

Σntain

Speak Out Policy (Whistleblowing)

Version 5.0 December 2021



Owner

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Author	Tanya Heath, Director of Internal Audit
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Statement

We take all allegations of malpractice and misconduct seriously, and will deal with individuals' concerns confidentially and sensitively. We do our best to resolve all work-related issues fairly and quickly.

If you see behaviour that might be illegal, unethical or that breaches our code of conduct, please speak out and let us know as soon as possible. We can only investigate a possible breach if we know about it. Some examples of the behaviour that you should report is:

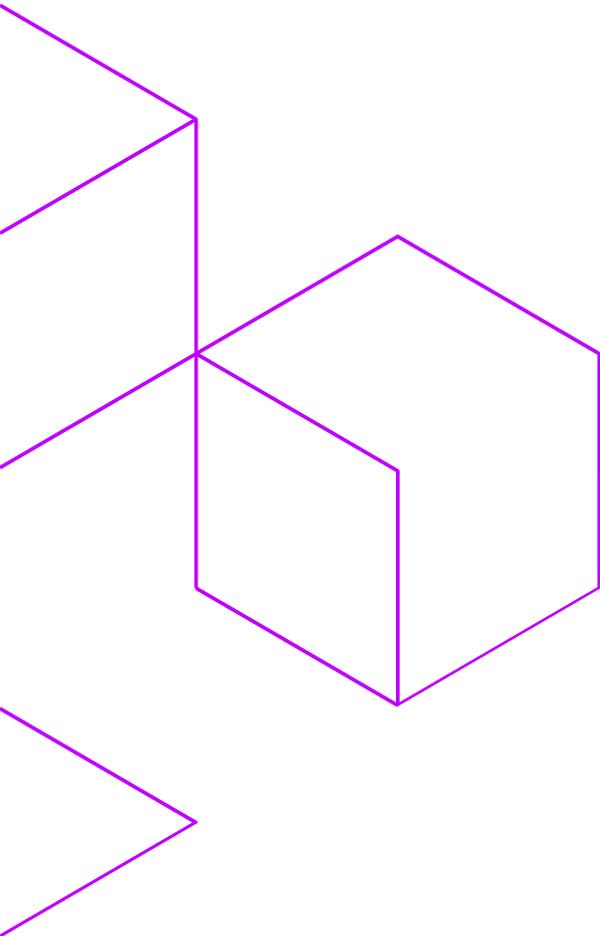
- Non-compliance with our policies or code of conduct, including incidents where any colleague is treated with a lack of equality and respect
- Violation of laws or regulations, including matters such as data protection or industry-specific rules such as gambling or AML regulations
- Abuses of position for personal gain or the benefit of friends and family, including hospitality, gifts or other incentives
- Fraud or theft of company money or assets
- Modern slavery issues including paying fees to obtain jobs at Entain, poor labour practices such as unreasonable working hours or pay, or experiencing poor working conditions
- Bribery or similar corruption for personal or business gain
- Unsafe working environments or breaches of health and safety or negative impacts on the environment

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

We know that it can take courage to do the right thing, which is why we promise to treat reports of misconduct or malpractice sensitively and confidentially. We will never penalise somebody who raises a genuine concern, even if it turns out that no wrongdoing took place.



The Quick Read



1

Anybody can report something they think may be illegal, unethical or breaches our code of conduct.

2

The conduct in question can also relate to a third-party partner or supplier.

3

Personal HR-related issues should normally be dealt with under our grievance procedure.

4

You do not have to prove misconduct, so long as you have a reasonable suspicion it has taken place or might take place.

