems, and
- A worker-centred approach is taken to ensure high levels of worker job satisfaction and engagement – candidates applying for jobs with the Group are regularly asked for feedback on the process which in turn informs continuous improvement efforts

In 2021 we are continuing to improve the candidate experience which will include a review of Right to Work checks to seek opportunities to make this even more robust and independent. We will report in next year's statement on the findings and any enhancements as a result of this review.

## Recruitment fees

We do not use nor do we allow the use of recruitment fees at any stage of our process. We comply with all the findings of the [Institute of Human Rights' 2018 report](#) on the subject and adhere to the 'Employer Pays Principle' – we wholeheartedly agree that no worker should bear the cost of the recruitment process.

We understand that the use of recruitment fees is an area of growing concern and will continue to gather insight from our partnership with Unseen on how we can continue to monitor against the rising risk in this regard.

## Contract and Freelance labour (Contractors)

Entain uses directly employed colleagues wherever possible. As stated above, less than 2% of our current workforce are not employees. Where it is necessary for us to use contract or freelance labour, all agencies we do business with are subject to the supplier checks detailed below (where our agreement is not directly with the individual providing the contract or freelance labour).

In the UK we use a managed service provider, Guidant Global, to ensure consistent processing of our contractors. Through 2021 we will be assessing the process for Contractors across the Group and taking the necessary steps to ensure that we are ensuring fair and ethical treatment for all. We recognise the Responsible Recruitment Toolkit and comply in a number of areas. Globally all contractors are;

- Employed/engaged in a formal and lawfully recognised relationship appropriate to their working arrangements and they are offered regular work
- All workers are paid for all their working time, on time, and in accordance with national law and their contract/assignment details, and
- All workers are welcome to take up opportunities directly with Entain should they wish to.

## Equality and Diversity in recruitment

Our Equality, Diversity and Inclusion policy sets out our commitment not to discriminate on the basis of a person's age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership.

To make sure we meet this commitment, we ask candidates to voluntarily complete a (confidential) recruitment monitoring questionnaire when they apply for a vacancy. The information provided is separated from the application on receipt, so those involved in selection do not have access to it.

## Recruitment training

In 2021, Recruitment teams across the Group will be given specific and tailored training by our Modern Slavery Partners, Unseen. The aim of this training is to ensure that colleagues understand how to spot and escalate any signs of Modern Slavery or Human Trafficking throughout the recruitment process.

The Recruitment Team are developing training to Hiring Managers to be launched in 2021. As part of this training, Managers will be required to complete an assessment including a confirmation of their awareness of Entain's Modern Slavery approach. If Managers are not aware of the issue, our policy and approach, they will be signposted to the relevant resources before they are granted their "licence to hire" on behalf of the Group.

### New Starters

Once recruited, all new starters are introduced to the following internal policies by way of mandatory learning. All policies are available to colleagues on our intranet.

- [Code of Conduct](#)
- Equality & Diversity
- Bullying, Harassment & Victimisation
- Speak Out (Whistleblowing)
- Grievance

### Supply chain

Communicating clearly and effectively for who we are and how we conduct business is of paramount importance to us. In 2020 we published our [Supplier Policy](#) providing the standard, principles and policies that lay out what we expect from everyone who does business with us, irrespective of supplier size, geography or good(s) and/or service(s) offering.

Following the GVC acquisition of the Ladbrokes Coral Group in 2018, the more recent acquisition of Enlabs (Scandinavia) and Bet.pt (Portugal) and the new Group's (Entain) identity, we continue to align and improve our common set of principles and procedures through organic and inorganic growth in relation to procurement engagement. Procurement's guidelines and fair, ethical treatment of suppliers whilst mitigating risk is core to our philosophy during any engagement. We are being supported by a significant transformational ERP (Enterprise Resource Planning) single IT system that will create a unified, digitally-savvy core business system across the Group.

All suppliers must adhere to and ideally exceed the requirements set out in our [Supplier Policy](#) by promoting best practice and continuous improvement throughout their business operations, and as set out in the 'Monitoring and Assessment' section, we have future initiatives planned which acknowledge that our expectations, however clear to suppliers, cannot always be evidenced and we will continue to work on our internal processes to introduce for example, supplier inspections and second tier supplier audits.

