It’s your game
We are Entain.
A world leader in sports betting, gaming and interactive entertainment with a clear strategy to deliver sustainability and growth. Our purpose is to bring moments of excitement into our customers’ lives.

It’s our game, it’s their game...
About Entain

Our vision and purpose
At Entain, everything we do is aimed at delivering the very best in betting, gaming and interactive entertainment. We are one of the world’s largest sports betting, gaming and interactive entertainment groups, operating in the online and retail sectors. As the worlds of betting, gaming media and technology converge, we are uniquely placed to give our customers what they want.

Our purpose is clear – to bring moments of excitement into our customers’ lives. A technology company to our core, we are uniquely positioned amongst our peers to innovate for our millions of customers, enabling us to grow in regulated markets both old and new, while ensuring the highest levels of player protection.

…it’s your game.
## Our Vision

**The World leader in betting, gaming and interactive entertainment**

### 2021 priorities | 2021 progress

#### Growth

<table>
<thead>
<tr>
<th>1 – Leadership in North America</th>
<th>Now the second biggest US operator, BetMGM achieved a 23% market share in the markets which it operates in, in the fourth quarter, in line with our long-term objective of 20% to 25.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clear ambition to be the leading operator in the North American sports betting and iGaming market through BetMGM.</td>
<td>We have now delivered nine years of double-digit growth in online NGR with a two-year compound annual growth rate of 20%cc.</td>
</tr>
<tr>
<td>2 – Grow our core markets</td>
<td>Completed acquisitions of Enlabs in the Baltics, Bet.pt in Portugal, Impala to drive access across Africa and Unikrn to take us into the esports wagering market.</td>
</tr>
<tr>
<td>Continue to grow rapidly in the 31 territories in which we already operate.</td>
<td>Broadened focus to new areas of gaming entertainment, exploring new partnerships and opportunities.</td>
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<tr>
<td>3 – Expanding into new markets</td>
<td></td>
</tr>
<tr>
<td>Significant opportunities exist for expand into new regulated markets through organic opportunities as well as M&amp;A.</td>
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<tr>
<td>4 – Engaging and attracting new audiences</td>
<td></td>
</tr>
<tr>
<td>Entain will be at the forefront of leveraging opportunities created as new technology-enabled forms of entertainment continuously evolve.</td>
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</tr>
</tbody>
</table>

#### Sustainability

<table>
<thead>
<tr>
<th>5 – Focus on regulated markets</th>
<th>In 2021 nearly 100% of our revenue derived from nationally regulated or regulating markets.</th>
</tr>
</thead>
<tbody>
<tr>
<td>All revenues to derive from regulated markets by end of 2023.</td>
<td></td>
</tr>
<tr>
<td>6 – Lead on responsibility</td>
<td>Trialled our Advanced Responsibility &amp; Care™ (“ARC™”) programme to use technology to proactively intervene to prevent betting and gaming related harm developing. Established appropriate safer betting and gaming metric to link remuneration with safer betting and gaming practices.</td>
</tr>
<tr>
<td>Our technology enables us to continuously upgrade and personalise our protections for customers.</td>
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<tr>
<td>7 – Best in class standards of corporate governance</td>
<td>Strengthened and diversified our Board and governance practices under Chairman Barry Gibson. Appointed Robert Hoskin as Chief Governance Officer.</td>
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<tr>
<td>Ensuring the highest standards in all areas of our operations.</td>
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</tr>
<tr>
<td>8 – Best place to work and investing in our people and communities</td>
<td>In line with its with its commitment to donate £100m to good causes over five years, the Entain Foundation invested in research, education and treatment of problem gambling; its grassroots sports investment fund; and launched EnTrain, its diversity through technology programme.</td>
</tr>
<tr>
<td>Ensure Entain is the best place to work while contributing to communities where we are based and operate.</td>
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</table>
## Priorities for 2022

<table>
<thead>
<tr>
<th>KPIs</th>
<th>Risks</th>
<th>Remuneration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Market access</strong>&lt;br&gt;150m people</td>
<td>Technology failure. Loss of key locations.&lt;br&gt;Trading, liability and pricing management.&lt;br&gt;Increased cost of product.</td>
<td>Executive annual bonus is linked to Operating Profit, Online NGR growth and safer betting and gaming targets and customer metrics.</td>
</tr>
<tr>
<td><strong>NGR growth</strong>&lt;br&gt;+13%cc</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Online net gaming revenue</strong>&lt;br&gt;£3,067m</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Underlying EBITDA</strong>&lt;br&gt;£881.7m</td>
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</tbody>
</table>

### Our Purpose

**Bring moments of excitement into people’s lives**

- Enter new states as they regulate with market leading customer offer.
- Continue to innovate in existing markets focusing on product, brands and marketing.
- Identify new opportunities in the 50 regulated markets where we do not currently operate.
- Deliver new customer propositions outside of our traditional product offer.

### Priorities for 2022

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### KPIs

- **Market access**<br>150m people
- **NGR growth**<br>+13%cc
- **Online net gaming revenue**<br>£3,067m
- **Underlying EBITDA**<br>£881.7m

### Risks

- Technology failure. Loss of key locations.
- Trading, liability and pricing management.
- Increased cost of product.

### Remuneration

- Executive annual bonus is linked to Operating Profit, Online NGR growth and safer betting and gaming targets and customer metrics.

### Contribution to safer betting and gaming initiatives

- £12.9m

### Employee satisfaction with approach to wellbeing

- 87%

### Target set for carbon Net Zero throughout operations

- 2035

### Commitment to Entain Foundation over five years

- £100m

### Key:

- Achieved
- On target
- Not achieved
At Entain, sustainability is at the heart of everything we do, and we firmly believe that the most sustainable business will be the most successful business in our industry. Our Sustainability Charter underpins this approach and is built around four core principles: an exclusive focus on regulated markets; continuing to take the lead on responsible betting and gaming; best in class corporate governance; and investing in our people and local communities.

“...

We also have seen an increasing interest in our ESG performance and programmes from investors and other stakeholders.”

Virginia McDowell
Chair of the ESG Committee
We made significant progress across all four of these during the year, many of which we highlighted at our first Entain:Sustain event in November 2021. Globally, we lead the industry on responsibility, with revolutionising player protection at the core of our approach. We continue to make great progress with ARC™ with both the real-time customer interaction trials and the international rollout well underway. We were pleased to see the success of this approach recognised in May 2022 with the award of the Advanced Safer Gambling Standard by GamCare, the leading UK safer betting and gaming charity. Entain is the largest operator to be awarded the highest level of accreditation (Advanced Level 3) for its online activities, and Advanced Level 2 for its land-based activities, underlining Entain’s sector-leading approach to safer gambling.

In this report, we outline many of the areas where we have made significant progress across the four pillars of our sustainability charter in the past year:

An exclusive focus on regulated markets
- In 2021, over 99% of our revenues were from regulated markets
- We increased the number of domestically regulated jurisdictions from 27 to 31
- Exit three markets where we did not see a pathway to sustainable regulation

Continuing to take the lead on safer betting and gaming
- Successful roll-out of our pioneering ARC™ player protection programme across all UK online products
- Increased UK contributions of RET to 0.5% of GGY

Pursuing the highest standards of corporate governance
- 40% of our Board is female
- Jette Nygaard-Andersen appointed as CEO – the first female CEO of a UK-listed betting and gaming company
- Completed a third-party governance review
- Implemented a customer satisfaction metric into our Group Bonus scheme, as well as our other non-financial safer betting and gaming metric

Investing in people and our communities
- As the COVID-19 pandemic continued to impact our colleagues, customers, communities and business, we continued to support those most affected
- We launched EnTrain, a multi-million-pound diversity and inclusion project with the aim of reaching 1 million people by 2030
- #1 in the All-in Diversity Index
- 7% reduction in absolute GHG emissions from 2020, with 100% renewable energy in the UK and ROI retail estate
- Developed our near-term science-based greenhouse gas reduction target, which will be verified by the science-based targets initiative. We have also committed to setting a net-zero target by 2035, which will be verified by the SBTi

We also have seen an increasing interest in our ESG performance and programmes from investors and other stakeholders. To share our work, we held Entain:Sustain in November 2021 – our first ever ESG focused stakeholder event. Held as both a virtual and in-person event in London, Entain:Sustain featured presentations from the Group’s senior management, the independent Chair of the Entain Foundation and academics from the Harvard Medical School’s Division on Addiction.

The day also included a number of panel discussions, featuring a cross-section of sustainability experts. Alongside the main presentation, the event also featured an exhibition area with representatives from a range of the internal Entain initiatives as well as the Group’s external community investment partners such as Chance for Childhood and SportsAid. We were delighted that over 100 people were able to attend in person, and around 200 people virtually throughout the day. A key focus for the Board will be on holding a follow-up Entain:Sustain conference later in 2022.

Entain is the largest operator to be awarded the highest level of accreditation (Advanced Level 3) for its online activities, and Advanced Level 2 for its land-based activities, underlining Entain’s sector-leading approach to safer gambling.”

We also used the event to launch our first Entain Social Impact Report, which outlines some of the wider impact of our ESG programmes, and the work of the Entain Foundation around the globe.

It is pleasing to see our efforts being recognised externally, not only through the achievement of the Advanced Safer Gambling Standard (as noted above) but also through achieving cross-industry awards including being named Operator of the Year by EGR, Safer Gambling Provider of the Year by EGR North America and Safer and Socially Responsible Operator of the Year at the SBC Awards North America. Our continued membership of the FTSE4Good index and the Dow Jones Sustainability Index as well as being recognised as the second most admired company in the entire UK at Management Today’s annual awards are further recognition of our efforts.

I hope you enjoy reading this report and learning about progress and ambitions for the future. We are confident that our new way forward will allow us to recruit and inspire the best people in the industry, provide customers with entertaining, trusted and safe experiences, and support our community organisations that are doing great things.
At Entain, we have proudly put sustainability on an equal footing to our growth strategy. We embrace our role within society and want to take the lead on the issues that matter to us – sustainability, diversity, and responsibility – with the strongly held belief that the most sustainable business in our industry will be the most successful. This is reflected in our Sustainability Charter, which outlines our ESG leadership ambitions across four pillars.

Now in its second year, we have made significant progress across all four pillars, as highlighted below:

**Regulation**
- **Commitments:** Only operate in regulated markets by the end of 2023
- **2021 highlights:** Nearly 100% of revenues from regulated markets
- Exit three markets with no clear path to a sustainable and safe regulated betting and gaming industry

**Responsibility**
- **Commitments:** Take the lead on safer betting and gaming
- **2021 highlights:** Successful roll-out of our pioneering ARC™ player protection programme across all UK online products
- Increased UK contributions to RET to 0.5% of GGY

**Corporate Governance**
- **Commitments:** Best-in-class corporate governance
- **2021 highlights:** Jette Nygaard-Andersen appointed as CEO – the first female CEO of a UK-listed betting and gaming company
- 7% reduction of GHG emissions from 2020, with 100% renewable energy in the UK and ROI retail estate

**People & Communities**
- **Commitments:** Best place to work
- Net-zero greenhouse gas (“GHG”) emissions by 2035
- Launched Entrain
- #1 in the All-In Diversity Index
- 7% reduction of GHG emissions from 2020, with 100% renewable energy in the UK and ROI retail estate

*Long-term sustainability = Long-term success*
Aligning our commitments with the Global Goals

To make sure our focus is aligned with global priorities, we have undertaken an assessment of the UN Sustainable Development Goals, to identify our priority Goals where we can have the most impact on Society. Through this assessment, we have identified four priority goals where we can have the greatest impact. There are also two supporting goals where we will focus in order to support our priority goals. Throughout this report, we have outlined where we are making contributions to these Goals.
ESG Governance
Delivering on our Sustainability Charter and ESG commitments starts with robust governance. As our ambitions grow, and best practice evolves, we continue to expand our processes.

Board ESG Committee
The Board’s ESG Committee has oversight for safer betting and gaming, regulatory compliance, anti-money laundering (“AML”) and counter-terrorism financing, anti-bribery & corruption (“ABC”), health and safety, environmental impact, data protection and diversity in the workplace. Chaired by Virginia McDowell one of our Non-Executive Directors, the Committee has three members and guides the business on all aspects of ESG strategy, sets targets and monitors our performance.

With the increased focus on ESG, and the newly assigned responsibility of Principal Risks to the Committee by the Board, the meeting schedule increased from four to six in 2021. This ensured that the Committee’s agendas enabled them to cover the Group’s ESG activities and how these underpin the Group’s strategy. The Committee continues to oversee our approach to Net Zero, and the evolution of our strategy and processes in response to the Taskforce for Climate-related Financial Disclosures.

You can read more about the Board ESG Committee’s activities in the 2021 Annual Report. To read more about our approach to corporate governance in the section below.

The ESG Steering Group
The ESG Steering Group which meets on a monthly basis consists of functional leaders from across the business, including Investor Relations, Human Resources, Corporate Affairs, Legal, Health, Safety & Security, Operations, and Communications. Convened by our Head of ESG and Chaired by our Chief Governance Officer, the Group oversees the implementation of our sustainability strategy.

Climate governance
Given the urgent need for action to address the climate emergency, we have stepped up our governance in this area. Our CEO is now responsible for our approach to climate change, and climate-related risks and opportunities. In addition, we have developed our Net Zero Action Group. The Net Zero Action Group reports to the ESG Steering Committee. The Committee is a selection of leaders from around the business who are responsible for delivering and developing an organisation-wide approach for achieving our net-zero ambitions.

