

Human Rights and Modern Slavery Statement 2020

Scope

Playtech is committed to upholding and promoting human rights across our global operations and supply chain. This is a core part of our overall commitment to becoming a more sustainable business and playing a positive role in society. As part of this commitment, we are taking action to improve our understanding and mitigation of human rights and modern slavery risks as they relate to our industry, geographic footprint, operating model, supply chain and employment practices. We also recognise that the Covid-19 pandemic has the potential to negatively impact the situations of people trapped in modern slavery around the world.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Playtech has taken during the financial year ending 31 December 2019 to prevent modern slavery from occurring in its operations and supply chains, as well as its plans for the future.

Overview

Playtech Plc and its subsidiaries (the “Group”) are committed to upholding human rights in their operations and supply chain. This is a core element of the Group’s overall commitment to responsible business practices.

The Group supports and adheres to the principles embodied in the Universal Declaration of Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The Group is committed to upholding human rights and ensuring that it is not complicit in the violation of human rights. This includes human trafficking and slavery, which can occur in many forms including forced labour, child labour, domestic servitude, sex trafficking and workplace abuse.

In addition, Playtech’s pledge to uphold human rights and tackle modern slavery in its supply chain will be reflected as a specific commitment in its new five year sustainability strategy, which will be launched during 2020.

About Playtech Plc – Business Structure and Supply Chain

Playtech Plc is one of the world's largest suppliers of online gaming and sports betting software, including business intelligence driven gambling software, services, content and platform technology. Playtech Plc is the parent company of the Group and has its head office in the Isle of Man.

Details of the Group’s principal subsidiaries can be found in Note 37 on pages 156-157 of the Annual Report 2019, which can be found on www.investors.playtech.com.

The Group has more than 6,000 employees located in 21 countries. Playtech also owns and operates the leading sports betting and gaming brand in online and retail in Italy, Snaitech. Playtech's Financials Division, named TradeTech Group, is a technology leader in the CFD and financial trading industry and operates both on a B2B and B2C basis. In its operations, the Group primarily procures technology and infrastructure products and services including software, hardware and data hosting services and professional advisory and support services. The Group's three major areas of procurement spend are: technology (cloud services, hardware and mobile services); marketing; and property services (leasing, facilities and cleaning). Between them, these three categories account for a significant proportion of global procurement spend.

Policies, Governance and Accountability

The Group operates to the highest business, employment and recruitment standards and has a zero-tolerance policy towards human rights violations. Every employee has the responsibility to uphold the principles set out in this statement in addition to complying with the Group's ethics and compliance policies. The Group requires all employees to adhere to both these principles and all related policies, practices and procedures.

This statement will be disseminated to employees on an annual basis and will be available on the Playtech Plc website and intranet. This statement will also be referenced and reflected in the Group's updated corporate policies, which are disseminated to employees and contractors on an annual basis, alongside the Group's new sustainability strategy and commitments.

In 2019, the Group created a new global and centralised procurement function and appointed a new global head of procurement. As part of this new structure, a new operating model has been introduced with the objective of strengthening governance, compliance and responsible business standards. Human rights have been integrated as part of this new structure, in line with the Group's overall core strategy.

As a result, the Group published its procurement compliance policy this year. The policy included specific elements to reflect the Group's commitment to protecting human and labour rights in the supply chain. To ensure the successful roll-out of the new policy, 56 procurement employees in key markets received tailored training on it. The Group also continues to promote an independent, confidential "Speak Up" line for employees to use to report any ethical or legal concerns. This is highlighted and discussed with employees on induction and during annual compliance training.

The Group will continue to review the implementation of its ethics and compliance policies as part of its Group risk, audit and assurance processes. In 2020, the Group will publish new employee safeguarding and anti-discrimination policies and update its existing Business Ethics and Speak Up policies.

The Group's Risk and Compliance Committee has ultimate responsibility for reviewing the effectiveness of this statement. This Committee continues to set the agenda and monitor the implementation of strategy and progress related to responsible business, ethics, regulatory affairs and compliance. Non-Executive Director, Claire Milne, has been Chair of the Committee since 2018, and also serves as the Board-level champion on these topics. Details of the Group's responsible business governance structure can be found in the Annual Report 2019.