5

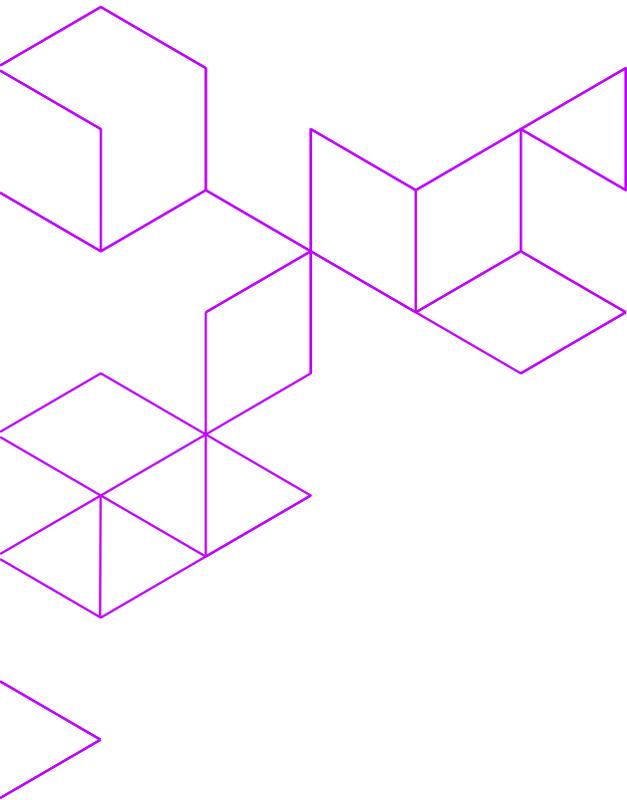
If you raise a genuine concern you will be protected from detrimental treatment even if it turns out that no misconduct took place. Malicious or deliberately false reports may be dealt with under our disciplinary procedure.

6

Reports will be treated confidentially unless you consent to us disclosing your details or we are legally required to disclose your identity (e.g. to the police or a court).



The Detail



1. Misconduct that should be reported using this procedure

The Speak Out policy should be used to report serious misconduct (or suspected misconduct) involving company employees or people who work for us in any capacity (whether third party suppliers, consultants or agents). For example:

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You can call about issues you are experiencing yourself, or if you have concerns about the behaviour or welfare of your colleagues. Speaking up for others is particularly important if you are worried about colleagues experiencing unethical behaviour or being potential victims of modern slavery. You can find out more about these issues by looking on Entain.me for policies, training materials and information.

Day-to-day work-related problems or complaints should normally be dealt with using our grievance procedure. If you are unsure whether something should be reported under this policy, please ask your line manager or HR, or contact Internal Audit.

If the matter relates to an urgent health and safety issue please immediately contact the HSSE team.

If the matter concerns a cybersecurity risk please immediately contact the security incidents team on securityincidents@entaingroup.com.



2. Taking your concerns seriously

You may be worried that you won't be taken seriously, or you'll be labelled as a troublemaker or somehow victimised. You may not be 100% sure that something has happened (or may happen), or perhaps you don't want to get somebody in trouble.

We want to reassure you that:

- All legitimate concerns will be taken seriously, even if you don't have complete proof;
- Nobody will suffer a consequence or be dismissed for reporting a legitimate concern so long as it wasn't made maliciously or you knew it was untrue;
- We will keep your identity confidential unless you consent to us releasing your details or we are legally required to disclose them (for example, to the police or as a result of a court order).

If you suspect that serious misconduct has taken place (or may take place), the important thing is that you tell somebody as soon as possible so that it can be investigated. It may turn out that nothing has happened, but equally, you may have prevented a serious crime happening or saved the group from major reputational or financial damage.

All employees who raise a concern will be protected if it has been done in good faith, regardless of whether the concern turns out to be genuine or not. Since we will protect your identity the chance of detrimental treatment being received as a result of raising a concern is extremely low, but will be treated as a serious disciplinary matter if it is found to have occurred.