Issue-specific Committees
In addition to the ESG Steering Group and the Net Zero Action Group, we have formed groups that report to the ESG Steering Group that focus on delivering our approach to specific ESG issues that require additional expertise and insights from the business. Steering groups include groups focused on Anti-modern Slavery and Human Rights, Safer Betting and Gaming, Anti-Money Laundering, Diversity & Inclusion.
Materiality at Entain

We have a long-established discipline of assessing our material ESG issues. These material issues are reviewed annually as part of our internal ESG reporting process and updated based on any strategic and operational changes, as well as developments in the wider industry and society. Our current top material issues include:

- Industry self-regulation (safer betting and gaming)
- Protecting the young and the vulnerable through working practices
- Providing support for customers at risk and problem gamblers
- Customer privacy and data security
- Providing safe and responsible products, including safeguards inherent in design
- Promotion of safer betting and gaming
- Talent attraction and retention
- Preventing betting and gaming being used to support crime or associated with crime
- Diversity and equal opportunity

Towards the end of 2021, we commenced a project to conduct a full-scale review of our materiality assessment framework. This update will draw upon evolutions in materiality best practice, and align our process and issues considered to the strategic reorientation of our business and external landscape. The outputs and process will inform our ESG strategy going forward, help us to identify emerging ESG issues, and prioritise the material ESG issues relevant to investors, as well as our wider stakeholders.

As part of this process, we will conduct a comprehensive consultation across a broad range of our stakeholder groups through surveys, interviews and desk-based research. The outputs of our new materiality assessment will be presented later in the year.
Regulation

Gaming is a truly global market and in 2021 the Group held licences in 31 territories and jurisdictions. By the end of 2023, we have committed to only operate in domestically regulated or regulating markets. We are already making significant progress in this area, with over 99% of our revenues from regulated or regulating markets.

Operating only in domestically regulated markets allows us to deliver higher quality of earnings and ensure we can continue to grow into the future. In these markets, we can engage openly and proactively with regulators to ensure we can offer first class player protection through our cutting-edge technology and product platform, while upholding all licensing objectives, across multiple jurisdictions. It is the Group’s aim that by the end of 2023 we will only generate revenues from countries where we hold a domestic licence.

As part of this process throughout the course of 2021 and Q1 2022 we exited 10 markets where we did not believe there were realistic prospects of regulation. In the same period, we entered four new regulated markets, as well as securing licences in newly regulated markets such as Ontario, Canada in April 2022. In addition, our US joint venture BetMGM, continued to enter newly licenced US jurisdictions, with the brand going live in 13 states in 2021 and the first quarter of 2022.

To read more about regulatory developments, and how we engage with regulators, please refer to pages 35 and 39 of our 2021 Annual Report.
Through our award-winning Changing for the Bettor safer betting and gaming programme, we take a holistic approach to protecting the customers, investing millions into research, education and treatment. In 2021 we introduced ARC™ – Advanced Responsibility and Care™ – which takes a technology-led intelligent approach to risk reduction. Using revolutionary AI technology, ARC™ operates in real-time, and crucially, it is individually tailored for each customer. It is built on a foundation of academic research and is always working discretely in the background stepping in when needed.

We were pleased to see the success of this approach recognised in May 2022 with the award of the Advanced Safer Gambling Standard by GamCare, the leading UK safer betting and gaming charity. Entain is the largest operator to be awarded the highest level of accreditation (Advanced Level 3) for its online activities, and Advanced Level 2 for its land-based activities, underlining Entain’s sector-leading approach to safer gambling.

In addition to the ARC™ programme, which cuts across the pillars of our Changing for the Bettor strategy, we continue to deliver on the seven areas through our other initiatives, as outlined in the next pages.

It all starts with our seven principles for safer betting and gaming:

1. **Understand the problem**
   To reduce gambling harm, we need to know as much as possible about it. So we’re funding research to help us find the best solution.

2. **Educate stakeholders**
   We’re helping to educate thousands of young people and professionals about the potential risks of gambling harm and how to avoid them.

3. **Promote responsible attitudes**
   Through advertising, marketing and sponsorships we’re promoting social responsibility.

4. **Empower customers**
   Within our products, we’re adding features that help customers to gamble safely. Within our processes, we’re using tech to lead the way in detecting problematic play, and within our industry we’re working to collaborate and innovate.

5. **Fund treatment for those in need**
   We’re funding treatment and support for people who suffer from gambling harm.

6. **Champion responsible product design**
   With ‘responsible design’ principles, we’re making sure our products are safe as well as fun.

7. **Change ourselves for the better**
   At Entain, safer betting and gaming is everyone’s business. We’re making sure that everyone we work with knows safer betting and gaming is core to all that we do.
Advanced Responsibility and Care (ARC™)
Using data and technology to provide sector-leading player protection

ARC™ is our pioneering approach to customer protection, by limiting customer exposure to risk at an individual level. It switches our player protection approach from reactive to proactive, and allows players to receive the intervention they need in real time, not after the fact. ARC™ represents a fundamental shift in our approach to player protection, and is the driving force behind our vision to be the go-to platform for safe play.

Using behavioural indicators, data science and analytics to assess risk in betting and gaming, ARC™ works behind the scenes using advanced artificial intelligence to learn and identify risks in player behaviour so we can intervene before a problem develops.

In 2021, we commenced live trialling of ARC™ in the UK, and by the end of 2021, ARC™ was rolled out across our entire platform for all UK jurisdictions. In 2022, we will commence our work on adapting and implementing ARC™ in some of our key markets outside of the UK.

What does ARC™ involve?

Protector Model: Identifying high-risk behaviour in real time

Our leading Protector Model was launched in June 2021. It allows us to identify and understand customers who need our support the most, intervening with measures which are specific to their needs. ARC™ significantly extends the markers of protection beyond merely financial markers to other behavioural characteristics that might suggest high-risk playing. Our model draws upon 26 research-backed markers - over three times more than in the past - adding further sophistication to improve the accuracy of identifying high-risk behaviour. As a result, we found that our predictor model is able to identify high-risk behaviour with 80% accuracy.

These markers developed through our partnerships with leading research institutions and consultancies, including lived experience insights from EPIC Risk Management, Professor Mark Griffiths of Nottingham Trent University, and Cambridge Health Alliance Division on Addiction, a Harvard Medical School Faculty. Examples of these markers include fluctuations in stake levels, erratic play during a single session and signs that a player might be chasing losses.
Support for higher-risk players

Through a complete redesign of the user experience and customer communications together with the deployment of two new gambling controls (Play Break and Deposit Curfew) we have been able to significantly increase the use of account controls. The on-site interactive interceptors have meant that as well as being able to intervene and speak to a customer quickly, we can also recommend a gambling control for that customer based on their specific play and needs. These interceptors have resulted in more than 90% of our highest-risk players showing a reduction in risky play.

As part of ARC™ we have also made step-change improvements in some of our safer gambling tools, including a budget calculator and improvements to our safer gambling help page – providing players with seamless access to engaging and research-backed safer gambling support and content.

Protect using real-time interventions

We are using advanced analytics real-time capabilities of our Protector Model to identify customers who deposit more than they usually would within a session of play. Once identified, a customer will initially be advised that they are depositing more than normal and offered the chance to reassess their depositing. If they do not take action by setting a control themselves, we will step in and prevent further deposits from being made.

As a result, we are seeing positive actions by customers with a reduction in higher deposits and a significant reduction in the number of customers who raise their depositing. Encouragingly, we also see a 25% decrease in deposits following the initial interaction, and a 75% decrease in the number of players who previously would have continued to increase their spending. Almost all customers return to their previous betting norms shortly after intervention by ARC™. This means our messaging is positively guiding their experience to remain safe.

Our plans for 2022

ARC™ is continually improving, with regular testing and expert analysis to build on our initial successes and further enhance player protection. In 2022, we will continue to build on the success of ARC™, with an exciting roadmap of individualised features and improved modelling that will enhance its effectiveness and functionality.

Real-time tools: Over the coming months we will be implementing more real-time tools including those concerning long session lengths, declined deposits and large withdrawals.

Product-specific initiatives: We will also be implementing product-specific initiatives that will provide player support at a more granular level.

Real-time player identification: We are further developing our Protector Model to enhance its real-time predictive nature and potentially halt any risk-conducive behaviour before it becomes a problem.

International: In addition, we will also introduce ARC™ into markets beyond the UK, with a target to introduce it to nine new markets in 2022. We will adopt a staged approach to the international roll out, to ensure that ARC™ provides the same high level of player protection, whilst adapting it to meet the unique regulatory, cultural, and game-specific requirements in each market.

The effectiveness of ARC™ is linked to remuneration

The importance of ARC™ and our commitment to ESG and safer gambling is reflected in our colleague and executive remuneration structure. In 2021, 15% of the Group annual bonus scheme was based on the business demonstrating that the ARC™ models are successfully implemented, able to understand who the problem gamblers are, and why they’re classified as such. To ensure the credibility of the process, we commissioned EPIC Risk Management to provide an independent review which determined that we met our targets for the year.

In 2022, the ESG component of our Group annual bonus scheme will continue to focus on ARC™, but will pivot to incentivise the international roll-out of ARC™, and its ability to drive behavioural change in customers – including the uptake of safer gambling tools to medium and high-risk players.
A key focus for our Changing for the Bettor strategy is to continually deepen our understanding of gambling-related harm, disseminate this knowledge with the wider industry, and incorporate this knowledge into our processes, policies and culture. This work is catalysed by developing long-term research partnerships with world-leading institutions in safer betting and gaming.

Our five-year research collaboration with Cambridge Health Alliance Division on Addiction is our flagship research programme, where we have committed £5m over five years including over £850k in 2021. You can read more about this collaboration on page 15.

In the US, we have partnered with the University of Nevada, Las Vegas and their International Gaming Institute (“IGI”). In September 2021, we provided a founding grant to the IGI to establish a pioneering betting and gaming research initiative which, for the first time in the US, will combine scientific research with operational expertise to apply best practice in responsible gambling, policy, and health. Using a multidisciplinary approach, the IGI plans to take a holistic look at all aspects of betting and gaming from various perspectives, including problem gambling, responsible gaming, public health, education, economic impacts, research, and technology. The centre is planned to launch in 2022.

"Entain’s exceptional support of independent gambling research is fundamental to our advancement of a scientific understanding of gambling and internet gambling, including the problems that people might experience with these activities. Gambling-related harms can be devastating. Accordingly, we take seriously our responsibility to produce the most rigorous research possible, to provide Entain with actionable information for player safety."

Debi LaPlante, Ph.D.
Director, Division on Addiction, Cambridge Health Alliance, Associate Professor, Harvard Medical School
Entain’s cutting edge research collaborative with Cambridge Health Alliance Division on Addiction, a Harvard Medical School Faculty

3.2m contributed by Entain

13 submitted research papers

13 of Entain’s safer gambling training programs reviewed

8 FTE researchers, health educators, and staff

16 research presentations, teach ins, panels, and posters

Our five-year research collaborative with the Division continues to go from strength-to-strength. Now in its third year, we have already contributed $3.2m to this cutting-edge research programme that is having real-world impact. The programme has progressed beyond expectations. It was originally expected to produce three papers annually, but in two and a half years the research team has already submitted 13 papers for publication and has an additional three papers in active development for submission to peer review.

Our ongoing support for the collaboration currently funds the equivalent of eight researchers: partial time for six researchers at the doctoral level, three health educators at the master’s level, two researchers at the baccalaureate level, and one research administrator. Entain not only provides funding but has given access to anonymised data from player records, ensuring that some of the research is based on real-life data and behavioural patterns.

The ongoing projects with the Division fall under the four categories below. This important research is published in peer-reviewed and high-impact scientific research articles, with worldwide circulation. The journals include Psychology of Addictive Behaviors, PLOS One and International Gambling Studies.

### Player data research projects
Using real-life, anonymised player records from Entain to contribute to a growing body of knowledge revealing the nature of actual online gambling. These projects help refine our understanding of evidence-based markers of disordered gambling and expand our search for potential markers.

### Safer betting and gaming training projects
This in-depth understanding from the research is vital to strengthen our culture, processes, and policies. We disseminate learnings from the research to employees through various training activities. The Division conducted reviews of 13 existing Entain employee training programmes, three teach-in seminars with select Entain employees to assist in the digestion and understanding of the findings, and the creation of seven research snapshots with graphical summaries of published research. The collaborative has also provided clinical insights into our partner EPIC Risk Management’s training programmes.

### Open science projects
Projects that relate to the Division’s and Entain’s commitment to the highest standards and upholding the principles of academic freedom. In addition to engaging in open science practices for these research projects, including research pre-registration and data transparency, the Division has engaged in multiple projects and papers to advance the field of gambling studies toward more open science practices. With our support, they have published the first ever open science papers focused on gambling studies.

### General projects
These projects address important areas in the field of gambling studies. So far, they have included a study on the state of the literature about gambling and self-harm and understanding gambling product safety features.
We continue to partner with charities and other organisations to support their important work in preventing vulnerable audiences from potential betting and gaming harm. This includes our partnership with EPIC Risk Management and their Schools Programme. We also support Young People’s Gambling Harm Prevention Programme (“YGAM”) through GamCare and YGAM as part of our involvement with Betting and Gaming Council.

We also work with EPIC in the US, where we supported them to deliver 71 first-of-its-kind education and advice sessions to groups that may be more likely to experience problems with betting and gaming – such as college and professional athletes. As sports betting is licensed and launched in an increasing number of states, this programme ensures that knowledge about harm prevention and sports betting integrity is front and centre of conversations at a time when it is needed most. We will continue to scale up this programme in 2022.

Also in the US, we launched the Gamble Responsibly America App. The app – freely available on phone iPhone and Android – provides a host of educational resources and tools to help and support anyone facing potential issues with problem gambling. It is the first app of its kind in the US that is from the outset available in both English and Spanish. Gamble Responsibly America has been endorsed by the American Gaming Association as one of the key sources of problem and responsible gambling information.

In the emerging area of esports, we are working to raise awareness about gambling-related harms. We are working with GameQuitters, a global platform for mental health awareness, education and advocacy for gamers and their families. With funding from Entain Foundation US, they recently launched Mind Your Game, a new awareness campaign to target specific gambling-related concerns in gaming and esports. In its first year, the initiative is on track to reach over 500,000 people online, with 18 people referred to online therapy services through Kindbridge teletherapy services.

We also support EPIC’s partnership with the Counter-Strike Professional Players’ Association (CSPPA). Announced earlier in 2021, it is a first-of-its-kind safer gambling esports partnership to provide ‘impactful and proven awareness, education, and risk-management programmes’ to CSPPA members through a series of harm awareness sessions.

