

POLICY

Modern Slavery Statement



Modern Slavery Policy

i. Summary and Policy Objectives

Modern slavery is a crime and a fundamental violation of human rights. 888 Holdings plc and its subsidiaries (the “**Group**” and/or “**we**”) takes this very seriously and actively works to eradicate any form of modern slavery in our direct operations and in the indirect operations of our supply chain.

As such, we expect the same high standards from all our contractors, suppliers and other business partners regardless of where they are located; and we will not, knowingly or unknowingly, support or do business with any individual or organisation involved in slavery, servitude, forced labour, human trafficking or child labour (all as defined in the UK Modern Slavery Act 2015 and collectively to be referred to as “**Modern Slavery**”).

Specifically, this anti-Modern Slavery policy (the/this “**Policy**”) has been created and is intended to target any possible vulnerabilities in the Group’s supply chain for the occurrence of Modern Slavery and implement procedures that are aimed at preventing the Group from engaging with any persons or entities that engage in Modern Slavery.

This Policy seeks to strike a reasonable balance between: (i) the Group’s core values of acting legally and ethically which strongly oppose all forms of Modern Slavery; (ii) the Group’s commitment to complying with applicable law and regulations; (iii) the Group’s need to focus on our core business operations; and (iv) the Group’s constraints in encroaching on the independence of our suppliers and their operations.

ii. Application

This Policy is to apply to all Group companies and relevant suppliers.

iii. The Group’s Structure, its Business and its Supply Chains

Industries that are particularly at risk of Modern Slavery are labour intensive and characterised by a high proportion of migrant workers undertaking unskilled and irregular work - often supplied through recruitment intermediaries.

As the Group is an entertainment business, and in general our workforce is highly skilled due to the technical and highly regulated nature of our offering - we have a relatively small supply chain compared to other businesses, particularly due to the online nature of our core product. Moreover, our supply chain is largely characterised by the purchase of marketing, advertising and professional services, software, customer payment services, call centre services, IT and telecommunications services, hospitality and insurance. Therefore, due to the nature of our business and the skill levels required from our employees and business partners, we believe that we are at a very low risk of being complicit in Modern Slavery. Nonetheless, the Group has implemented important measures to check for, and prevent, any possible Modern Slavery practices within our own business and supply chains to ensure that neither we, nor our suppliers, are engaged in such practices.

The Group has offices in a number of locations, including the United Kingdom, Ireland, Gibraltar, Israel, Malta, Poland, Bulgaria, Philippines, Romania and the United States. These offices are primarily consumers of goods and services from a number of primarily local suppliers in fields such as cleaning, catering and security, in addition to building maintenance, rent and insurance. Other than governmental suppliers and public utilities which it is believed would already undergo a high level of scrutiny, the Group acknowledges that there could be a small risk that some such commercial suppliers could engage in Modern Slavery and therefore the Group will apply continuous risk assessment and due diligence to such suppliers.

iv. Responsibility

888 Holdings plc's Board of Directors has overall responsibility for ensuring this policy complies with our legal obligations. The Group's Company Secretary is responsible for ensuring due implementation of this policy. The Chief Procurement Officer is responsible implementing modern slavery risk mitigation in the supply chain.

v. Relevant Company Policies

In addition to the implementation of this Modern Slavery policy, the Group has a number of additional policies and procedures which are important for ensuring related rights and obligations are upheld and which demonstrate our commitment to promoting ethical and legally compliant treatment of all persons at all stages of our business and supply chain. Some of these include:

- Ensuring the Group's employment, service and supply agreements are compliant with local laws of the jurisdictions in which they exist and/or serve, and include appropriate prevention of Modern Slavery obligations where appropriate. This includes liaising with local legal counsel in relevant Group subsidiary locations, to ensure compliance with local labour and other relevant laws;
- Ensuring all employees and contractors undergo identity and right to work checks before they are offered a contract with us;
- Other policies of the Group, including its Anti-Bribery and Corruption Policy, which provide important guidelines to ensure the Group, its employees and where relevant, service providers, uphold both legal and ethical standards required;
- The Group's whistleblowing policy to ensure that our employees and contractors can voice any concerns about Modern Slavery, as well as other regulatory, compliance or ethical matters, without fear of repercussion.

vi. Risk Assessment and Due Diligence undertaken for Group Suppliers

We take the management of our supply chain seriously and believe that it is important to responsibly select suppliers. We seek to ensure that our contracts with suppliers require them to comply with all applicable laws and regulations. In addition to this, Procurement will undertake enhanced due diligence through the following actions:

- Ensuring robust Modern Slavery provisions are included in each of each supplier contract
- Conduct a desk-based audit on the whole supply base to determine a risk rating approach to each suppliers
- Implementation of Modern Slavery provisions in all formal tendering;
- Implementation of automated and continual supply base screening on Modern Slavery risk through the use of 3rd party software;
- To continue to take appropriate action wherever behaviors or activities not consistent with Group policies are discovered.

vii. Communication and Awareness of the Modern Slavery Policy

The Group will communicate the policy to all colleagues and make it available on both the corporate website and intranet.

viii. Annexures to this Policy

Annex 1: Slavery and Human Trafficking Statement

Modern Slavery Statement

INTRODUCTION

The Modern Slavery Act 2015 ('the MSA' or 'the Act') requires UK companies to promote ethical business practices and policies that protect workers from being abused and exploited in their own organisations and global supply chains. The Act specifically requires all businesses with annual revenues of over £36 million to publish a transparency statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains.