- **Child Labour** – We do not use child labour and expect our suppliers to do the same. We expect our suppliers to abide by national laws and, as a minimum standard, not employ children under the age of 15 or as applicable under national laws, whichever is higher

- **Forced Labour** – We commit to not using any forced labour and expect all our suppliers to not use any type of forced labour including bonded, slave or human trafficked labour, and never engage in any form of bought commercial sex acts. Our suppliers must ensure that they are not directly or indirectly involved in any form of forced or involuntary labour. All workers must have the freedom to terminate their employment contract in accordance with established national laws
- **Wages and Benefits** – We expect all our suppliers to pay workers at least the national minimum wage in line local/national laws
- **Working Hours** – Suppliers must ensure that workers comply with local laws. In any event, workers should not be asked to work over excessive hours
- **Confidentiality** – Suppliers must comply with contractual provisions and any legal requirements in relation to confidential information. In addition to any contractual obligations and/or legal obligations, our confidential information should always be handled with care to preserve the confidentiality of such information
- **Freedom of Movement** – Suppliers must not unreasonably restrict workers' freedom of movement by physically confining workers to the workplace
- **Freedom of Association** – We recognise the importance of communication between management and workers with regards to working conditions without fear of intimidation, harassment or penalty and expect our suppliers to do the same. Suppliers must respect the rights of workers to exercise free association including joining an association of their choosing
- **Bribery** – Bribery is a serious offence, which can lead to unlimited fines, imprisonment and criminal prosecution. It could also mean the loss of our operating licences and significant reputational damage. Accordingly, our policy at Entain is very simple – making, promising or accepting any form of bribe is unacceptable, whether directly or indirectly. This applies not only to our employees, but to anybody working for us, providing services to us or working on our behalf across Entain's global operations. Suppliers must comply with all applicable anti-bribery and corruption laws.

If no such anti-bribery or corruption laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010. Where such laws do not exist or are to a lesser standard than the Bribery Act 2010 (England and Wales), the supplier shall comply with the said act as a minimum standard

- **Anti-Money Laundering** – Our suppliers must comply with all applicable anti-money laundering regulations

**Supply Chain Transparency**

We operate under a ‘No Purchase Order (PO), No Pay’ policy that is housed internally on our intranet platform as well as being communicated internally to the Group. This ensures all suppliers are vetted (as set-out below in the ‘Monitoring and Assessment’ section) which not only provides strong governance on the approval of good(s) and/or service(s), but ensures that they are procured with the right due-diligence in-place and further that we have data-rich information over a number of key areas including;

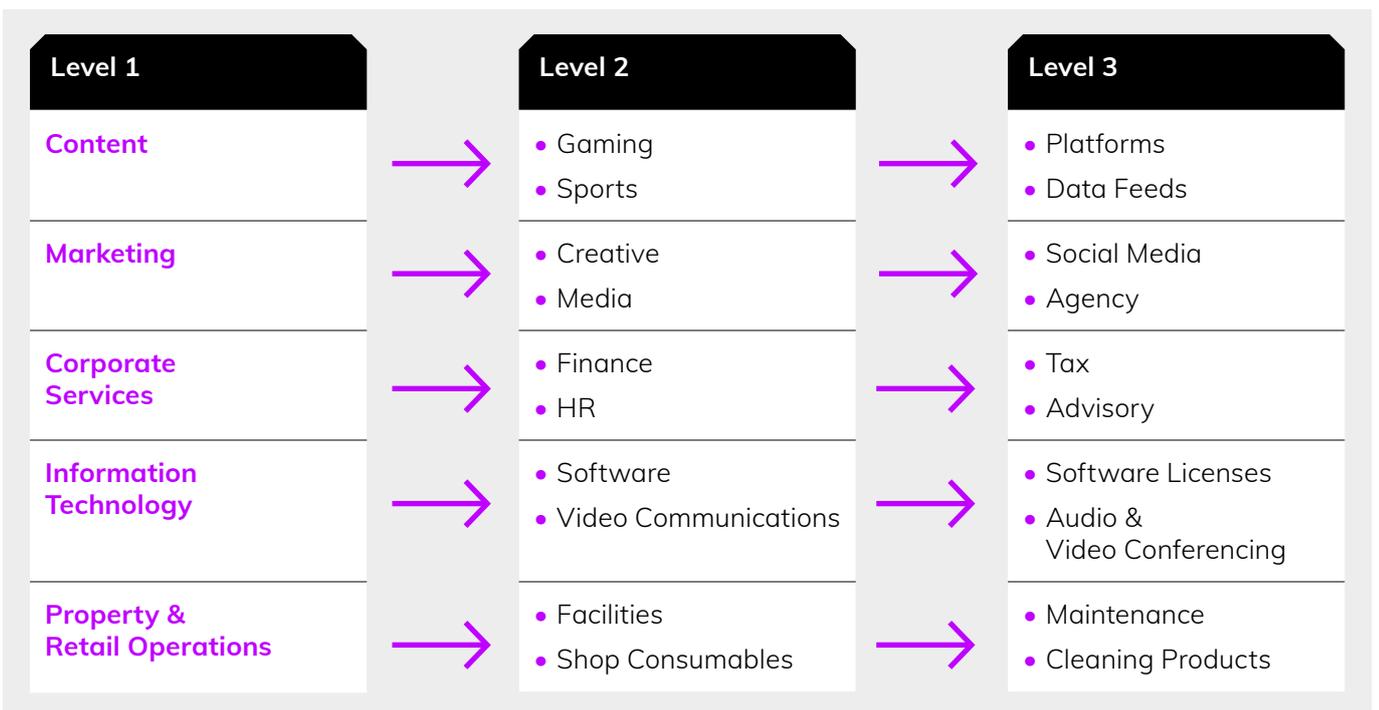
- Supplier name
- Supplier location
- Spend amount committed, and
- Lowest level of taxonomy selected, with an added transaction description