Our partnership with YGAM and GamCare

By 2024, YGAM and GamCare aim to work with over 13,400 practitioners and partner organisations, resulting in millions of young people aged 11-19 receiving at least one awareness session during their secondary or further education. By the end of 2021, the programme delivered training to 4,500 young people, with 90% of those participating reporting that they better understand how to make safe choices about betting and gaming, and where to get help if they were experiencing problems. In addition, we have supported YGAM to deliver their City & Guilds Assured training to 3,895 professionals that work with young people. This training is focused on identifying signs of harm and signposting to the help and support available.

90% of participants reporting that they better understand how to make safe choices about betting and gaming

In the year ahead, the programme will focus on recruiting a youth advisory board to embed the opinions and views of young people at the heart of the programme. The continual improvement of the BigDeal website dedicated to young people’s information; advice and support; and the roll out of a comprehensive content framework, which will allow parents, professionals and young people to pick workshops from a range of interrelated topics to betting and gaming related harms.
EPIC Risk Management’s Schools Programme

15,284 young people reached by impactful gambling harm awareness sessions delivered by EPIC across 81 school visits in the 2020/21 academic year.

EPIC Risk Management is a leading provider of advice, training and expertise in minimising and preventing harm. EPIC’s main objective is simple: learning from lived experience to take the problem out of gambling. To succeed in this, they continue to develop and deliver effective programmes that either directly or indirectly (through work with operator staff) to reach potentially vulnerable groups. In addition to commissioning EPIC to provide training sessions to Entain colleagues, we support EPIC to reach vulnerable populations and deliver awareness and harm minimisation programmes.

In the UK, we supported EPIC’s Risk Management’s State Schools programme. EPIC delivered impactful gambling harm awareness sessions to 15,284 young people across 81 school visits in the 2020/21 academic year.

Qualitative research has been carried out to review the method of delivery and positive feedback has been provided to the interviewees by students, staff, and the students’ parents. A high level of engagement from the audience with the session was reported and that the emotive nature of the testimonial education made the session content powerful. Educational benefits of the sessions were highlighted to be the ability to raise awareness about what problem gambling is, the types of gambling which one can engage in, the stages of addiction, the consequences of addiction to the addict and significant others, behaviours associated with problem gambling, and the reality that anyone can be susceptible to problem gambling.

EPIC have partnered with researchers at the University Campus of Football Business (“UCFB”) to measure the effectiveness of these sessions.

“Safer gambling and harm prevention have never been more important than they are right now. With the Gambling Act Review in the UK and the fast paced growth of sports betting in the USA the work that EPIC, Entain and the Entain Foundation are doing together has never been more needed or innovative. We look forward to even greater collaboration in the future.”

Paul Buck
CEO, EPIC Risk Management
As part of our ARC™ programme, we made step-changes in the safer betting and gaming tools that we provide to customers to empower them to be in control of their play. In addition, we have implemented an improved budget calculator to help customers understand a safe level to play based on their individual circumstances, and recommendations on setting deposit limits. These will be further enhanced in 2022 with the introduction of our safer gambling questionnaire, which will help customers understand whether a gambling control is needed and, if so, which one. We will also continue to improve our real-time interactions and intervention with customers, to provide them with recommendations that empower them to put in place the tools that help them to continue playing responsibly.

For those customers who wish to take time out altogether, we also continued to promote the use of the Gamban software, which we make freely available to all of our customers. Gamban allows users to block betting and gaming websites and apps globally from their devices. We continue to take part in all relevant industry-wide self-exclusion programmes in the markets where we operate. In the US, BetMGM our joint venture with MGM Resorts, is amongst the first operators to have supported PlayPause, a project intended to introduce cross-state self-exclusion.

Responsible attitudes to advertising and marketing start with us, and we’re committed to ensuring that our activities in these areas uphold both the letter and spirit of the relevant legislation, regulations and industry Codes of Practice. We are a signatory of the European Betting and Gaming Association’s Code of Conduct. Our approach is guided by our Group Responsible Marketing Policy (“Policy”). This Policy is sponsored by the Chief Governance Officer – also a Director on the Entain plc Board. The Policy applies to all marketing activity undertaken by all brands within the Group and applies to all marketing activities and channels. The Policy is complemented by internal guidelines for each market where we operate, including examples of acceptable and unacceptable marketing behaviour.

In the UK, we work with the industry via the Betting and Gaming Council (“BGC”) and the industry’s commitment to strengthening and expanding codes of practice for advertising and marketing. This includes utilising our marketing budget and airtime for responsible gambling initiatives, ensuring that social media ads are targeted at people over 25 years old, and only showing YouTube ads to accounts that have been age-veriﬁed.

We also use our reach and partnerships to bring safer betting and gaming to life via compelling content. Through our partypoker brand, we worked with the McLaren Formula 1 team to produce the “Time to Pit” campaign. Starring McLaren F1 star Daniel Ricciardo, the video and microsite draws parallels between racing and betting and gaming, and the importance of knowing your limits and staying in control. The “Time to Pit” campaign has been viewed over 40,000 times.

As part of our ARCTM programme, we continue to promote responsible attitudes to advertising and marketing. Under our Group Responsible Marketing Policy (“Policy”), which is sponsored by the Chief Governance Officer who is also a Director on the Entain plc Board, the Policy applies to all of our marketing activity undertaken by all brands within the Group and applies to all marketing activities and channels. The Policy is complemented by internal guidelines for each market where we operate, including examples of acceptable and unacceptable marketing behaviour. In the UK, we work with the industry via the Betting and Gaming Council (“BGC”) and the industry’s commitment to strengthening and expanding codes of practice for advertising and marketing. This includes utilising our marketing budget and airtime for responsible gambling initiatives, ensuring that social media ads are targeted at people over 25 years old, and only showing YouTube ads to accounts that have been age-verified.

Empower customers

As part of our ARCTM programme, we made step-changes in the safer betting and gaming tools that we provide to customers to empower them to be in control of their play. As part of the enhanced customer journeys in ARCTM, we are now able to proactively provide players with tailored recommendations and informative content based on their style of play. In addition, we have implemented an improved budget calculator to help customers understand a safe level to play based on their individual circumstances, and recommendations on setting deposit limits.

These will be further enhanced in 2022 with the introduction of our safer gambling questionnaire, which will help customers understand whether a gambling control is needed and, if so, which one. We will also continue to improve our real-time interactions and intervention with customers, to provide them with recommendations that empower them to put in place the tools that help them to continue playing responsibly.

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For those who find that they are experiencing problems with gambling, we partner with organisations that share our commitment to safeguarding the wellbeing and welfare of people who need help if their gambling starts to affect their lives. We highlight three leading organisations that we support directly, and which are providing cutting edge treatment for those most affected by gambling harm.

£200k+
contributed in 2021 to directly support organisations that are treating those in need

As part of these contributions, we partner with Cognacity, a team of world-leading experts in mental health care and services, with specialist expertise in gambling related harm. Cognacity are an approved LCCP Research Education and Treatment provider. Cognacity offer additional support for those customers requiring clinical diagnosis, or support/signposting for treatment. The outcome of the assessment may result in a referral to a fully funded residential treatment programme with Cognacity@Leon House. Leon House Health and Wellbeing is the UK’s leading residential mental health and addiction clinic. Cognacity@Leon House delivers the short-burst residential treatment programs for problem gambling from Leon House’s purpose-built 24-bedroom residential facility in Manchester.

Over the past two years, Entain funding has enabled 154 comprehensive assessments and 100 individuals to access support, including 67 individuals accessing 3-day intensive residential (or online during the pandemic) gambling treatment programme, followed by individual follow-up therapy and relapse prevention sessions. The outcomes from the programme have been positive, with 86% reporting abstinence from gambling at last observation (six or 12 months after the programme), with improvements in self-reported ratings of quality of life before versus after the programme.

At the heart of championing responsible product design is our groundbreaking ARC™ programme, which has catalysed a step change in the way our online products are designed in order to maximise player protection. You can read more about ARC™ on pages 12 and 13.

In addition, we engage with the wider industry to embed responsible product design across all licensed operators. To do this, we sit on the Betting and Gaming Council (“BGC”) Game Design Working Group. The group focuses on game characteristics, informed player choice, enhancing control innovation and governance and continuous improvements. In 2021, we implemented the BGC working group Phase II principles on Game Design, including guidance on wins below the stake line, and bonus game notifications. We continue to work with this group to further enhance the standards and engage with other stakeholders to ensure industry-wide improvements to responsible game design.

One of the key aims of the group is to work with key stakeholders to solve the challenge of sharing data on vulnerable customers, whilst complying with personal data protection regulations. This aligns with our work on implementing privacy-by-design principles, and the strengthening of our data privacy policies, which is discussed on page 32.

Through the Entain Foundation, we also support Gordon Moody, a charity dedicated to helping people reclaim and rebuild their lives free from gambling addiction through recovery in a safe, supported environment. Our support helped Gordon Moody make much needed improvements to their treatment facilities during the COVID-19 period. Gordon Moody also developed a weekly support programme for those awaiting treatment who are at risk of disengaging and returning to harmful play. This has increased the retention rate of those initially seeking treatment who stay engaged in the programme and go on to receive the treatment they need. In 2021, the weekly support has helped to improve this retention rate to over 70% – up from 44% in 2019 – and helped Gordon Moody to better understand complex cases.

Fund treatment for those in need

Champion responsible product design
We understand that responsibility starts with us. All employees, relevant suppliers, contractors and secondees must undertake annual training on safer betting and gaming, which is in addition to our Code of Conduct training which also covers these elements. At the end of 2021, 88% of colleagues were up to date on their mandatory safer betting and gaming training, with 11,216 retail and 914 digital colleagues receiving face-to-face training specific to their roles. Our customer service teams received training from our partners EPIC Risk Management, which empowered them to spot the signs of risky behaviour and utilise behavioural and interaction training to provide effective and empathetic customer interactions.

Our customer protection teams have been brought together with the Anti-Money Laundering teams, which gives our teams a holistic view and standardised approach across our customer due diligence. These teams are provided with a dashboard, including the markers of protection developed through ARC™ to help determine the best course of action. We continue to work with partners and internal teams to train these algorithms to further improve the effectiveness of these markers of protection at predicting at-risk behaviour. Taken together, these process improvements have allowed us to increase the number of outbound interactions with our customers year-on-year and refer them to the correct team to take the appropriate action. The processes of our customer teams related to safer gambling interactions are audited by EPIC Risk Management, who also sit on a sample of our customer calls to provide quality assurance which provides another key input into staff training.

Our Customer Ombudsman Director (“COD”), initially appointed in 2020, is responsible for overseeing our customer interactions, to ensure that fairness is at the heart of all of our interactions. The COD evaluates the quality of interactions with our players, reviews how complaints are handled, and suggests ways in which we can improve our service in a measured, consistent and responsible manner whilst ensuring the business is protected from unjustified complaints.

<table>
<thead>
<tr>
<th>Safer betting and gaming performance</th>
<th>2021</th>
<th>2020</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash and in-kind contributions towards responsible betting and gaming initiatives</td>
<td>£12.9m</td>
<td>£9.7m</td>
<td>£3.6m</td>
</tr>
<tr>
<td>Customer interactions regarding problem gambling¹,²</td>
<td>2,268,550</td>
<td>1,390,906</td>
<td>1,067,908</td>
</tr>
<tr>
<td>Customer complaints¹,²</td>
<td>4,045</td>
<td>6,378</td>
<td>15,692</td>
</tr>
<tr>
<td>Customer complaints specifically related to a betting and gaming transaction¹,²</td>
<td>655</td>
<td>919</td>
<td>2,031</td>
</tr>
<tr>
<td>Self-exclusions made¹,²,³</td>
<td>61,644</td>
<td>59,465</td>
<td>137,391</td>
</tr>
<tr>
<td>Robberies</td>
<td>36</td>
<td>45</td>
<td>110</td>
</tr>
<tr>
<td>Anti-social behaviour</td>
<td>4,216</td>
<td>4,760</td>
<td>6,065</td>
</tr>
<tr>
<td>Assaults</td>
<td>132</td>
<td>204</td>
<td>345</td>
</tr>
</tbody>
</table>

1. Data covers all UK licences.
2. 2020 and 2019 data have been restated to removed discontinued licences, to be comparable to 2021 data.
3. Data only includes self-exclusions made via Entain’s own processes (e.g. via customer services), and does not include third-party self-exclusion schemes such as, for example, GAMSTOP (National Online Self-Exclusion Scheme) and the Multi Operator Self Exclusion Scheme.

As a result of our call listening project where we QA calls from [customer] teams we identified an analyst who was demonstrating gold standard interactions. We then met with her in the office in Gibraltar and consulted on our next version of interactions training. With her help we have incorporated her top 5 tips on how to conduct great interactions. This will then be trained out this year to 150 colleagues across September and October.”

EPIC Risk Management
A key pillar of Entain’s sustainability strategy is to adopt a gold standard corporate governance. This is delivered through a robust framework of oversight and control that utilises the knowledge and experience of the Board, the executive and senior members of the management team. In our 2020/21 ESG Report, we reported that we had commissioned a corporate governance and compliance review by an independent third party – Alvarez & Marsal – to get an objective analysis and avoid Entain being accused of marking its own homework. This thorough review process, which took several months and with which all colleagues cooperated concluded well. We are pleased to report that the results of the report were positive, with Alvarez & Marsal finding that:

Whilst the Board was pleased with the overall conclusion, it recognises Entain is on a journey and so there were some recommendations coming out of the report, which we will address going forward to continue to strengthen our governance processes.

Best-in-class corporate governance

Board composition and independence

The Board has responsibility for establishing the Group’s purpose, values and strategy, as well as overseeing the conduct of its business and promoting the long-term sustainable success of the Group, generating value for shareholders and contributing to wider society.