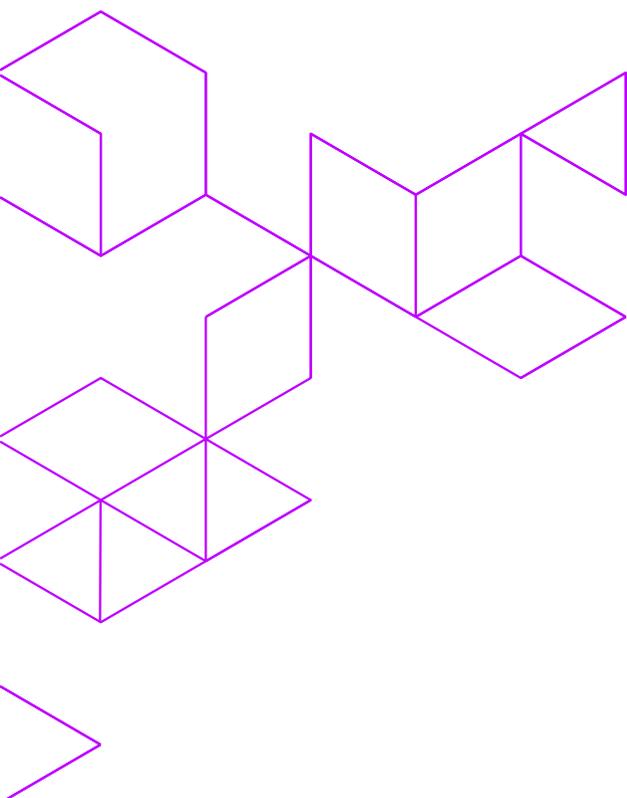
3. How to let us know

There are a few ways to report something to us:

Your Manager or HR

For employees, your first port of call should be your line manager or the HR team, who will try to resolve any issues in the first instance. Grievance matters reported via the whistleblowing route will be referred to HR for investigation in the first instance to follow the grievance process.





3. How to let us know – continued

Report by the dedicated EMAIL mailbox

The Audit Committee (a committee of the Board) has set up a secure, confidential mailbox for anybody who wants to raise a concern in writing. You may report to this address in whatever language you find most convenient. Send your report to the email address: whistleblowing@entaingroup.com.

The more detail you can share with us about your concern, including any specific examples if available, will help us start the investigation more promptly.

Independent Hotline and Web reporting portal

There may be occasions when raising the matter internally isn't appropriate or doesn't feel like the right thing to do, for example where your concern relates to criminal offences or a serious breach of our legal or regulatory obligations.

You can contact the independent hotline provided by EQS, either through their web portal using a computer or mobile device on (<https://entaingroup.integrityline.com/>), or by telephone on **(0044) 3332423759** (UK). Dedicated local phone numbers are also available for all Entain's major locations and can be found at the end of this policy. This service is available 24 hours a day 7 days per week.

EQS enables you to easily raise and discuss your concern in your choice of fifteen languages, by phone or online – **Bulgarian, Dutch, English, French, German, Italian, Portuguese, Spanish, Filipino, Latvian, Russian, Lithuanian, Estonian, Hebrew and Hindi**. Please tell them that your call relates to Entain, and they will then ask you for which business you work within Entain. You do not have to give your name if you feel uncomfortable to do so.

They will then guide you through a series of questions designed to help you tell them what you are worried about. All questions are optional and you should answer what you feel comfortable to do. Once you have made your report they will offer you the chance to create an account on the portal so you can correspond anonymously with the investigation team if you wish to do so, and receive updates on your case.

4. Investigations

All reports of misconduct or potential misconduct (including those made to EQS) will be referred to the Audit Committee. The Audit Committee have delegated Internal Audit to confidentially organise the conducting of the investigations on the Audit Committee's behalf unless it is more appropriate to ask an independent external party to support the investigation.



4. Investigations - continued

The Investigation Process

When your report is received we will begin an investigation. This may involve contacting you to discuss anything that is unclear and ensure that there is a full understanding of the situation.

Investigations are undertaken discreetly and confidentially. Please be aware that investigations can take some time but we will try to keep you updated on a regular basis. Your identity will not be disclosed to anyone in the process of the investigation even if you have not chosen to remain anonymous. The investigation team will not provide to you detailed findings or copies of any evidence so as to protect all other personnel involved and ensure that the investigation is truly independent.