With the above points factored in and integrated into our spend insight platform, the procurement team have fully transparent insight into what the business is procuring, where contracts can be established (if not already) with referenced service-level agreements (SLA’s) and monitoring clauses, which help to mitigate risks from higher-risk countries (as per the Walk-Free Foundation Global Slavery Index) by ensuring additional focus on high-risk locations.

The data provided is fed through to the procurement team who are split into five spend areas at level 1 of our spend hierarchy. We have three levels for our spend hierarchy, detailed below.

NB – this provides a high-level summary example of our spend hierarchy, it is not exhaustive.

In addition to our [Supplier Policy](#), our internal policies, processes and governance principles help us identify and mitigate risk – whether this be data privacy, adverse media or ESG risk, of which sustainability and Modern Slavery risks is central. We perform due diligence on all new suppliers as part of our onboarding process, regardless of size, geography or type of good(s) and/or service(s)



## Modern Slavery and Human Trafficking Transparency Statement 2021 continued

These include financial status via Dun & Bradstreet, company background and registration via Companies House, approval of our Modern Slavery Statement for suppliers located in the top-100 most at-risk countries as defined by the Walk-Free Foundation Global Slavery Index and tax compliance via VIES (VAT Information Exchange System). As part of our continuous improvement, in Q2 2021 all suppliers will be required to approve our Modern Slavery Statement in their onboarding journey into the Group.

In the Procurement team's Request for Proposal (RFP) processes we use the Walk-Free Foundation Global Slavery Index to identify suppliers located in countries at higher risk of modern slavery and/or request details if they themselves procure the required good(s) and/or service(s) from high-risk countries for modern slavery to mitigate risk before we enter into a commercial and contractual relationship. This ensures we have agreed-upon terms and conditions and SLA's that set out how we wish to trade. This includes price transparency, delivery timelines, data protection & security compliance, ethical standards, and behaviours in accordance with all relevant national and international laws and regulations.

Upon notification of contractual end-date, in FY21 Q2 we are developing a process to ensure both the due-diligence checks are re-performed on the relevant supplier as well ensuring the supplier is meeting the agreed upon commercial KPIs.

Additionally, each time we issue a purchase order that acts as a binding agreement between the Group and supplier for the good(s) and/or service(s) offering, we attach our standard terms and conditions that refer to our [Supplier Policy](#).

### The Procurement Lifecycle

Our procurement function is continually developing our policies, processes and governance as well as our tools and systems. We use externally recognised resources, such as the Walk-Free Foundation Global Slavery Index and risk experts Dun and Bradstreet, to ensure risks are mitigated against. We always promote strong corporate social responsibility.

- We ensure we clearly capture the requirements and objectives of the Group
- We competitively tender such requirements and objectives
- We evaluate, clarify and negotiate
- We contract manage
- We exit and service transfer when such relationships come to an end

Through the RFP tender we share our Group internal policies (referenced below, but not limited to) with the suppliers to ensure alignment and business affairs are conducted in a fair, ethical and transparent manner. Suppliers must agree to these. These are also referenced within our contract templates, and the [Supplier Policy](#) within our purchase order terms & conditions.