Since our last ESG report, the Board appointed Mark Gregory as an independent Non-Executive Director as the Chair of the Remuneration Committee. The Board now consists of the Chairman, three Executive Directors and seven independent Non-Executive Directors, with female Directors making up 40% of the Board’s membership.

In last year’s Report we outlined that Sandeep Tiku, Entain’s COO was due to become a Director once he relocated from India to Gibraltar. Subsequently Mr Tiku announced he was leaving to pursue an opportunity outside of the Group. As a result, the Board will not meet the recommendations of the Parker Review on an ethnically diverse composition. The Board remains committed to the view that an inclusive and diverse membership results in optimal decision-making. Our Nomination Committee is undertaking an active search to appoint a Director from an ethnically diverse background, which it expects to complete later this year. To support this, we have developed a Board Diversity Policy, which is now publicly available on our website.

In our view, Entain has put in place all the key components of a compliance framework to enable it to identify and manage its general compliance and regulatory risks.”

“IT is clear that there has been a significant investment in both resources and technology to develop and implement the compliance framework over recent years. The arrangements provide for clear Board and senior level oversight of compliance risk and how it is being mitigated, including through a governance structure of committees that enables oversight, discussion, and escalation of issues. We observed a good ‘tone from the top’ that is driving the development of strong governance over compliance issues.”

“We noted a strong culture during our interviews with key staff and executives of driving improvement and enhancement. The committee and escalation framework provides a mechanism for issues to be escalated to the appropriate level. We noted that management responds appropriately to Internal Audit issues and challenge from the Board and its Committees.”

Whilst the Board was pleased with the overall conclusion, it recognises Entain is on a journey and so there were some recommendations coming out of the report, which we will address going forward to continue to strengthen our governance processes.
Board of Directors
(as at 27 May 2022)

Attendance

Meetings attended: 100%

Tenure

Years: 0 1 2 3 4 5 6

Barry Gibson
Jette Nygaard-Andersen*
Rob Wood
Robert Hoskin
Pierre Bouchut
Stella David
Mark Gregory
Vicky Jarman
Virginia McDowell
David Satz

*As CEO, 3 years including as NED

Age

No. of Directors 40-44 45-49 50-54 55-59 60-64 65-69 70+

4 3 2 2 3 1 5

NED Experience / Skills: No. of Directors

Gaming Sector 4
Financial 3
Legal / Regulatory 2
Technology / eCommerce 2
Marketing 3
Entertainment 1
Leadership 5

Diversity

No. of Directors
British 6
American 2
French 1
Danish 1

Gender

4:6

Entain plc | ESG Report 2021/22
Entain’s purpose is to revolutionise gambling to create the most exciting and trusted entertainment for every customer; this puts stakeholders at the centre of the Board’s decision-making. Over the year the Board sought to promote our purpose and strategy and made decisions having considered the matters set out in S172 of the Companies Act 2006 (UK). As an Isle of Man incorporated company, Entain is not subject to the reporting obligations under Section 172 of the Companies Act 2006 (UK). Nevertheless, the Board recognises the importance of effective governance and intends to operate in line with the UK reporting regulations. In 2021, the Group complied with the principles and provisions of the 2018 UK Corporate Governance Code.

The Board has responsibility for leading the Group’s stakeholder engagement and considering the implications of key decisions on the Company and its stakeholders. The Board recognises that effective engagement with our stakeholders will drive long-term value creation, making Entain a company that people want to invest in, buy from, partner with and work for.

Entain has identified six stakeholder categories and our report on Board Activities provides an overview of how the Group’s key stakeholders are considered in Board discussions and deliberations on strategy:

- Communities
- Customers
- Employees
- Regulators
- Suppliers
- Shareholders

During the year, the Board gave regard to the differing needs of its stakeholders in its decision making, recognising that the global pandemic had impacted their interests and views – for example, balancing the need to preserve cash to support our people, suppliers, customers and communities during a time of uncertainty versus our shareholders’ wish to receive dividend income.

Our People

Virginia McDowell, in her capacity as Designated Workforce Director, remains a regular attendee to Employee Forums, enabling her to provide the Board (and its Committees) with informed feedback and insight into the realities of everyday working life at Entain. She attended Entain’s Global Conference (representing colleagues across the Group) in December 2021. Throughout her attendance, Virginia actively engaged in conversations around the ongoing employee impact of the pandemic; mental health and wellbeing; women in leadership initiatives; the future of hybrid working models; and the cultural embedding of responsible betting and gaming practices within the Group.

Other Board members, including Mark Gregory (Chair of the Remuneration Committee), also attended Entain’s Global Conference, answering questions from colleagues on a range of topics, including talent acquisition and retention initiatives; employee onboarding and training programmes; as well as the cultural embedding of company values, and the importance of the 2035 drive to reach net-zero.

Board attendance at such events facilitates effective oversight of everyday life within the company for our employees; and enables the Board to:

- Understand how the strategy has been translated and implemented into everyday working practices.
- Gauge the degree to which the Group’s values have been culturally embedded.
- Understand what really matters to our colleagues.
- Engage with our colleagues in open, honest and candid conversations.

Shareholders

The Board receives feedback on shareholder views in different ways, including through the Chairman and executive management who meet regularly with shareholders throughout the year, as well as an investor study compiled by an independent third party. Board members listen in to results and trading updates held by the Group for analysts and institutional investors and can hear directly the questions and comments on Company performance.

The Chairman held one-to-one meetings with major institutional investors during the year, including during the two potential offers for the Group, collecting their views and sharing these with the rest of the Board. In addition, the Chair of the Remuneration Committee held calls with large institutional investors to discuss and receive feedback on potential developments for our Remuneration Policy.

An overview of the Board’s discussions on governance and its impacts on stakeholders and a summary of the Board’s discussions on strategy and performance can be found in the 2021 Annual Report.
Board training and effectiveness

The Chairman has overall responsibility for ensuring that Directors receive suitable training to enable them to carry out their duties. Training is also provided by way of reports and presentations prepared for each Board meeting, as well as meetings with Group employees and external advisers. During the year the Board received training on the Criminal Finance Act and Anti-Bribery and Corruption legislation, developments in HSSE requirements and GDPR and the duties of directors.

The Chairman is assisted by the Company Secretary in providing all new Directors with a comprehensive induction programme on joining the Board. The induction programme provides new Directors with an understanding of their duties as Directors, the Group, its businesses and the markets and regulatory environments in which it operates. This includes meeting with senior executives and their direct reports. The process also provides an overview of the Group’s governance practices. Non-Executive Directors will have further content tailored to the Board Committees that they will join.

In 2022, Entain engaged Lintstock to facilitate an external review of Board performance. Lintstock is an advisory firm that specialises in Board performance reviews and has no other connection with the Company. The first stage of the review involved Lintstock engaging with the Chairman and Company Secretary to set the context for the evaluation, and to tailor survey content to the specific circumstances of Entain. All Board members were requested to complete an online survey on the performance of the Board, each of the Committees and the Chair. Lintstock subsequently interviewed each of the Directors, enabling them to expand on their responses to the survey, and to raise any further issues they wished to discuss.

As well as addressing core aspects of Board and Committee performance, the exercise had a particular focus on the areas, such as:

- The governance around risk management, and the Board’s oversight of key risks facing Entain.
- The Board’s oversight of opportunities and threats facing the business, including in terms of competition, technology and data, regulation and ESG / sustainability.
- The oversight of organisational capacity and succession planning for key leaders.
- The interaction with key stakeholders, including major investors, customers and employees, and the processes in place to facilitate Board engagement with these groups.

For a full list of the focus areas, please refer to page 102 of the 2021 Annual Report.

Following the sequence of Director interviews that took place in February and March 2022, Lintstock has prepared a report on the findings, alongside a comparison with the Lintstock Governance Index, which helps to place performance into context. It is planned that the outcomes will be discussed at a meeting of the Board in Q2 2022.

During the year the Board received training on the Criminal Finance Act and Anti-Bribery and Corruption legislation, developments in HSSE requirements and GDPR and the duties of directors.”
We are mindful of the continued focus on ESG performance and are pleased to introduce our new customer metric and to explain how the safer betting and gaming metric will operate in 2022. The evolution of our annual bonus metrics highlights how we are working to embed sustainability across all aspects of the business.

Safer betting and gaming

In 2021, Entain introduced a safer betting and gaming metric to our annual bonus based on the development of our player protection algorithms. The full metric comprised of two equally weighted parts at 7.5% each (15% in total):

- UK market – based on the Group’s progress in rolling out new significantly enhanced protection trackers, within the Advanced Responsibility & Care™ programme, with the aim of improving our ability to identify, and provide tailored support and interactions to, those most at risk.

- International market – based on the Group’s progress in rolling out new markers and algorithms (bespoke by territory) within at least 10 less mature international markets, applying our learnings and best practice to improve our player protection offering.

EPIC Risk Management, the leading gambling harm minimisation consultancy, independently reviewed the work carried out and provided advice to the ESG Committee which has enabled it to make a recommendation on the outturn to the Committee. At its year-end assessment the ESG Committee determined it was satisfied that these metrics had been fully met and made a positive recommendation to the Remuneration Committee as part of its assessment.

In 2022, we are keen to continue the evolution of the safer betting and gaming metric by further enhancing our systems and processes, continuing to improve the detection and prevention of problematic play. For 2022:

- Half of the total will relate to the UK market, where we will target the usage of our active account management tools amongst risk assessed online customers. Through our Advanced Responsibility and Care™ (“ARC™”) platform we are able to monitor and categorise player behaviour and interact with the customer to effectively influence behaviour, thereby providing a more positive and safer experience.

- The other half will relate to markets outside the UK. The deployment of ARC™’s advanced models and technologies, tailored to each country’s regulatory requirements, culture and maturity, gives us an opportunity to offer the same targeted interactions and overall experiences to a large number of our players around the globe.

- In addition, to reach the threshold level for pay-out under this metric, and show our internal commitment, minimum levels of completion of safer betting and gaming and other relevant compulsory training modules must be achieved by our colleagues globally.

In 2022, the ESG Committee will again have oversight of the safer betting and gaming metric, and will receive input from EPIC Risk Management when reviewing and evaluating the delivery against targets, prior to recommending the outcome to the Committee.

Customers

In 2022, we will include a customer target in our annual bonus metrics, making up 5% of the 2022 Annual Bonus plan. Customers are a key priority for Entain, and the new metric is designed to align an element of the annual bonus with the achievement of great customer outcomes.

We will use Net Promoter Score (“NPS”) to measure performance across our brands with the final outcome assessed at Group level. NPS is a customer loyalty and satisfaction measure that companies use to track promoters and detractors, producing a clear measure of an organisation’s performance through its customers’ eyes. It is easily understood by employees, aligns with our strategic direction and the results will enable us to take appropriate actions to improve our customers’ experience.

5% of the 2022 annual bonus plan will be based on our new customer metric and 15% will continue to be dedicated to safer betting and gaming. The 2022 performance metrics will therefore comprise an 80% financial and 20% nonfinancial weighting.

Customers are a key priority for Entain, and the new metric is designed to align an element of the annual bonus with the achievement of great customer outcomes.”
An update on Covid-19

Covid-19 continued throwing serious challenges at businesses and society in 2021 – and we were no exception. We started the year suspending our entire retail estate over three months. Throughout the ups and downs of 2021, we spared no effort to continue protecting our customers and colleagues.

Customers
We take every measure possible to ensure our colleagues and customers are safe in our shops. After an initial investment of over £3m in 2020, we continued to invest in measures to keep our colleagues and customers safe. Our c.3,000 shops operated with strict procedures in place – including limited shop occupancy levels, signage and floor marking, machines and till dividers, and personnel protective equipment.

We continued our participation in the UK’s NHS Track & Trace system, identifying and isolating colleagues who may have been in contact with someone who had tested positive for Covid-19. We asked that colleagues who displayed symptoms, even minor, self-isolate immediately. We opened a hotline to help local teams deal with staff being unexpectedly off work.

We also worked to protect our customers who may be susceptible to at-risk online play due to the impacts and disruption of the pandemic. With the increase in safer betting at gaming messages, and player protection, we are delighted that the prevalence of at-risk play did not increase significantly throughout the pandemic, and we’re glad to play our part in that.

Colleagues
Shop closures across the UK and Ireland at the beginning of the 2021 meant that around 14,000 colleagues were placed on the UK Government’s furlough scheme. As in 2020, we topped up furlough payments to full salary to make sure our staff didn’t lose out as a result of these restrictions. We continued our significant investment in wellbeing initiatives to support colleagues whilst they were placed on furlough, working from home, or returning to the workplace post-lockdown.

Our Employee Assistance Programme provided staff with 24/7 support, including confidential counselling and legal advice. We also delivered 11 wellbeing campaigns across our global operations and trained 100 colleagues to become Mental Health First Aiders. To read more about our Well-Me strategy, please go to page 30.

Communities
In addition to customers and colleagues, we continued to do our part to continue to support our community partners and scale up our investments. We delivered on our commitment to invest 0.5% of GGY in the UK to research education and treatment of problem gambling. We are on track to increase this to 0.75% in 2022. In 2021, we extended our long-term partnership with SportsAid, increasing our total commitment to around £500,000 by 2024 and thereby supporting more up-and-coming athletes. Through Pitching in, our multi-million investment programme, we have continued promoting grassroots sports and delivering vital support to sport clubs and organisations. We also launched EnTrain, a global programme to increase access to, and diversity within, technology. To read more about these initiatives and the Entain Foundation, please go to pages 34 to 38.