Where necessary, we may put you in touch with relevant support organisations, such as the Employee Assistance Programme (EAP) on (UK 0800 030 5182 or specific local phone numbers for other global locations, all of which can be found on Entain.me under Wellbeing or by searching 'EAP') ([Employee Assistance Programme \(EAP\) for all other locations](#)), or assist you in obtaining support from specialists such as the UK Modern Slavery and Exploitation helpline (which can be contacted on 08000 121700).

5. Post-Investigation

We will keep you informed of progress and will usually let you know the outcome unless the matter is sensitive, or is the subject of criminal or civil proceedings. Please bear in mind that we cannot, for privacy reasons, discuss the content of disciplinary proceedings with other members of staff.

Investigation outcomes will be communicated to the Audit Committee and relevant Board directors. They will also be communicated to external stakeholders as needed depending on what has been found as the company is committed to excellent standards of governance and behaviour.

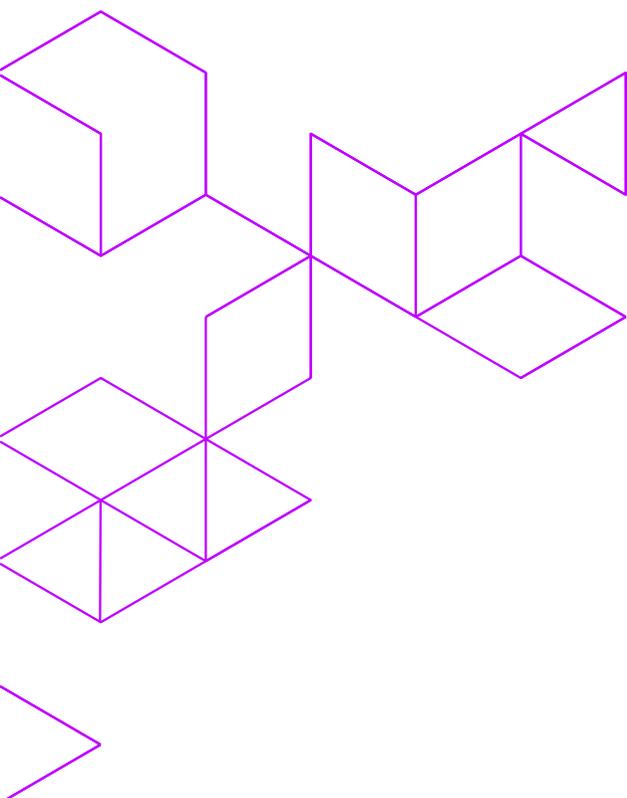
6. If you're not happy with the outcome

If you're not happy with the outcome of the investigation, you should contact the Director of Internal Audit or the Audit Committee Chairman by email at ACChair@entaingroup.com, giving your reasons.

Failing that, you can make a disclosure to the independent charity Public Concern at Work ("PCaW"). PCaW can provide confidential advice about whistleblowing in the public interest. The charity's helpline is +44 207 404 6609 or you can email them at whistle@pcaw.org.uk.



The Phone Numbers



Report by the independent hotline

Dedicated local phone numbers are available for all Entain's major locations provided by EQS. This is available 24 hours a day 7 days per week in multiple languages.

Countries	Call centre number	Countries	Call centre number
Australia	(0061) 800955921	Latvia	(00371) 80005746
Austria	(0043) 800677610	Lithuania	(00370) 880080036
Belgium	(0032) 80070110	Malta	(00356) 80062965
Bulgaria	(00359) 8002100284	Philippines	(0063) 180013120050
Jersey ¹	0044 1615324712	Poland	008001218720
Croatia	(00385) 800708002	Portugal	(00351) 800450211
Estonia	(00372) 8000100778	Ireland	(00353) 1800849012
Georgia ¹	0044 1615324712	Slovakia	(00421) 800000781
Germany	(0049) 8001819065	Spain	(0034) 900999423
Gibraltar ¹	0044 1615324712	UK	(0044) 3332423759
India	(0091) 8000502328	UK Toll ²	0044 1615324712
Israel ¹	0044 1615324712	USA	001 6282624028
Italy	(0039) 800761667	Uruguay ¹	0044 1615324712

Notes

¹ UK toll number to be applied

² Globally reachable toll number