- [Supplier Policy](#) (publicly available on our website)
- Environmental Policy
- Gifts, Hospitality & Conflicts of Interest Policy
- [Code of Conduct](#) (publicly available on our website)

In 2021 we will improve our scorecard criteria to evaluate supplier selection that will ensure ESG standards are captured and transparently recorded within the procurement function as well presented to the Group in the decision phase of the RFP.

This will result in both sustainability and modern slavery playing a more critical role in our decision-making to identify, mitigate and remediate against potential risk as well as providing a more balanced approach to supplier selection.

By FY21 Q3, we will have inserted a section within our purchase order terms & conditions that specifically requires all suppliers to agree to our Group Modern Slavery Statement, with a link to our publicly available Modern Slavery Statement on our Group website.

Within our existing processes we have review mechanisms to highlight and manage risk in relation to the delivery of good(s) and/or service(s) and capturing data protection, security and technical compliance and our CSR standards.

We work collaboratively with all local, national and international suppliers, and as stated within our purchase order terms and conditions, we maintain the right to conduct supplier audits, both announced and unannounced. If a situation arises whereby there has been a breach of Group policies, in the first instance we will work with the supplier(s) in partnership to rectify the breach. If the supplier(s) refuse to comply or don't work with us, we reserve the right to terminate the contractual relationship immediately. We will also notify the relevant authorities as appropriate. We also have the option of alerting Unseen and utilising their deep sector knowledge to ensure the correct rectification and escalation of any issues.

In the second half of 2021 we will be rolling out our Supplier Relationship Management (SRM) workstream to the procurement function that will strengthen and reinforce our relationships with key strategic & critical suppliers to the Group. Nevertheless, in parallel and in addition to this workstream, regular communication and interactions with our suppliers is of paramount importance to us and key to ensuring where applicable we see, and evidence, the working environment and practices that our suppliers trade within.

The Covid-19 pandemic has severely limited physical reviews and audits, but we have pivoted and put in place key supplier reviews using video conference technology, thus ensuring that commercial and contractual obligations are met in accordance with our fair and ethical standards as outlined in our [Supplier Policy](#) and [CSR reports](#).

### Monitoring and Assessment

Our [Supplier Policy](#), [Code of Conduct](#) and [Modern Slavery Statement](#) are all publicly available on our corporate website, and clearly set-out our expectations for all; employees, contractors, consultants as well as suppliers to act in a proactive, legal and ethical manner at all times.

We use external resources to ensure risks are mitigated against and promote strong corporate social responsibility. In addition to this we are driven by tangible data that provide specific, measurable, achievable, realistic and timely criteria.

In early FY21 Q1 we used the Walk-Free Foundation Global Slavery Index for suppliers that are located in the top-100 most at-risk countries to approve our Modern Slavery Statement. Following on from this we have a number of specific initiatives we are actively working on through FY21 that include the following;

- GAP analysis of our current policies and processes identifying that we have onboarded 303 suppliers of which 24, were located in the top 100 high risk countries
- In FY21 Q2, all suppliers will approve our Modern Slavery Statement
- In FY21 Q2, our procurement team will be fully trained up on modern slavery and human trafficking and what to look out for, how to

mitigate against risks and how to build the right contractual and commercial agreements<sup>1</sup>

- In FY21 H2, all Group employees will be required to complete a mandatory e-learning training module on modern slavery and human trafficking, including the procurement team
- In FY21 H2, we will launch our supplier e-onboarding tool for suppliers to approve our Modern Slavery Statement electronically
- In FY21 H2 and FY22, we will be working on what audits look like from a procurement, risk and modern slavery risk perspective given our supply chain is large and widely distributed across the world, and we are working with third-party consultants on this, such as the charity Unseen. This will be continually developed over the coming years through FY21 and beyond – and would include compliance questionnaires and/or physical site visits, on what cadence these will be performed and thresholds (risk vs spend)
  - Post audit risk-assessments, we will build out metrics and KPIs that will be both communicated to the procurement team as well as the business, and where applicable, externally

This statement has been approved by the Board of Entain plc and of each of its relevant subsidiaries in compliance with the UK Modern Slavery Act on 16 June 2021.



**JM Barry Gibson**  
Chairman



**Jette Nygaard-Andersen**  
Chief Executive Officer

Entain plc

<sup>1</sup> As at 30 April 2021.

**Σntain**

For the good of entertainment