24/7 support provided for staff through our Employee Assistance Programme
Our approach to protecting our customers, colleagues and communities can be summarised by the actions we’ve taken as part of the Betting and Gaming Council’s 10-pledge Covid action plan:

<table>
<thead>
<tr>
<th>Pledges</th>
<th>Our actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Increase safer betting and gaming messages across all sites and direct to all customers.</td>
<td>We increased responsible betting and gaming messaging on our homepage and throughout all sites, with a new page providing dedicated advice on keeping betting sensible and enjoyable during the crisis. Our gaming brands also ran multi-channel advertising and marketing campaigns to promote responsible betting and gaming to our customers while they enjoy time on our sites.</td>
</tr>
<tr>
<td>2. Step up interventions if customers increase time and spend beyond normal pre-crisis patterns.</td>
<td>We took our player protection interventions a step further, introducing additional safeguarding measures to ensure that we can rigorously monitor and protect anyone who may be vulnerable at this time. This includes the introduction of two new Markers of Protection indicators to our safer betting and gaming algorithm, to factor in the evolving betting and gaming behaviour caused by the pandemic, enabling the identification of potentially problematic betting and gaming behaviour at an earlier stage.</td>
</tr>
<tr>
<td>3. Actively promote deposit limits</td>
<td>In addition to promoting deposit limits as part of our safer betting and gaming promotion, we introduced a new maximum stakes tool across our slots brand.</td>
</tr>
<tr>
<td>4. Take action to ensure appropriate and responsible advertising, including monitoring volume of placements.</td>
<td>We adopted the Betting and Gaming Council’s voluntary ban on all UK broadcast gaming advertising, and its replacement with responsible betting and gaming messaging during the lockdown period.</td>
</tr>
<tr>
<td>5. Report all illegal, rogue advertising from black market online operators.</td>
<td>We continued to work with local enforcement agencies if we detect these issues, and encouraged colleagues to speak up if they spot anything that breaches our employee Code of Conduct.</td>
</tr>
<tr>
<td>6. Enforce a one-strike-and-you’re-out policy where affiliates breach pledges.</td>
<td>We implemented specific guidance and restrictions to all affiliates, preventing them from referencing the pandemic or encouraging excessive play due to boredom or isolation. This advice includes a specific blacklist of banned terms.</td>
</tr>
<tr>
<td>7. Signpost help to GAMCARE and the National Gambling Helpline and GamStop for self-exclusion.</td>
<td>We continued to promote GAMBAN throughout 2021.</td>
</tr>
<tr>
<td>8. Ensure continued funding for Research Education and Treatment (“RET”).</td>
<td>In 2021, we increased our UK Gross Gaming Yield (“GGY”) that is contributed to organisations working on the Research, Education and Treatment (“RET”) to 0.5%.</td>
</tr>
<tr>
<td>9. Provide welfare checks and wellbeing help for staff.</td>
<td>Due to the pandemic, we brought forward our delivery of Well-Me, Entain’s colleague wellbeing strategy, to provide additional support for our staff. This is outlined on page 30.</td>
</tr>
<tr>
<td>10. Support the UK government’s ‘National Effort’ with volunteers and facilities.</td>
<td>All stores implemented the NHS Track and Trace procedures.</td>
</tr>
</tbody>
</table>
Investing in people and communities

One of the key pillars of our Sustainability Charter is to continue investing in our people and communities. Our people are central to everything we do, so our focus is on recruiting, developing, and nurturing top talents from diverse backgrounds. We have the ambition to play a leadership role in limiting global warming to no more than 1.5°C and we have pledged to be Net Zero by no later than 2035. We also contribute to the wider communities in which we operate, supporting impactful organisations through the Entain Foundation.

**Best place to work**

**Everyone’s in the Game: Diversity and Inclusion at Entain**

Our vision is to create a best place to work where our colleagues feel valued, respected, and engaged. We want to revolutionise the betting and gaming industry and become the technology employer of choice for all talented people regardless of who they are.

2021 was the final year of the Everyone’s in the Game strategy. During this time, we started building a more intersectional and localised approach to diversity and inclusion. We are expanding our focus beyond gender equality, as well as ensuring our interventions are tailored to the context in which our colleagues live. We launched an Inclusion Ambassadors programme – Entain Nationals – and recruited 30 ambassadors across our global footprint. Those colleagues help us to better understand local challenges and to adapt and embed our programmes in each office.

We invested in educating Entain’s senior leaders on the importance of diversity & inclusion. Our Inclusion Team engaged with each Executive Committee (“ExCo”) member and their direct reports, presenting the diversity demographics of their team and helping them create tailored action plans for all business areas. We started reaching to our wider colleague-base with Global Inclusion Learning, a new interactive and immersive training delivered by 50 facilitators across the business. Based on real-life testimonials from our colleagues, the course discusses how to be more inclusive in day-to-day business interactions and to challenge negative behaviours. Our aim is for all our people to have completed the programme by the end of 2022.

We also broadened our inclusion partnerships by teaming up with global organisations. On International Women’s Day, we announced our collaboration with Girls who Code, donating $250,000 through the Entain Foundation to their work on encouraging more young girls of diverse backgrounds to study technology. In November, we launched our new multi-million pound global initiative called EnTrain. Our goal is to positively impact the lives of one million people by 2030 by enabling access to technology and changing the diversity within technology. To read more about these partnerships, please see page 37.

Over the past year, we have seen improvements across many of our DE&I metrics. Our Board is now 40% female which exceeds the target of 33% set out by the Hampton-Alexander review, and we have seen an increase in the proportion of women in technical roles. There has also been an increase in the proportion of employees that identify as from an ethnic minority background – although this data is based on a small sample size and is not currently available globally.

We have, however, seen a reduction in the proportion of our global colleague base who are female. We have identified key areas of the business that are driving this change despite improvements in the gender diversity of some teams, such as trading and customer services. For example, the number of colleagues in our Retail business has reduced over the past two years – a segment of the business that typically has a strong gender balance at 54% female in 2021. There has also been significant growth in specific geographies where there remains an ongoing challenge to recruit diverse talent. Addressing these challenges remains a focus for the Group, and we’re confident that over time the DE&I initiatives outlined in this section will start to drive positive trends across our key metrics.

Recognising our ambition and that there is still much to do, 2022 will see us launching the next iteration of our Diversity & Inclusion Strategy. We will deliver a six-month Reverse Mentoring programme to help our leaders stay in touch with colleagues and understand the lived experience of different groups. We are partnering with Global Gaming Women and the All-In Diversity Project to create ‘Lean In’ circles across Entain and connect our women across the globe with each other and other women within the broader technology and entertainment sectors.

We will continue improving our talent attraction, selection, and development processes to remove bias and improve representation, using well-tested methods such as diverse candidate slates and interview panels, as well as gender neutralisation and bias removal in job adverts. In 2021, we worked with Textio to apply their augmented writing platform across our Careers site and job descriptions. Textio provides guidance to reduce unconscious bias in communications.

We will also be investing in the creation of employee resource groups who will help us to better engage and advocate for minority groups at Entain. Additionally, we are expanding our education and awareness-building efforts to cover topics including allyship and use of inclusive language to set the foundations of creating a psychologically safe culture at Entain. We will also work to improve our diversity data collection with a new global self-declaration campaign, encouraging our colleagues to disclose demographics beyond gender on our internal people management system.
In the past three years, we have made improvements across our gender diversity at senior leadership level and across the business. We are now moving towards a more holistic approach to diversity, creating a workplace where everyone belongs and where access to opportunities is equal regardless of who you are.”

Sophie Hawley
Head of Diversity, Inclusion, & Equality

Our employees by countries

<table>
<thead>
<tr>
<th>Country</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Italy</td>
<td>2%</td>
<td>2%</td>
<td>7%</td>
</tr>
<tr>
<td>Philippines</td>
<td>4%</td>
<td>3%</td>
<td>58%</td>
</tr>
<tr>
<td>UK</td>
<td>14%</td>
<td>14%</td>
<td>3%</td>
</tr>
<tr>
<td>USA</td>
<td>1%</td>
<td>1%</td>
<td>4%</td>
</tr>
<tr>
<td>Other</td>
<td>3%</td>
<td>3%</td>
<td>4%</td>
</tr>
</tbody>
</table>

1. Data for 2019 and 2020 has been restated due to the merging of HR systems and the harmonisation of the definition of part-time employees between these systems.
2. Data covers all UK colleagues. Data is based on a snapshot date of 5 April for the year stated, as per the requirements of the UK’s Gender Pay Gap Reporting.
3. Technical colleagues are those employees that roll up to our Chief Technology Officer based on our Business Process Flow Manager.
4. Revenue-generating functions include our digital and retail/stadia functions.
5. This data was based on a sample of 54% of UK-based Entain employees in 2021 that have provided us with their ethnicity information. To prevent us from over- or understating the ethnic diversity of our employees, we report this data in two ways. We report on both the percentage of the sample that identify as being from ethnic minority backgrounds, as well as the number of those confirmed to be identifying as from an ethnic minority background as a proportion of all UK employees.
6. Data covers 98% of employees.
Well-Me: Wellbeing at Entain

The delivery of our Well-Me strategy went from strength-to-strength in 2021, as we further embedded wellbeing in every aspect of the employee lifecycle, from recruitment and onboarding to rewards and development. Our Global Wellbeing Network expanded across our offices to 13 wellbeing leads, who are helping us to shape our global wellbeing strategy and adapt it to local contexts.

In the past months, we continued to focus on supporting our colleagues through the pandemic. We have offered Well-Me booster sessions twice a week, alternating between yoga and meditation, and provided an interactive toolkit with resources to help our people adjust to returning to the workplace post lockdown. Throughout the year we continued the roll-out of our Mental Health First Aid (“MHFA”) programme, having recruited and trained over 100 colleagues globally to act as the first point of contact for people with mental health issues. Launched in 2020, our Employee Assistance Programme (“EAP”) remains a major source of support for our colleagues, with 8% of utilisation (a high take-up rate when compared to similar sized companies). We also delivered 11 global campaigns on a variety of wellbeing topics, achieving 130,000 views and interactions globally, a 35% increase in engagement from 2020.

As part of our broader response to Covid-19, we launched the Future of the Office – a strategic review of our working practices, exploring how we can use experience of how office-based colleagues adapted during lockdowns to benefit both our business and our people. We have adopted greater flexibility in our colleagues’ ability to work within the office or from home. We are also looking at how we can radically change our physical locations to create more inspiring and flexible workspaces, while increasing the use of existing buildings and maximising sustainability. As a first step, in April 2022, we opened a reimagined and renovated office in Stratford, London, where we provide a radically more creative and flexible workspace. Through these developments, we want to deliver a more personalised office experience which we believe will help us to attract and retain the best talent.

Also, later this year, we will partner with Robertson Cooper to undertake a Global Wellbeing Survey. This in-depth assessment will help us to better understand the root causes of mental health risks at Entain and to tailor future interventions in different areas of the business. We will also focus on our ‘frontline’ people who are providing support to colleagues and customers and are at greater risk of mental health issues, developing an end-to-end process to assist them in their roles.

130,000 views and interactions from our 11 global campaigns on a variety of wellbeing topics

Committed to colleague development

In 2021, we delivered important milestones in improving the way people learn and grow at Entain. At the beginning of the year, we introduced a new performance management strategy called Entain & Perform. Our ambition was to harmonise how our colleagues and teams are supported to set and meet their objectives. The strategy has been underpinned by learning camps for all our people managers and a new online tool where colleagues can capture their goals, learnings, career conversations, and reviews. In June, we also launched Learning Room, a global learning platform accessible to all our colleagues. Learning Room provides an online library with podcasts, articles, LinkedIn Learning courses, getAbstract book summaries, and other video content. The platform is a great example of self-led learning and has been nominated for the 2022 RAD Innovation Award.

We are also committed to apprenticeships as one of the most effective tools for social mobility. In 2021, we used 14% of our apprenticeship levy, supported 34 apprentices, and donated close to £350,000 as part of the Apprenticeship Levy Transfer Scheme. We are now strengthening our offer by introducing talent programmes with apprenticeships at their core. This will help us bolster the number of level-2 and level-3 apprentices in 2022.

I became a mental health first aider as I believe that everyone has a right to be heard and that we all need to be placing equal importance on our mental health as we do our physical health.”

Jo Bleasdale
Director of Internal Communications
Employee Remuneration & Reward

As well as supporting the development of our people, we are committed to providing a competitive rewards package compared to the relevant market for each employee across all levels. We are also committed to ensuring that colleagues can share in the success of the business. In early 2021, we launched an all-employee Sharesave plan. This plan is open to all employees in 14 countries, covering over 99% of employees globally. In addition, approximately 10,000 colleagues globally are included in our performance-based bonus plans. We also understand that reward goes beyond just salary. We provide access to our employee assistance programme and the Unmind platform to all employees globally. In our top-seven countries by colleague numbers (covering over 90% of employees globally), we offer at least one of the following non-salary benefits to all colleagues: Employer pension contributions, life cover, medical insurance, and income protection insurance. In other countries where we operate, we offer other non-salary benefits to match the expectations of the local employment market.

75% of our colleagues think Entain takes genuine interest in colleagues’ wellbeing.”

Entain 2021 Employee Survey

### Best place to work performance indicators

<table>
<thead>
<tr>
<th></th>
<th>2021</th>
<th>2020</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Satisfaction</td>
<td>60%</td>
<td>60%</td>
<td>60%</td>
</tr>
<tr>
<td>Central L&amp;D investment</td>
<td>£2.6m</td>
<td>£1.2m</td>
<td>n/a</td>
</tr>
<tr>
<td>Average hours per employee of</td>
<td>10.5</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>training and development</td>
<td>hours</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average amount spent per</td>
<td>£116</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>employee on training and</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>development</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average hours per manager of</td>
<td>38.5</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>training and development</td>
<td>hours</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average amount spent per</td>
<td>£577</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>manager on training and</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>development</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employee turnover – all</td>
<td>32%</td>
<td>26%</td>
<td>44%</td>
</tr>
<tr>
<td>Employee turnover – voluntary</td>
<td>25%</td>
<td>17%</td>
<td>33%</td>
</tr>
<tr>
<td>Whistleblowing incidents</td>
<td>29</td>
<td>34</td>
<td>34</td>
</tr>
<tr>
<td>reported and investigated</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employee accidents</td>
<td>117</td>
<td>137</td>
<td>179</td>
</tr>
<tr>
<td>Employee reportable incidents</td>
<td>5</td>
<td>4</td>
<td>8</td>
</tr>
<tr>
<td>Public accidents</td>
<td>9</td>
<td>31</td>
<td>24</td>
</tr>
<tr>
<td>Public reportable incidents</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Absenteeism rate</td>
<td>n/a</td>
<td>3.51%</td>
<td>2.16%</td>
</tr>
<tr>
<td>% of internal hires</td>
<td>n/a</td>
<td>4%</td>
<td>n/a</td>
</tr>
<tr>
<td>Employee engagement index (%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>of employees recommending</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Entain as a place to work)</td>
<td>74%</td>
<td>78%</td>
<td>74%</td>
</tr>
</tbody>
</table>

1. Data was not available at the time of reporting. We will report this data in our next ESG Report
2. Our 2020 employee engagement score is based on the results of the annual Your Voice Survey collected in February 2021. Entain could not run the Survey in 2020 due to the pandemic and our employee communication being focused on wellbeing. For consistency, the 2021 score is based on the results of our latest Your Voice survey, run in April 2022. This data has been restated after the release of the 2021 Annual Report. In our 2022 Annual Report we will update the results to reflect this change.