Due Diligence Processes, Risk Assessment and Training

As a provider of software and services to the gambling and financial trading industries, human and labour rights and modern slavery issues do not pose the same level of risk for the Group as they do for companies in the manufacturing or industrial sectors. The Group's most salient human and labour rights issues revolve around employment, data protection, procurement of goods and services and anti-money laundering (with special regard to ensuring that persons involved in human trafficking and modern slavery cannot launder money through the Group's operations). In 2019, Playtech conducted a comprehensive review of its compliance risk across the Group, which included a review of human rights and modern slavery risk. The aim of the review was to surface and prioritise risks across its business and value chains. As part of this review the Group:

- Updated its human rights risk assessment, which helped the Group identify the areas of highest risk within its business operations. This process included in-depth review of the Group's human rights and modern slavery risks across business units and geographies as well as key functional areas such as employment, procurement, and data protection. The risk assessment methodology included conducting interviews with key management, reviewing anonymous surveys completed by 36 functional and business unit managers and undertaking an independent review by external legal advisors

- Continued to include human and labour rights risks as part of business partner due diligence and onboarding.

Through the use of the Group's online KYC and compliance monitoring tool, monitored 427 suppliers, 253 Playtech subsidiaries and 353 directors of third party suppliers for compliance issues including human rights and modern slavery risks.

Continued to embed legal and compliance requirements in third party contracts, including those related to human and labour rights, anti-money laundering, anti-bribery and corruption, ethics, data protection and anti-facilitation of tax evasion.

Continued to promote the independent, confidential "Speak Up" line to employees, suppliers and business partners.

Following on from the findings of the compliance risk review, the Group has put in place a set of action plans covering key areas of the business. These plans will continue to form part of Playtech's effort to minimise and mitigate compliance risks in 2020. Proposed actions include:

Strengthening capabilities within the procurement and human resources functions through additional training and guidance.

Reviewing and tracking actions and improvements in country-level procedures and protocols, including third party recruitment and employment arrangements, in high risk countries. High risk countries are defined to align with high risk countries listed in independent indices covering human right and corruption risks, such as the Global Slavery Index and Transparency International's Corruption Perceptions Index.

Strengthening compliance processes as part of the implementation of the new procurement function, systems and procedures.

Continuing to increase awareness of human rights and modern slavery as part of the Group's new sustainability strategy and related policies.

Monitoring functional and business unit actions resulting from the 2019 human rights risk assessment.

During 2019, we have delivered refresher training on human rights to 40 human resources, procurement and technology managers across the Group operations.

Future Plans

Upholding and promoting human rights is a core part of the Group's overall commitment to responsible business practices. This is why we will continue to strengthen Playtech's approach to this issue.

During 2020, we will continue to actively deliver on the action plans put together this year as a result of our new human rights risk assessment. This includes continuing to strengthen the capabilities of our procurement and human resources functions, to raise employee awareness of the issues, and to improve monitoring so as to track progress. In relation to the final point, the Group will monitor and track the risks identified as part of its quarterly compliance risk assessment process, its due diligence monitoring, its independent "Speak Up" line and its audit and assurance processes. Commitments will also be tracked as part of the Group wide sustainability reporting. Additionally, the Group will record any human rights flags identified as part of compliance monitoring conducted on third party business partners. The company monitors third party risks through an online compliance monitoring tool designed to assess and monitor compliance, regulatory, legal and reputation risks of third parties. Cases flagged for human rights concerns will then be reviewed on a case-by-case basis to further assess the risk and what additional controls may be required.

The Group will publish new employee safeguarding and anti-discrimination policies and update its existing compliance policies, including the Group Business Ethics Policy and Speak Up Policy. The Group will continue to review the implementation of its policies as part of its Group risk, audit and assurance processes.

In 2020, the Group will deliver refreshed and tailored training on human rights to build capacity and skills amongst relevant employees and senior managers, with a particular emphasis on managers in key functional roles, such as human resources and procurement.

This statement will be updated annually to reflect the Group's ongoing focus on these issues.

This statement was approved by the Board on 19 May 2020.

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Chief Executive Officer

Playtech plc