



External Marketing Policy Statement

Version 1.0 June 2022

Confidentiality Statement

All information contained in the document is Internal. It does not contain Confidential information and can be shared with relevant external third parties.



Contents

Introduction - Marketing and Entain.....	2
External Marketing Policy Statement Scope.....	3
Guiding Principles	3
Roles and Responsibilities	4
Training Our People	6
Changing for the Better	6



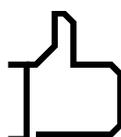
Introduction - Marketing and Entain

Entain, one of the world's largest listed gambling companies, is subject to a wide range of laws, standards, guidelines, and regulations.

In relation to marketing, regulations require operators to ensure that all marketing communications are legal, decent, honest, truthful, and socially responsible, ensuring that consumers are protected and all legal, regulatory and industry Codes of Practice requirements are upheld in all jurisdictions where Entain conducts marketing activity.

This policy statement sets out how we, as an organisation, have committed to operate marketing across all our businesses to uphold legal and compliance obligations and how employees are expected to market Entain products and services in a clear, transparent, and socially responsible manner, enabling customers to make informed decisions.

Entain is committed to ensuring that all forms of marketing will uphold both the letter and spirit of the relevant legislation, regulations and industry Codes of Practice.





External Marketing Policy Statement Scope

The Entain External Marketing Policy Statement applies to all marketing activity undertaken by all brands within Entain, regardless of jurisdiction in which the marketing activity is conducted. The full range of marketing channels used by Entain are detailed below.

TV, Radio, Press & PR	Sponsorship	Websites & Mobile Apps
Email, SMS, Push & Inbox	Retail Shops & Stadia	PPC, SEO and Programmatic
Affiliates, Ambassadors and Brand Representatives	Media Publishers & Marketing Agencies	Social Media Platforms

Guiding Principles

Socially responsible marketing and advertising forms one of the seven key pillars of Entain safer gambling strategy, Changing for the Better (CFTB). Entain is committed to ensuring that all marketing activity adheres to the following principles:

- Ensure that our marketing and promotional materials comply with all applicable laws, regulations, and Codes of Practice (as defined by the relevant jurisdiction).
- Promote safer gambling and uphold the CFTB Principles.
- Children, young persons, and vulnerable individuals are adequately safeguarded.
- Terms and conditions are clear, transparent, not misleading and are readily accessible to the customer.
- Content does not infringe third party intellectual property rights.
- Entain brand marketing does not feature on third party websites containing copyright infringing, age inappropriate, sexually explicit content, or content relating to illegal / criminal activities.
- Ensuring we comply with any local advertising codes, while adhering to the principles of the United Kingdom (UK) Advertising Standards Authority (ASA)'s mission



statement to be legal, decent, honest and truthful with our advertising in any jurisdiction in which we operate.

- Entain will not participate or employ disinformation campaigns against our competitors or gambling as a product.
- Ensure that our marketing and promotional materials are clearly distinguishable as such, with clear labelling in editorial contexts.
- Avoid exaggerated and unfounded claims about Entain's social and environmental impact.

European Gaming and Betting Association

The European Gaming and Betting Association's (EGBA) Code of Conduct¹ has been implemented to enhance consumer and minor protection through the promotion of responsible advertising measures for online gambling.

The Code applies, without prejudice, to the national laws of the UK and the EU/EEA countries where online gambling operators provide their services, as well as applicable EU legislation.

The Code is intended to be applicable in all EU, EEA countries and the UK. Signatory parties agree to comply with the measures included in the Code. The Code covers all Gambling marketing activities in all media platforms (including television, radio, social networks, and other online platforms), regardless of the technology used. All signatories commit to implement and uphold, in letter and in spirit, this Code of Conduct.²

Entain have committed to upholding the principles of this Code.

Roles and Responsibilities

The following roles are primarily involved in delivering Entain's Marketing Policy Statement.



Board and Supervising Functions

It is the responsibility of the Entain plc Board to oversee the organisation's compliance with all relevant regulations.

The high-level supervision function is executed via the Entain Board's Environmental Social and Governance (ESG) Committee, which ensures that the compliance management system is audited independently and that findings are properly addressed.

The Board ensures that Entain has effective controls and policies in place to address licensing requirements in each jurisdiction in which a Entain company holds a gambling licence.

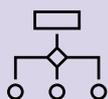
¹ <https://www.egba.eu/uploads/2020/04/200428-Code-of-Conduct-on-Responsible-Advertising-for-Online-Gambling.pdf>

² Code of Conduct on Responsible Advertising for Online Gambling Section 4 – Scope.



Chief Governance Officer

The Chief Governance Officer is a member of the Entain plc Board and oversees the compliance function for the Group.



Chief Executive Officer

The Group Chief Executive Officer is responsible for commercial functions and has appointed Managing Directors for both retail and digital departments to oversee marketing activity.



Compliance and Related Functions

The Compliance function is a department within the Legal & Compliance division. The function works closely with other operational teams to ensure that all forms of marketing comply with relevant regulations, industry Codes of Practice and safer gambling principles.

Both the Compliance and Legal functions work closely together to ensure that requirements are communicated effectively across the Group and to provide support for all marketing teams.



Employees

Employees are responsible for ensuring that all forms of marketing uphold Entain's commitment to promoting safer gambling and are delivered in a clear, transparent, and socially responsible manner.

Entain expects all employees to uphold and demonstrate our commitment to being a socially responsible operator with customer protection at the core of our business.



Internal Audit & Compliance Monitoring

The Internal Audit function acts as an internal supervision function and reviews the organisation's compliance with relevant regulations. Entain also employs dedicated Compliance Monitoring teams as a second line of defence risk model.

The Internal Audit department reviews the effectiveness of the Group's Safer Gambling and Compliance policies and procedures on a periodic basis as part of an annual plan.

Audit findings are communicated to the Board via the relevant subcommittee and actioned accordingly.



Training Our People

Entain has taken considerable steps to improve the compliance staff training programme and delivery methods across the Group.

A new compliance specific eLearning module focussing on socially responsible marketing was created and delivered to all relevant employees. Workshops have been conducted with marketing teams in 2021/2022 and a programme of additional engagement workshops will be devised as part of the 2022/2023 training plan.

Changing for the Better

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 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 activity and channels. The Policy is complemented by internal guidelines for each market where we operate, including examples of acceptable and unacceptable marketing behaviour.

We work with the industry via Trade Associations and directly to strengthen best practice for advertising and marketing, i.e. through codes of practice. This includes utilising our marketing budget and airtime for responsible gambling initiatives as well as other controls and mechanisms to ensure marketing material is appropriately age targeted.