10,000 colleagues globally are included in our performance-based bonus plans
Data privacy and cybersecurity

Safeguarding our customer and corporate information remains a top priority for Entain, as our betting and gaming interactive entertainment offer continues to expand. Our commitment is reflected in a growing headcount and the robust governance procedures we have implemented. Our Chief Privacy Officer (who also holds the position of Group Data Protection Officer) and our Chief Security Officer provide regular updates to the Board and deliver deep dive sessions to our Executive Committee.

In 2021, we further embedded our Group-wide Data Protection and Data Retention policies, which apply to everyone working for Entain, including agency staff and contractors. 21,495 colleagues completed the annual mandatory GDPR training, and data owners have been identified across all departments to implement a four-stage data retention programme.

Data privacy is also built into the development of our safer betting and gaming initiatives, including in our new ARC™ programme. Whilst we use data-driven technologies such as Artificial Intelligence (“AI”) to create a safer environment for our players, we also have a duty to meet their privacy expectations and we’re working hard to strike that balance. Our data privacy experts are part of the ARC™ Steering Committee, through which they provide technical guidance to the safer betting and gaming and customer services teams. Over the year, these teams undertook a Data Privacy Impact Assessment (“DPIA”) programme, helping them to address privacy-by-design requirements and implement appropriate disclosure into privacy notices. We have also developed an AI and Data Ethics Charter, overseen by the ESG Committee, which defines our principles on the responsible use of AI to ensure it is used in the best interests of our customers and employees.

33% increase in cybersecurity team headcount

Our investment in cybersecurity continues to grow, with our team’s headcount increasing by 33% in 2021. We created a Cybersecurity Crisis Management Plan, which guides our response across all functions and business units in case of a critical cybersecurity breach. We’ve also initiated a new programme to reduce data privacy and cybersecurity risks in mergers & acquisitions (“M&A”), bolstering due diligence on M&A targets and speeding up the integration process. Businesses joining the Group must now align with our data privacy and cybersecurity requirements within six months of acquisition.

Human Rights & Supply Chain

We are committed to acting morally, honestly, openly and with integrity in everything we do. We firmly believe that a robust approach to protect human rights and prevent modern slavery is one way we can evidence this, as well as demonstrating our positive contribution to the communities in which we work and to society at large. We have identified that the two main potential risk areas for our business are in the recruitment and onboarding of staff and in our broader our supply chain.

In 2021 we partnered with Unseen, a UK-based charity fighting modern slavery, to strengthen our procurement processes and policies. Unseen helped us revise our Supplier Code of Conduct, providing greater emphasis on human rights standards within it. Every supplier must now approve the updated Code and share their anti-bribery and corruption policy before they can start doing business with us. Unseen also helped us to upskill our procurement, HR, and property colleagues, delivering bespoke, in-depth training courses on modern slavery. This was rolled out to all staff with a mandatory online training, completed by 78% of colleagues in 2021.

In 2022, we will continue working with Unseen and implementing their recommendations. We will reinforce our supplier due diligence processes, with additional checks for high-risk suppliers at the onboarding stage and throughout the duration of the contract. We are also conducting a review of our supplier questionnaire to refine our supplier risk assessment and escalation process. Following this process, we expect to introduce more stringent environmental and social clauses to our standard Terms & Conditions.

In addition to protecting human rights, we are also working with our suppliers to understand and reduce emissions throughout our value chain. In 2021, we conducted a screening assessment of our scope 3 emissions with the Carbon Trust. We are now engaging with 15 suppliers that represent 44% of those emissions. To read more about environmental impact, please go to pages 39 to 41.

“Every supplier must now approve the updated Code and share their anti-bribery and corruption policy before they can start doing business with us.”
Contributing to the economies where we operate

The Group employs a significant number of people across c.3,000 retail outlets and offices in more than 20 territories. As such, our economic footprint is significant. In 2021, we paid £1.1bn in taxes and levies across our countries of operation. This comes in addition to the £579.1m we paid in employee wages and salaries.

£1.1bn paid in taxes and levies across our countries of operation

In January 2022, we announced the launch of Ennovate, our new global innovation hub. Through Ennovate we are investing up to £100m in innovation projects, start-up investments and collaborations with UK, European and global partners. Our first lab in London will open later in the first half of the year, with £40m specifically of investment allocated to pursue UK-based innovation initiatives. Ennovate reflects Entain’s ambition to be a global leader in interactive entertainment and provide great products and moments of excitement for customers. As the media, entertainment and gaming sectors converge, we are adapting to offer customers the richer experiences they now expect, with a greater variety of content, immersive experiences, personalisation, and social interaction which increase their enjoyment and engagement. Through Ennovate we are partnering with cutting-edge technology companies such as Verizon, BT, and Theta Labs, to develop groundbreaking experiences for customers in gaming and interactive entertainment.

<table>
<thead>
<tr>
<th>Economic contributions</th>
<th>2021</th>
<th>2020</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net gaming revenue (NGR)</td>
<td>£3,886.3m</td>
<td>£3,628.5m</td>
<td>£3,632.7m</td>
</tr>
<tr>
<td>Underlying EBITDA</td>
<td>£881.7m</td>
<td>£843.1m</td>
<td>£761.4m</td>
</tr>
<tr>
<td>Total tax paid</td>
<td>£1,055m</td>
<td>£962m</td>
<td>£927m</td>
</tr>
<tr>
<td>Employee wages and salaries</td>
<td>£579.1m</td>
<td>£524.0m</td>
<td>£671.2m</td>
</tr>
<tr>
<td>Payments to providers of capital (interest &amp; dividends)</td>
<td>£63.9m</td>
<td>£62.8m</td>
<td>£267.1m</td>
</tr>
</tbody>
</table>
Entain Foundation

We originally launched the Entain Foundation (“the Foundation”) in September 2019 to help deliver the Group’s ambition to take the lead on safer betting and gaming and support the communities in which we operate. In addition to the main global Foundation, we also operate the Entain Foundation US, a dedicated US-based not-for-profit. In November 2020, the Group and its renamed Entain Foundation, which now enjoys registered charitable status, committed to investing £100m to good causes over five years. Under the independent chairmanship of Ed Davis CBE, the work of the Foundation supports the Group’s pioneering Sustainability Charter and wider ESG initiatives and plays an integral role in delivering against the Charter’s pillars of People and Communities, and Responsibility. The Foundation’s key areas of focus are safer betting and gaming, grassroots sports, diversity in technology and projects with a clear link to the communities where we operate.

In November 2021 we published our first Social Impact Report which explores the positive outcomes that we’re supporting through our contributions to partner organisations. While social impact is covered in our Annual Report and ESG reporting we felt it important to dedicate a standalone report to go into more detail about our work and impact. The primary focus of the report was the work that we’re enabling through partner organisations via charitable contributions and community investments.

How our social impact focus supports the Entain Sustainability Charter

- Only operate in regulated markets by 2023.
- Taking the lead on responsible betting and gaming.
- Best-in-class standards of corporate governance.
- Creating the best place to work, net-zero emissions by 2035, and support the communities where we operate.

Why it matters

- Safer betting and gaming
  - We support partner organisations that are engaged in research, education and treatment of problem gambling to bolster our internal Changing for the Better safer betting and gaming strategy.

- Grassroots, women’s and disability sports
  - Sports and sports betting are what we do. We give back by supporting the next crop of athletes, and work with organisations that are making sport inclusive to bring everyone into the game.

- Diversity in technology
  - As a technology company at heart, we are supporting organisations that are working with young people that may currently be underrepresented in the tech talent pool. Promoting tech careers and ensuring that the future talent pipeline is inclusive, making sure that Everyone’s in the Game.

- Projects in the communities where we operate
  - Our operations are truly global – embedded in communities in more than 15 countries.
Focus on safer betting and gaming

As noted above, within our seven principles of safer betting and gaming (see pages 11 to 20), the Foundation’s top priority is to further our promotion of safer betting and gaming. We do this through our contributions to partner organisations that support the delivery of the Group’s Changing for the Bettor safer betting and gaming strategy. Our work with our partner organisations supports this strategy across three key focus areas outlined above.

As part of our operations in the UK, in 2021 we contributed 0.5% of our Gross Gaming Yield (“GGY”) to support Research, Education and Treatment (“RET”) of problem gambling, this will rise to 0.75% in 2022. This funding is provided directly to GambleAware – a wholly independent grant-making charity that has a framework agreement amongst the industry to deliver the National Strategy to Reduce Gambling Harms.

In addition to these contributions, we work with a range of organisations that are leading on groundbreaking safer betting and gaming initiatives and research. We also leverage the expertise of our academic partners to ensure our own player protection culture, processes and decisions are informed by scientific research and lived experience.

In the US, as an increasing number of states launch regulated betting markets, we are also scaling up our level of support of safer gambling organisations to ensure that the correct support processes and pathways are established in these new and growing markets.
Promoting grassroots sport

As a business Entain is closely linked to the world of sport, and we believe an important way we can make impactful contribution is by investing at the grassroots level. The Foundation currently supports two major projects in the UK as well initiatives in Greece and Colombia. In 2022, we will be expanding this support to projects internationally.

Pitching In

Via Pitching In, our the multi-million-pound, multi-year, investment programme, the Foundation is partnered with the 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 leagues pyramid. The Trident Leagues, which trace their roots back to the nineteenth century, are at the heart of the national game, with 245 clubs and 15,000 players registered across the three leagues in many villages, towns and cities of England and Wales. Under the Pitching In banner – avoiding any promotion of our betting brands – Entain not only supports running of the Trident Leagues, but has also established the Trident Community Fund, which enables clubs to receive funding to run community engagement projects.

In 2022 a key focus for the programme is to facilitate and encourage community volunteers to do some pitching in of their own and contribute their time and effort. The Pitching In Volunteer Hub was launched in May 20022, providing a national framework to connect volunteers with their local club. The scheme will also encourage UK-based Entain colleagues to connect with their local clubs to further strengthen community ties.

15,000 players registered across the three leagues

Cheyanne Evans-Gray

Cheyanne Evans-Gray, a 22-year-old sprinter from Croydon, is one of the UK’s emerging athletic stars who has received funding from the Entain SportsAid partnership to help cover training, travel, and equipment, as well as mentoring by Olympians and Paralympians.

She returned to athletics aged 20, having taken several breaks from sprinting growing up, and broke a 13-year British Universities and Colleges Sports (BUCS) record in February when she stormed to indoor 60m victory in 7.28 seconds. Cheyanne will compete in the World Championships in 2022.

It’s a bit surreal seeing my name there [on SportsAid’s alumni] but it’s a special feeling. It feels like I’m mingling among the next set of greats.”

SportsAid

Entain has been partnered with SportsAid since 2018. SportsAid is the only national charity in the UK of its kind, helping young British athletes aspiring to be the country’s next Olympic, Paralympic, Commonwealth and world champions. Through the partnership Entain supports over 50 athletes each year by providing them with a financial award to help towards training, equipment and competition costs, as well as personal development training.

In 2021 we extended our long-term strategic partnership with SportsAid through to the Paris 2024 Olympic and Paralympic Games, doubling the financial backing made thus far and increasing our total commitment to around £500,000 by 2024, thereby ensuring more up-and-coming athletes benefit from the programme.

SportsAid also provides access to a variety of online workshops for athletes and their parents, online access to Olympians and Paralympians, and attendance at the House of Commons (where MPs meet athletes). These athletes are Great Britain’s brightest sporting prospects. They are nominated to SportsAid by the national governing bodies of more than 60 sports. SportsAid found that 61% (or 242 athletes) of those selected to represent Team GB at the Tokyo 2020 Olympic Games have received financial support and recognition from the charity during their careers.
Promoting diversity in technology

In November 2021, we launched EnTrain, a global programme to promote increased access to, and diversity within, technology. We have set the ambitious target for EnTrain to positively impact the lives of one million people around the world – either directly or through their families and dependants – by 2030.

As new and future generations face an increasingly digital world, the opportunity to level the playing field by diversifying human capital, reorienting, and reskilling the workforce has never been more pressing. As of July 2021, over 40% of the world’s population did not have access to the internet, which, if not addressed, could lead to a digital skills gap that results in a loss of opportunity estimated to be worth $11.5trn by 2028. As a company that develops cutting-edge technology, we’re determined to use our position to provide opportunities that will help to address this picture. The EnTrain programme is comprised of four core initiatives:

- **Entain Academy**: Supplying transformative tech training for the next generation.
- **Entain Scholarships**: Providing the platform for a diverse selection of candidates to become digital pioneers.
- **Entain Apprenticeships**: Expanding internal and external apprenticeship schemes with new and existing partners. Enabling our apprenticeship partners to provide technology courses for people in developing countries.
- **Entain Partnerships**: Building on our existing partnerships with organisations including Girls Who Code and Chance for Childhood and forming new collaborations with charities and non-profit organisations to improve diversity and increase access to technology for educational purposes.

Two organisations that Entain has worked with under our EnTrain initiative are Girls Who Code and the Tech Girls Movement Foundation.