888 Holdings, which is the Group's qualifying entity for these purposes, published its first transparency statement to comply with the Act in 2017. This constitutes the Group's sixth transparency statement, under the Act.

About 888 Holdings

888 Holdings plc ("888") is one of the world's leading betting and gaming companies. In 2022, 888 acquired the international (non-US) business of William Hill to create a global industry leader. Headquartered in Gibraltar and listed in London, the Group operates from 12 offices worldwide and employs over 10,000 people globally.

The Group's mission is to lead the gambling world in creating the best betting and gaming experiences, bringing unrivalled moments of excitement to people's day-to-day lives. It achieves this by developing state-of-the-art technology and content-rich products that provide fun, fair and safe betting and gaming entertainment to customers worldwide.

The Group owns and operates internationally renowned brands, including 888casino, 888sport, 888poker, William Hill and Mr Green. In addition, the Group operates the SI Sportsbook brand in the US in partnership with Authentic Brands Group.

The Group is registered with appropriate authorities in the relevant countries in which it has operations, including with the Great Britain Gambling Commission and continues to focus on encouraging responsible gambling and shaping industry best practice. We work closely with customers, sports bodies, and suppliers to help improve the business we operate in.

888 Holdings plc is listed on the London Stock Exchange and is a member of the FTSE4Good Index.

POLICIES

As a Group, we are committed to conducting our operations with honesty and integrity, and with respect for human rights and the interests of our employees and shareholders.

We similarly respect the legitimate interests of those with whom we do business, and who are affected by our operations.

Our Anti Modern Slavery Policy has been approved by the 888 Holdings plc Board and sets out the basic principles that we expect all to comply with across the Group. Our policy operates within a framework to comply with all relevant laws.

ASSESSMENT OF RISK

The Board of 888 Holdings plc remains cognizant of the continuing and emerging risks, impacts and costs of global slavery and human trafficking, and fully supports both the original principles of the MSA. We actively maintain a zero-tolerance approach to slavery and trafficking in all its forms, in any part of its business or supply chain, continuing to apply the UN Guiding Principles on Business and Human Rights and core labour standards set out by the International Labour Organisation.

The ESG Committee of the Board oversees our approach to addressing modern slavery risk and through our well-established governance and risk frameworks, the Board is kept informed of material developments in this area. The Board has approved this Transparency Statement.

The Group Procurement function continue to review and assess the risk of modern slavery in our business and supply chain. We can reaffirm that both 888 and William Hill, its operations and supply chain remain materially 'low risk' in terms of both actual instances of, and the potential for, slavery or trafficking. This assessment is based on: the nature of the Group's businesses, which are focused on retail and online gambling and gaming products and markets; there having been no significant changes to the nature of the Group's businesses or operations during the year; the robustness of the Group's people and supply chain policies; and that the majority of the Group's operations are based in, and, revenues derived from countries deemed low risk by conventional sustainability indices,

including The Global Slavery Index (<http://www.globallslaveryindex.org/index>). We also believe that the Group's business model is unlikely to create material risks of slavery and trafficking where none existed previously. This is because relatively few raw or manufactured materials are employed in the business, and a significant majority of those working within the business are employed directly by the Group, in line with the Group's employment policies and practices.

We do however recognise that some of the Group's operations and supply chains extend into countries deemed to present a somewhat higher modern slavery risk level, according to the Global Slavery Index. Relevant Group functions continue to consider appropriate ways in which risk levels arising in, for example, Philippines, Romania and Bulgaria, can be assessed and mitigated. No matters of concern have been identified to date.

DUE DILIGENCE AND RISK MANAGEMENT

The Group has continued to pursue the introduction of modern slavery preventative clauses within its supplier agreements.

The Group routinely conducts reputational checks, which specifically cover reports of modern slavery, when contracting with new suppliers. Furthermore, prospective suppliers responding to formal tender requests by the Group must confirm their ongoing compliance with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes applicable from time to time.

TRAINING

Training on Modern Slavery and Human Trafficking is available through our e-learning platform and helps ensure the business remains compliant with the Act, as well as mitigates against the risk of modern slavery and human trafficking existing in our business and supply chain.

The training reflects case study examples, as well as procedures related to recognizing and reporting suspected cases. In addition, all of our staff are encouraged to discuss any concerns

they may have in relation to Modern Slavery either with their line manager or through the independent Whistleblowing hotline.

2023 ACTIONS

Specific actions taken in 2023 to further strengthen our approach to managing Modern Slavery risk, included the following:

- Reviewed and enhanced a new Anti Modern Slavery Policy for the combined 888 and William Hill Group;
- Continual review of alert driven monitoring across William Hill supply base for any adverse findings; and
- Conducted a full desk-based audit conducted on the Group's combined supply base to determine a risk rating approach to our suppliers.

FUTURE COMMITMENTS

1. To maintain the Group's zero tolerance approach to Modern Slavery and human trafficking.
2. To fully implement alert-driven monitoring of the supply base via 3rd party software to identify any changes in the practices of existing or new suppliers across the combined 888 and William Hill Group.
3. To continue to take appropriate action wherever behaviours or activities not consistent with Group policies or values are discovered.
4. Implementation of Modern Slavery obligations in all formal tendering as minimum qualification criteria.

TRANSPARENCY STATEMENT

This Transparency Statement is made by 888 Holdings plc in accordance with Section 54(6) of the MSA, for the financial year ending 31 December 2023.

The statement has been formally approved and signed on behalf of the Board of Directors of 888 Holdings on 20 March 2024.



Per Widerström
Chief Executive Officer
20 March 2024