



Σntain

ESG Report 2022-23

moments  
of  
excitement

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We are Entain. Like our customers, we get excited about the world of sports, gaming, and interactive entertainment. Whether it is watching your favourite team, beating your mates or experiencing the next big thing, we love exciting moments. We also work hard to do right thing for our customers, our colleagues, and our communities. We are delighted to share our 2022 ESG report.

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ESG Report 2022



# Res- pon- sible moments

## About Entain

### Our vision and purpose

At Entain, everything we do is aimed at delivering the very best in betting, gaming and interactive entertainment. We are one of the world's largest sports betting, gaming and interactive entertainment groups, operating in regulated and regulating online and retail markets. Our unique platform distinguishes us as an operator, enabling us to grow our core business while expanding into new areas of growth, and embracing new opportunities, all with a customer-centric approach. We have placed sustainability at the heart of our business strategy and we are proud to lead our industry across the ESG landscape.

# Our strategic framework

## Our Vision

# The world leader in betting, gaming and interactive entertainment

### 2022 priorities

### 2022 progress

## Growth

### 1 – Leadership in the US

Clear ambition to be the leading operator in the US sports betting and gaming market through BetMGM.



Established as a top-three US operator, BetMGM achieved an 18% market share overall in the markets we operate in and a leading market share of 30% in iGaming. Now live in 26 markets, reaching 48% of the adult population in the US, as well as operating in Ontario, Canada.

### 2 – Grow presence in existing markets

Continue to grow rapidly in the >40 territories in which we already operate.



Increased number of First Time Depositors and active players while growing market share in key markets, demonstrating our ability to attract, engage and retain players. Online NGR growth on a compound annual basis over the last three years is 12% (cc)

### 3 – Expand into new regulated markets

Significant opportunities exist to expand into new regulated markets through organic opportunities as well as M&A.



Five transactions announced during 2022, including Sports Interaction (Canada), Klondaika (Latvia), Totolotek (Poland) and BetCity (Netherlands). Established Entain CEE, and acquired SuperSport (Croatia), to create a strategic platform in Central and Eastern Europe.

### 4 – Extend into interactive entertainment

Entain is at the forefront of leveraging opportunities created as new technology-enabled forms of entertainment continuously evolve.



Grew activities by 7% Online to achieve new record levels. Continued to expand media, content, and interactive entertainment across our major markets. Launched Unikrn's esports offer in Brazil and Canada.

## Sustainability

### 5 – Lead on responsibility

Provide the safest experience for our customers whilst encouraging the industry to follow our lead. Continuously upgrade and personalise our protections for customers.



Delivered enhancements to our Advanced Responsibility & Care™ ("ARC™") programme which uses technology to proactively intervene to prevent betting and gaming-related harm from developing. Rolled out ARCTM to 22 international markets.

### 6 – Diversify our regulated activities

Operating in a well-structured regulatory regime enables us to deliver higher-quality earnings with greater certainty and sustainability as we continue to grow and expand our global footprint and scale.



From February 2023, 100% of our revenues are from regulated or regulating markets.

### 7 – Broaden our customer appeal

Attracting and retaining an increasingly recreational audience by placing customers at the centre of everything we do, and providing safe and entertaining experiences.



Introduced further enhancements to our customer proposition with new games, experiences, products and content, documentaries and social channel interactions.

### 8 – Invest in our people and communities

Ensure Entain is the best place to work while positively contributing to communities where we are based and operate.



Through our Entain Foundation, we continued to invest in safer gambling programmes, grassroots sports initiatives and increased diversity through technology projects. Launched our new DE&I strategy.

Key: Achieved



On target



Not achieved



## Our Purpose

Bring moments of excitement into people's lives

### Priorities for 2023

- Enter new states as they regulate with market-leading customer offer.
- Continue to innovate in existing markets focusing on products, brands and marketing.
- Identify new opportunities in the 40+ regulated markets where we do not currently operate.
- Deliver new customer propositions outside of our traditional product offer.

#### Market access

**150m people**

#### Group NGR growth

**+12%**

#### Online NGR

**£3,050.5m**

#### Underlying EBITDA

**£993.2m**

### Risks

- Technology failure.
- Loss of key locations.
- Trading, liability and pricing management.
- Strategy, and execution in growth markets.
- Trading, liability and pricing management.