Girls Who Code

Girls Who Code is an international non-profit organisation working to close the gender gap in technology and change the image of what a programmer looks like and does. With their initiatives, Girls Who Code are leading the movement to inspire, educate, and equip young women with the computing skills to pursue 21st century opportunities. In March 2021, we announced that we are providing $250,000 of funding to the organisation to expand its global pipeline of programmes to spark girls’ interest in technology. This pipeline includes free coding clubs, at home modules, virtual mentoring, panels and workshops as well as career fairs. Through these programmes, Girls Who Code has reached more than 300,000 young women globally and has nearly 90,000 college-aged alumni, who are majoring in Computer Science and related fields. Alumni are 15 times more likely to study such degrees, when compared to the US average for female enrolments. Over half of the girls served by Girls Who Code are from historically under-represented groups.

$250,000 of funding provided to expand Girls Who Code global pipeline of programmes to spark girls’ interest in technology

The Tech Girls Movement Foundation

The Tech Girls Movement Foundation was founded in Queensland, Australia in 2014 with the aim of actively challenging gender stereotypes that limit girls’ participation in Science, Technology, Engineering, and Mathematics (“STEM”) subjects. Their vision is to create a society in which girls confidently lead in STEM entrepreneurship and contribute to their community and the economy. Through support from the Entain Foundation, Tech Girls Movement Foundation was able to provide free competition places for girls who faced financial barriers to participating.
Supporting the communities
where we operate

Our operations are truly global – embedded in communities in over 15 countries. Through the Foundation, we support community organisations that are having an impact on the ground. Below we showcase the work of some of the organisations that we support.

Chance for Childhood

Chance for Childhood is an award-winning charity working in Africa to support the most vulnerable children, such as street connected children, disabled children, children affected by conflict or kids in prison. The charity believes the only way to break the vicious cycle of poverty and exclusion is through an approach tailored to the unique needs of each child.

Through support from the Entain Foundation, Chance for Children supported 714 marginalised women, children and families through four key programmes:

- **Changing the first 1,000 days for children in Ghana** by supporting 600 out-of-school street-connected children in Accra to access and thrive in early childhood education
- **Enabling children affected by conflict in the Democratic Republic of Congo** to access education, with 452 children expected to be re-integrated back into school in 2021.
- **Providing critical legal support to children and women in Northern Uganda**, where refugees who have fled war end up committing crimes just to survive. 75 children and 8 women refugees have received support through legal aid and psycho-social support, with preventative support provided to an additional 23 children and 108 women who are at risk of committing similar crimes.
- **Changing lives for children with disabilities in Rwanda**, with 48 families supported through the parents’ support groups and pig farming initiatives. In Rwanda there still exists deep rooted discrimination towards children with disabilities, who are often subject to stigma, abuse, exploitation and neglect, and are at high risk of being excluded from early care and education. This stigma, coupled with a lack of education on disabilities, means that parents often don’t know how to communicate with their child, leading to a life of loneliness and isolation.

The Entain Foundation is also helping to break through this loneliness by providing essential support to parents through Parent Support Groups that equip them with the knowledge to support their child’s development, wellbeing, and learning. The Group also provides parents with a space to share their experiences and learn from each other. Overall, Entain’s support has helped establish three new Parent Support Groups, benefiting 48 families in total.

The Ladbrokes Coral Trust

The Ladbrokes Coral Trust (LCT) was first established in 2003. LCT uses the Group’s network of Ladbrokes and Coral retail betting shops to run a variety of fundraising initiatives which provide funding for UK-registered charities across the three main areas of healthcare, education and community – three areas that are important to us and our customers. Since its inception, the LCT has raised almost £10 million for thousands of good causes across the UK. The LCT has two long term charitable partners: Children with Cancer UK – affiliated with Ladbrokes – and Prostate Cancer UK – affiliated with Coral.

Children with Cancer UK are the leading national children’s charity dedicated to the fight against childhood cancer. Their mission is to improve and support children and their families to live better with and after treatment. For example, they are investing in research to develop safer, kinder & more effective childhood cancer therapies, with fewer side effects. Children with Cancer is the official charity partner of the Group’s Ladbrokes brand. In 2019, the Group donated the shirt sponsorship rights it held for Charlton Athletic FC and AFC Sunderland to the charity.

£10m
raised by The Ladbrokes Coral Trust since its inception for thousands of good causes across the UK.
Reduced environmental impact

2021 has been pivotal in our efforts to address climate change and reduce our environmental impact, as we have committed to going net zero by 2035.

Our operational footprint

After achieving our GHG emissions reduction target in 2021, we are now focused on our new ‘near term’ science-based target (“SBT”). This is will be verified by the Science-based Targets initiative (“SBTi”) and will ensure that our pathway to decarbonization is in line with limiting global warming to 1.5 degrees, as per the Paris Agreement. Our target will be set for 2030, and we have included an interim target of a 42% reduction in our scope 1 and 2 emissions by 2027.

We are working to deliver our targets through a programme of activities:

- Continue to purchase 100% renewable electricity purchased across our retail estate and greyhound stadia in the UK and ROI, as well as a majority of our UK and ROI offices
- Encouraging our global operations to switch to renewable electricity in line with the RE100 criteria, where these mechanisms are available.
- Engagement activities through our Green Champions Network and Make Today Matter movement to empower our colleagues to help deliver on our target, through everyday interventions that will improve energy efficiency.
- We are also committed to improving energy efficiency in our rolling shop-refurbishment scheme, which includes refitting shops with energy efficient appliances, lighting, and heating.

Scope 1 and 2 GHG emissions

<table>
<thead>
<tr>
<th></th>
<th>2021 Total Scope 1 &amp; 2 Emissions (location-based):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>27,220</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2021 8,374 / 18,845</td>
</tr>
<tr>
<td></td>
<td>2020 7,461 / 21,497</td>
</tr>
<tr>
<td></td>
<td>2019 12,022 / 29,331</td>
</tr>
</tbody>
</table>

GHG Emissions Intensity

<table>
<thead>
<tr>
<th></th>
<th>2018-2021 Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>1.82</td>
</tr>
<tr>
<td>2019</td>
<td>1.68</td>
</tr>
<tr>
<td>2020</td>
<td>1.21</td>
</tr>
<tr>
<td>2021</td>
<td>1.08</td>
</tr>
</tbody>
</table>

Scope 1+2/employee 2018-2021 Target
Our scope 3 footprint

In 2021, we worked with the Carbon Trust to conduct a screening assessment of our scope 3 emissions. This outlined the scale of the emissions in our value chain, which makes up 96% of our total market-based value chain emissions. This figure is typical for global companies with a large supplier base. As our scope 3 emissions are over 40% of our overall emissions, our Science-based Target will also include a Scope 3 target. We will commit to reducing our scope 3 emissions by 42% by 2030.

Our screening assessment also found that 84% of our emissions were associated with purchased goods and services – the products and services that our suppliers provide us. In addition, we found that 44% of our emissions are associated with 15 major suppliers. As such, our reduction strategy involves engaging our key suppliers to explore how we can together reduce our carbon emissions. To do this, we have been aligning our approach to the Carbon Trust Supply Chain Standard, where we currently have Level 1 certification.

Given our growing digital presence, which has led to an increase in the scale of digital services that we procure, we have developed a process to engage our digital infrastructure providers to understand our footprint and sustainability credentials of our suppliers in this area. As such, we are taking the following actions to address our digital and data centre footprint:

- Sending data requests to our major providers to gather primary data on the emissions that are allocated to the services that we procure
- Understanding the sustainability credentials that our providers have in place (for example, renewable energy contracts or on-site generation).
- Engaging with providers to identify projects where we can reduce energy consumption in the way we procure services.

Our Scope 3 emissions

1. **Category 1b**
Purchased goods & services (non-product) 88%

2. **Category 3**
Fuel & energy related activities 2%

3. **Category 4**
Upstream transportation & distribution 4%

4. **Category 5**
Waste generated in operation 0%

5. **Category 6**
Business travel 1%

6. **Category 7**
Employee commuting 4%
Our pathway to net zero

In addition to setting a near-term Science-based target, we’re looking longer-term to our net-zero target by 2035. Our major priorities are to set ambitious targets and achieve deep reductions in our value chain emissions (including our own operations), which are described above. As we look to achieve the above, we understand that there is likely to be residual emissions that are unable to be abated from our value chain. For these emissions, we will invest in high-quality carbon removals that sequester carbon from the atmosphere.

We have already begun ramping up our investment in climate mitigation beyond our value chain through our partnership with Brynk. Brynk is an independent platform that supports tree planting and reforestation projects globally on our behalf. By the end of the first half of 2022, we will have planted one million trees in our Entain forest. By 2032, it is forecast that these trees will sequester 21,000 tonnes of CO₂e from the atmosphere and provide employment and training for local people as well as localised environmental and social benefits.

Whilst GHG emissions are our most significant environmental impact, we also measure and look for ways to reduce our waste and water consumption. In 2021, we continued to deploy our new recycling programme across our shops, which we plan to roll out fully as our retail estate reopens in 2021. In 2021, we recycled 56.9% of our waste across our retail estate.

Environmental KPIs, including Streamlined Energy and Carbon Report (SECR) data

<table>
<thead>
<tr>
<th>Category</th>
<th>2021</th>
<th>2020</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total energy consumption (kWh)</td>
<td>112,496,721</td>
<td>111,755,270</td>
<td>149,976,498</td>
</tr>
<tr>
<td>UK</td>
<td>87,971,719</td>
<td>92,776,583</td>
<td>123,723,097</td>
</tr>
<tr>
<td>Rest of the world (ROW)</td>
<td>24,525,002</td>
<td>18,978,687</td>
<td>26,253,400</td>
</tr>
<tr>
<td>Absolute direct emissions (scope 1) – (tCO₂e)</td>
<td>1,905</td>
<td>822</td>
<td>3,083</td>
</tr>
<tr>
<td>Absolute indirect emissions (scope 2, location-based) – (tCO₂e)</td>
<td>25,315</td>
<td>28,136</td>
<td>38,270</td>
</tr>
<tr>
<td>% of purchased electricity from renewable sources</td>
<td>70.9%</td>
<td>59.4%</td>
<td>4.6%</td>
</tr>
<tr>
<td>Absolute GHG emissions – direct and indirect: location based (tCO₂e)</td>
<td>27,220</td>
<td>28,958</td>
<td>41,353</td>
</tr>
<tr>
<td>UK</td>
<td>18,845</td>
<td>21,497</td>
<td>29,331</td>
</tr>
<tr>
<td>Rest of the world</td>
<td>8,374</td>
<td>7,461</td>
<td>12,022</td>
</tr>
<tr>
<td>Absolute GHG emissions intensity per employee (tCO₂e/headcount)</td>
<td>1.08</td>
<td>1.21</td>
<td>1.68</td>
</tr>
<tr>
<td>Total GHG emissions – direct and indirect: market based (tCO₂e)</td>
<td>12,090</td>
<td>15,065</td>
<td>39,295</td>
</tr>
<tr>
<td>UK</td>
<td>3,331</td>
<td>7,640</td>
<td>28,852</td>
</tr>
<tr>
<td>Rest of the world</td>
<td>8,759</td>
<td>7,425</td>
<td>10,443</td>
</tr>
<tr>
<td>Water withdrawal (cubic metres)</td>
<td>100,401</td>
<td>252,345</td>
<td>527,694</td>
</tr>
<tr>
<td>Waste generated (tonnes)</td>
<td>3,858</td>
<td>7,527</td>
<td>6,115</td>
</tr>
</tbody>
</table>

1. Data for 2021 differs from that reported in the 2021 Annual Report due to incomplete data at the time.
2. Data from previous years has been restated based on minor adjustments that arose as part of Entain’s GHG independent data validation by the Carbon Trust.
3. Coverage of energy consumption and emissions data is 100% for the UK, and 96.06% globally, by employee headcount. Global and ROW energy and emissions data is scaled up based on this coverage to estimate totals across global operations. This data includes energy consumption related to both scope 1 (company vehicles, gas, and fuel) and scope 2 emissions (purchased electricity).
4. Energy from renewable sources only includes electricity purchased that was actively sourced from renewables. All remaining electricity used by Entain is sourced from the local grids where we operate.
5. Emissions are calculated using the GHG Protocol Corporate Accounting and Reporting Standard. Consumption data has been converted to GHG emissions using 2021 BEIS emissions factors and 2021 IEA emissions factors for non-UK grid electricity. We have excluded fugitive emissions from refrigerants, as they have been deemed de minimis in previous years. Emissions reported above are calculated using the location-based method, using an operational control boundary.
6. All water withdrawn is sourced from municipal water supplies. Water data includes our operations in the following countries: Austria, Belgium, Bulgaria, Gibraltar, India, Israel, Philippines, UK, Uruguay. This makes up 88% of Entain’s global headcount. Note that this data is not scaled up to estimate the total global consumption but reported consistently for the operations where data is available.
7. Waste data is sourced from our operations in the UK. This makes up 64.4% of our overall headcount. These figures are not prorated to 100% coverage.
## ESG Targets and Objectives

