

## Gamesys Group Human Rights Policy

Gamesys Group plc (the “**Group**”, “**we**”, “**us**”, “**our**”) is a leading operator of online casino and bingo-led brands. Our diverse portfolio of distinctive and recognisable brands deliver best-in-class player experience and gaming content to a global audience. We take our sustainable business responsibilities seriously and our mission is to craft entertainment with care.

We recognise the importance of human rights and the negative impact that infringements have on rights-holders. Respect for human rights is core to our business and we are first and foremost committed to avoiding any infringement on human rights. Should we ever be involved in a breach of rights, we will take steps to address the impact.

### **Definition of human rights**

In the context of this policy we define human rights as those specified in the International Bill of Human Rights and the eight fundamental rights set out in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

### **Delivering our commitment**

In accordance with the UN Guiding Principles on Business and Human Rights we deliver our commitment to Human Rights by:

- Respecting the sovereign rights of host countries and obeying national laws in all countries in which the Group operates.
- Periodically working with third-party experts to evaluate the actual and potential human rights impacts of our business and supply chain through Human Rights Impact Assessments.
- Implementing appropriate mitigation measures to prevent potential risks and striving to remedy any actual human rights infringements.
- Making employees aware of their responsibilities in relation to human rights through our Code of Conduct.
- Measuring, monitoring and publicly reporting known and significant breaches of human rights arising directly from our operations.
- Taking steps to encourage our supply chain to respect and uphold human rights in their business.
- Prohibiting any lobbying activities acting on behalf of the Group that contrast with the international standards that we uphold in this policy.
- Making this policy publicly available on our website and communicating its content to all employees.

### **Human rights impact areas**

We are a multinational online service operator employing predominantly skilled workers and so the overall risk of our operations impacting on human rights is very low. However, we recognise that there are some areas of higher risk, notably data privacy, discrimination

and health and safety, and to a lesser extent local employment, freedom of association and collective bargaining, forced and child labour, security of employment, wages and benefits and working time.

Our policy in relation to each potential impact area is set out below.

**1. Data privacy.**

We recognise the importance of protecting personal information and are committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which we operate. Full details on our commitment and approach are set out in our Privacy Mission Statement, which is available on the Group website ([www.gamesysgroup.com](http://www.gamesysgroup.com)).

**2. Discrimination.**

We are committed to promoting equal opportunities in employment (including in matters of hiring, promoting and redundancies) and working conditions (including hours, benefits, training and remuneration).

We do not discriminate against employees or job applicants on the basis of race, colour, nationality, ethnic or national origin, age, sex or sexual orientation, gender reassignment, religion or belief, marital or civil partner status, pregnancy or maternity, political opinion or disability (including as a result of health conditions relating to coronavirus, HIV and mental health).

We pay equally where there are equal roles and performance.

**3. Health and safety.**

We are committed to providing a safe and healthy working environment to our employees. This includes the prevention of accidents, occupational diseases and mental ill-health and the enhancement of employee wellbeing. Compliance with health and safety regulations is mandatory and co-ordinated locally.

**4. Local employment.**

Recruitment of employees from the host-country is standard practice in our offices. Training and development opportunities are available to all employees, regardless of location.

**5. Freedom of association and collective bargaining.**

All employees are entitled in accordance with applicable legislation to establish and join worker representation organisations, and to have these organisations recognised for the purpose of collective bargaining. Appropriate facilities (meeting spaces etc.) are provided and employee representatives are afforded suitable paid time to conduct their role. In countries where collective worker representatives are in place, we will notify and consult with them on significant employment-related matters such as reorganisations. Prejudicial treatment of employees on the basis of

employee representation group membership and of employee representatives is prohibited.

**6. Forced and child labour.**

We prohibit forced or compulsory labour, child labour and all forms of modern slavery in our business. Controls are in place to verify the age and identify of new employees and all our employees are at least 18 years of age. In accordance with UK law we publish an annual Modern Slavery Statement on our Group website ([www.gamesysgroup.com](http://www.gamesysgroup.com)).

**7. Security of employment.**

Wherever possible we endeavour to provide stable employment for employees, responsibly manage reorganisations and minimise redundancies. We aim to follow due process for all terminations and, in the case of redundancies, we strive to always provide a reasonable notice period or compensation in lieu thereof.

**8. Wages and benefits.**

We are committed to providing decent and market-aligned rewards and benefits to our employees. Benefits are tailored to the local area and norms, and may include health insurance, life insurance, retirement provisions and a share-incentive plan.

We are fully compliant with all applicable legislative minimum wage requirements. Colleagues also have the opportunity, where applicable and should it ever be needed, to negotiate wage conditions collectively through employee representation groups.

All employees in the UK are paid at least the real Living Wage, as defined by the Living Wage Foundation.

**9. Working time.**

We do not condone or require our employees to work excessive working hours, which in accordance with the International Labour Standards (“ILO”), we define as more than 48 hours a week. This applies to all countries in which we operate, including those which have no regulatory maximum working hours. All employees with one year’s service are entitled to at least the ILO recommended minimum of three weeks’ equivalent of paid time-off per year.<sup>1</sup>

**Infringements and policy breaches**

Any breach of this policy, or any suspected infringement on human rights can be raised confidentially to the People Team or through our independent whistleblowing hotline in accordance with our grievance and whistleblowing policies.

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<sup>1</sup> Effective from 1<sup>st</sup> January 2021.



**Scope**

This policy is applicable to the whole of Gamesys Group plc including all its subsidiaries.

**Accountability**

Accountability for the policy rests with the Group's Board of Directors. The Sustainability Director, overseen by the Environment, Social and Governance Committee, is responsible for the day-to-day implementation of the policy.

Signed by:

A handwritten signature in black ink, appearing to be 'LF', written over a light grey diagonal line that spans the width of the page.

Lee Fenton, Chief Executive Officer of Gamesys Group plc  
Date: 10/12/20