<table>
<thead>
<tr>
<th>Target / objective</th>
<th>Status</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Exclusive focus on regulated markets</strong></td>
<td>Achieved</td>
<td>By the end of 2021, over 99% of our revenues were from domestically regulated markets, or those taking positive steps towards regulation in the short-term. We also increased the number of domestically regulated jurisdictions from 27 to 31.</td>
</tr>
<tr>
<td><strong>Best in class corporate governance</strong></td>
<td>On track</td>
<td>The Board membership now has a 60:40 male to female split, in line with the recommendations of the Hampton Alexander Review. Our attempts to appoint COO Sandeep Tiku to the Board were frustrated in 2021 by COVID-19 related restrictions. Subsequently Mr Tiku has accepted a new opportunity outside of the Group. Consequently the Nomination Committee is undertaking an active search to appoint a Director from an ethnically diverse background, which we hope to complete later this year.</td>
</tr>
<tr>
<td><strong>Review and enhance Modern Slavery Act Statement review</strong></td>
<td>On track</td>
<td>At the end of 2020, our Modern Slavery Working Group, which includes colleagues from Group Procurement, Human Resources, Internal Audit and Company Secretariat, was formed. The Working Group is responsible for producing the annual Modern Slavery Statement and aims to better the visibility of human rights issues, impacts and risks, and identify ways to eradicate adverse effects on human rights within the Entain plc group and extended supply chains. In 2021, the Working Group partnered with Unseen, one of the UK’s leading anti-slavery charities working towards ending modern slavery by empowering survivors, providing advice, and influencing society. Unseen assisted with reviewing our policies and procedures, provided a comprehensive gap analysis. In September 2021, we introduced mandatory training on the Modern Slavery Act 2015 to all colleagues across our business, and we will provide tailored training to specific functions within the Company, such as Procurement, Internal Audit and recruitment.</td>
</tr>
<tr>
<td><strong>Ensure compliance functions continue to be aligned with best practice</strong></td>
<td>On track</td>
<td>Additional staff and technical capabilities are being added to the Compliance and Regulatory teams to ensure they have the necessary resources to meet and/or exceed all of the Group’s obligations. Second line compliance testing has been bolstered with dedicated compliance monitoring teams and resources ensuring a more dynamic and proactive second line review process. The scope and monitoring plans for the teams will continue to be reviewed in line with the Group’s compliance obligations.</td>
</tr>
<tr>
<td><strong>Continuing to take the lead on safer betting and gaming</strong></td>
<td>On track</td>
<td>In 2021 we introduced a new safe betting and gaming metric to the Group Annual Bonus Plan, with 15% of bonus payments being tied to our independently assessed performance against the successful delivery of the Advanced Responsibility and Care programme. In 2022, in addition to the continuation of the 15% safer betting and gaming metric we are introducing a metric based on customer satisfaction using a Net Promoter Score, which will comprise a further 5% of the bonus assessments.</td>
</tr>
<tr>
<td>Tying remuneration to responsibility and customer satisfaction.</td>
<td>On track</td>
<td>Despite the coronavirus pandemic, we are still on track to invest 1% of GGY to RET this year. In 2021, we will contribute 0.5% of GGY to RET, equating to £12.5m.</td>
</tr>
<tr>
<td>Increasing the amount we contribute towards problem gambling research, education and treatment (RET) ten-fold gradually to 1% by 2022 against a 2018 baseline.</td>
<td>On track</td>
<td></td>
</tr>
<tr>
<td>Target / objective</td>
<td>Status</td>
<td>Commentary</td>
</tr>
<tr>
<td>-------------------</td>
<td>--------</td>
<td>------------</td>
</tr>
<tr>
<td>Continuing to take the lead on safer betting and gaming continued ...</td>
<td></td>
<td>As reported on pages 16 to 17, our support of EPIC continued despite the pandemic. In 2021, we supported and educated over 15,000 pupils via our problem gambling awareness sessions.</td>
</tr>
<tr>
<td>Pioneering new approaches to transparent reporting on safer betting and gaming, developing robust metrics in partnership with our peers.</td>
<td></td>
<td>We continue to expand our reporting on safer betting and gaming, with new KPIs associated with our ARC™ programme. In 2022, we will look to include further transparency via enhanced safer betting and gaming metrics.</td>
</tr>
<tr>
<td>Developing our partnership with Harvard Medical School to better understand and reduce the potential for problem gambling behaviour through rigorous research.</td>
<td></td>
<td>In its third year, this partnership continues to grow. We have incorporated some of the findings from the programme into our Advanced Responsibility and Care (“ARC”) programme, embedding the academic research into our player protection algorithms. To date the research teams have already submitted 11 papers for review and have an additional four papers in active development for submission to peer review.</td>
</tr>
</tbody>
</table>

| Investing in our people and communities | | |
| Invest £100m via the Entain Foundation over the next five years (from 2020). | | In 2021, we contributed £14.2m via the Entain Foundation to projects including safer betting and gaming initiatives, our Pitching In grass roots sports investment fund and Entain, our fund to promote diversity in and through technology. |
| Implementing the strategic partnership with SportsAid which will support both talented individuals and national sporting excellence programmes in the lead up to the Paris Olympics. | | Our partnership with Sports Aid continues to prosper. Through the partnership, helped 50 up-and coming sports stars across the country this year. |
| Embedding and broadening our initiatives to continuously strive to make Entain an inclusive employer of choice where people can succeed and progress in a meritocracy. | | We are ranked #1 in the All-in Diversity All-Index list – the industry benchmark for diversity and inclusion. There is also early evidence that our new employer brand is attracting 8% more female applicants. As our three-year Everyone’s in the Game strategy comes to a close in 2021, we will outline a new approach to maintain and build momentum in this area. |
| Delivery of Well-Me, a targeted three-year plan to enhance the physical and emotional wellbeing of all our colleagues. | | The delivery of our well-me strategy went from strength-to-strength in 2021, as we further embedded wellbeing in every aspect of the employee lifecycle, from recruitment and onboarding to rewards and development. Our Global Wellbeing Network expanded across our offices to 13 wellbeing leads, who are helping us to shape our global wellbeing strategy and adapt it to local contexts. |
| Reducing our GHG emissions (scope 1 and 2, location based) by 15% by 2021 on a per employee basis. | | We have achieved our 2021 target early, with a 33% reduction of GHG emissions per employee since 2018. To step up our ambition on climate action, we have committed to being net-zero by 2035. In 2022 we will formally set a Science-based Target, to be verified by the Science-based Targets Initiative. |
| Further streamlining our approach to supplier management, ensuring our value chain partners share our high social and environmental standards. | | Despite 2020 being a challenging year for supplier engagement, we published our Supplier Code of Conduct on our public website. We also made this part of our standard terms for doing business with Entain. This meant that all suppliers onboarded have read and understood our conditions of high social, ethical and environmental standards. In 2021, we will continue to revamp our supplier engagement and ESG risk management, as well as work with the Carbon Trust to engage key suppliers, helping them to reduce their GHG emissions. |
## SASB index

<table>
<thead>
<tr>
<th>Topic</th>
<th>Code</th>
<th>Accounting metric</th>
<th>Data/reference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Environmental Footprint</strong></td>
<td>SV-CA-130a.1</td>
<td>(1) Total energy consumed</td>
<td>Refer to page 41</td>
</tr>
<tr>
<td></td>
<td>(TC-SI-130a.1)</td>
<td>(2) Percentage grid electricity</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>(3) Percentage renewable</td>
<td></td>
</tr>
<tr>
<td></td>
<td>TC-SI-130a.2</td>
<td>(1) Total water withdrawn</td>
<td>(1) Refer to page 41</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(2) Total water consumed</td>
<td>(2) Not reported</td>
</tr>
<tr>
<td></td>
<td>TC-SI-130a.3</td>
<td>Discussion of the integration of environmental considerations into strategic planning for data centre needs</td>
<td>Refer to page 40</td>
</tr>
<tr>
<td><strong>Responsible Gaming</strong></td>
<td>SV-CA-260a.1</td>
<td>Percentage of gaming facilities that implement the Responsible Gambling Index</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Not applicable. The Responsible Gambling Index and NCPG Standards mainly focusses on US markets, where Entain only operates through our joint venture with BetMGM. Entain is a platinum member of the NCPG. Entain complies with the stringent GC regulations and BGC standards. In early 2022, Entain was awarded the Advance Safer Gambling Standard by GamCare for evidencing the highest standards of player protection in our UK online and land-based activities. The Group is the largest operator to be awarded the highest level of accreditation (Advanced Level 3) for its online activities, and Advanced Level 2 for its land-based activities.</td>
</tr>
<tr>
<td></td>
<td>SV-CA-260a.2</td>
<td>Percentage of online gaming operations that implement the National Council on Problem Gambling (NCPG) Internet Responsible Gambling Standards</td>
<td></td>
</tr>
<tr>
<td><strong>Smoke-free Casinos</strong></td>
<td>SV-CA-320a.1</td>
<td>Percentage of gaming floor where smoking is allowed</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SV-CA-320a.2</td>
<td>Percentage of gaming staff who work in areas where smoking is allowed</td>
<td>Not applicable. Entain does not operate casinos, and smoking is not permitted in our betting and gaming shops in the UK and ROI</td>
</tr>
<tr>
<td><strong>Internal Controls on Money Laundering</strong></td>
<td>SV-CA-510a.1</td>
<td>Description of anti-money laundering policies and practices</td>
<td>Our Approach to AML and CTF [<a href="https://entaingroup.com/sustainability/aml-statement/">https://entaingroup.com/sustainability/aml-statement/</a>]</td>
</tr>
<tr>
<td></td>
<td>SV-CA-510a.2</td>
<td>Total amount of monetary losses as a result of legal proceedings associated with money laundering</td>
<td>Entain had no monetary losses as a result of AML legal proceedings in 2021.</td>
</tr>
<tr>
<td>Topic</td>
<td>Code</td>
<td>Accounting metric</td>
<td>Data/reference</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>------------</td>
<td>-----------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Data Privacy &amp; Freedom of Expression</td>
<td>TC-SI-220a.1</td>
<td>Description of policies and practices relating to behavioural advertising and user privacy</td>
<td>Refer to page 32</td>
</tr>
<tr>
<td></td>
<td>TC-SI-220a.2</td>
<td>Number of users whose information is used for secondary purposes</td>
<td>We do not collect metrics on secondary purposes. Our position is that we use the data in a transparent way obtaining user consent or applying other lawful processing conditions such as legitimate interest for each collection purpose (including marketing, sharing with third parties, etc)</td>
</tr>
<tr>
<td></td>
<td>TC-SI-220a.3</td>
<td>Total amount of monetary losses as a result of legal proceedings associated with user privacy</td>
<td>Entain had no monetary losses as a result of user privacy legal proceedings in 2021</td>
</tr>
<tr>
<td></td>
<td>TC-SI-220a.4</td>
<td>(1) Number of law enforcement requests for user information</td>
<td>(1) 500 (UK only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(2) Number of users whose information was requested</td>
<td>(2) Not available</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(3) Percentage resulting in disclosure</td>
<td>(3) Not available</td>
</tr>
<tr>
<td></td>
<td>TC-SI-220a.4</td>
<td>List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring</td>
<td>Not reported</td>
</tr>
<tr>
<td>Data security</td>
<td>TC-SI-230a.1</td>
<td>(1) Number of data breaches</td>
<td>(1) 11 (2021)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(2) Percentage involving personally identifiable information (PII)</td>
<td>(2) 0 (2021)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(3) Number of users affected</td>
<td>(3) 0 (2021)</td>
</tr>
<tr>
<td></td>
<td>TC-SI-230a.2</td>
<td>Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards</td>
<td>See also page 81 of our 2021 Annual Report</td>
</tr>
<tr>
<td>Recruiting &amp; Managing a Global, Diverse Workforce</td>
<td>TC-SI-330a.1</td>
<td>Percentage of employees that are</td>
<td>Not reported</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(1) Foreign nationals</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>(2) Located offshore</td>
<td></td>
</tr>
<tr>
<td></td>
<td>TC-SI-330a.2</td>
<td>Employee engagement as a percentage</td>
<td>Refer to page 31</td>
</tr>
<tr>
<td></td>
<td>TC-SI-330a.3</td>
<td>Percentage of gender and racial/ethnic group representation for</td>
<td>Refer to page 31</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(1) management</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>(2) technical staff</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>(3) all other employees</td>
<td></td>
</tr>
<tr>
<td>Intellectual Property Protection &amp; Competitive Behaviour</td>
<td>TC-SI-520a.1</td>
<td>Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behaviour regulations</td>
<td>Entain had no monetary losses as a result of anti-competitive behaviour proceedings in 2021</td>
</tr>
<tr>
<td>Managing Systemic Risks from Technology Disruptions</td>
<td>TC-SI-550a.1</td>
<td>Number of (1) performance issues (2) service disruptions (3) total customer downtime</td>
<td>(1) Not reported (2) Not reported (3) 0.07%. Our platform availability was 99.93% in 2020, as reported on our website</td>
</tr>
<tr>
<td></td>
<td>TC-SI-550a.2</td>
<td>Description of business continuity risks related to disruptions of operations</td>
<td>Read how we mitigate the risk of technological failure in our Annual Report, page 82</td>
</tr>
</tbody>
</table>
About this report

- This is the fifth consecutive Environmental Social and Governance ("ESG") Report for Entain plc, (previously GVC Holdings PLC).
- This report supplements the ESG content in the Entain 2021 Annual Report.
- This report has not been through an external assurance process. However, data is independently validated by sustainability consultancy Carnstone Partners Limited (note that this does not constitute any form of external assurance).
- As in previous years, the Board ESG Committee – the highest ESG body at Entain – has reviewed and approved this Report.
- As such, Entain believes that this Report fairly reflects our Global ESG Performance and Efforts.
- The data and narrative of this report covers all of the Group’s continuing operations globally, unless stated otherwise.
- The reporting period for KPIs in this report aligns with the Entain financial year, which ran from 1st January 2021 to 31st December 2021. Unless stated otherwise, People KPIs refer to a snapshot date of 31st December 2021. Narrative information covers activities that have taken place from the start of 2021 up until May 2022.
- We align to external standards by reporting against the Sustainability Accounting Standards Board ("SASB") for both the Casinos and Gaming (primary) and the Software & IT Sectors (secondary). We also reported against the Task Force for Climate-related Financial Disclosures ("TCFD") recommendations in our Annual Report. This is supplemented by reporting other issues and metrics based on our own materiality assessment, as well as legal requirements.
- We welcome feedback and suggestions on the contents of this report, or any aspect of our ESG and sustainability programmes. For information on how to get in touch, please visit https://entaingroup.com/contact-us/

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DQ Advocates

Principal UK Bankers
Barclays Bank PLC
The Royal Bank of Scotland plc

Future trading updates and financial calendar

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>7 July</td>
<td>Post close trading update</td>
</tr>
<tr>
<td>11 August</td>
<td>Interim results</td>
</tr>
<tr>
<td>13 October</td>
<td>Q3 trading update</td>
</tr>
</tbody>
</table>