### Remuneration

- Executive annual bonuses are linked to Operating Profit, Online NGR growth and safer betting and gaming targets and customer metrics.

- Work with regulators in all our markets to implement and/or improve regulations for customers and work towards licencing, in still-regulating markets.
- Further evolve and roll-out ARC™ and increase investment in all areas of research, education and treatment of problematic behaviour.
- Safer betting and gaming metric continues to make-up 15% of 2023 bonus payments for all office-based employees.
- Continue roll-out of Foundation investment programmes to more international markets.

#### Contribution to safer betting and gaming initiatives

**£18.3m**

#### Employee satisfaction with an approach to wellbeing

**87%**

#### Target set for carbon Net Zero throughout operations

**2035**

#### Commitment to Entain Foundation over five years<sup>1</sup>

**£100m**

- Ensuring our customers are properly protected.
- Ensuring the health, safety and wellbeing of our people.
- Ability to recruit and retain employees.
- Data breach and cybersecurity.
- Changes in betting and gaming legislation.
- Changes in betting and gaming tax regimes.

- Safer betting and gaming metric and customer satisfaction metrics implemented for 2022 bonus schemes.

1. This commitment included our voluntary contribution to UK Gambling Commission approved Research, Education and Treatment ("RET") providers. With the UK's Gambling Act Review recommending a move to a compulsory levy of 1% of UK Gross Gaming Yield ("GGY") (subject to consultation), we are reviewing the financial commitments of the Group's Foundation going forward.

## Message from the Chair of the Board Sustainability and Compliance Committee

At Entain, sustainability is at the heart of our business strategy. We firmly believe that the most sustainable operators will be the most successful in our industry. Our Sustainability Charter underpins this approach and is built around four core principles: an exclusive focus on regulated markets; taking the lead on responsible betting and gaming; best-in-class corporate governance; and investing in our people and communities.

2022 saw us stepping up our commitments across these four pillars. And to support our ambitions, we appointed Sophie Platts as Entain's Group Head of Sustainability. Sophie came into this newly created role after four years as Entain's Head of Safer Gambling and External Affairs, successfully leading our safer betting and gaming strategy and launching the Entain: Sustain ESG Event Series. We are proud to say that Sophie's achievements are already celebrated externally, as she won the Sustainability Champion of the Year at the 2023 British Diversity Awards.

In May 2023, we evolved our ESG governance structure to better manage the expanding workload of the ESG Committee and further embed ESG activity across the Group. We created two new Board committees:

- the People and Governance Committee which adds oversight for people and corporate governance functions to the responsibilities previously overseen by the Nomination Committee.
- the Sustainability and Compliance Committee which manages all the other areas which previously came within the remit of the former ESG Committee (see page 8 for more details).

As Chair of the Sustainability and Compliance Committee, I am delighted to share the progress we made in the past year:

### An exclusive focus on regulated markets

- 100% of our revenues are from domestically regulated or regulating markets.
- Exited nine markets with no clear path to a safe regulated betting and gaming industry.
- Holding domestic licences in 30 countries and 25 U.S. States.

### Continuing to take the lead on safer betting and gaming

- Successful roll-out of our pioneering ARCTM player protection programme outside the UK to 22 international markets.
- Increased UK contributions to Research, Education and Treatment ("RET") to 0.75% of GGY, moving to 1% in 2023.

### Pursuing the highest standards of corporate governance

- 33% of our Board is female.
- Entain published first-ever Board Diversity Policy.
- 15% of the group-wide bonus is based on a safer betting and gaming metric and 5% on a customer metric.
- The Big Six Compliance Programme drove the average completion rate in mandatory employee training to 93% – up from 82% in 2021.



We were pleased to see our efforts being recognised by being named Socially Responsible Operator of the Year.”

**Virginia McDowell**  
Independent Non-executive  
Director and Chair of Board  
Sustainability and Compliance  
Committee



### Investing in people and our communities

- We announced a new partnership with McLaren Racing to support women returning to the tech sector.
- We saw a 13% reduction in our absolute Scope 1 & 2 GHG emissions intensity per employee against our 2020 baseline, with nearly 100% renewable energy in our UK retail estate.
- We submitted our net-zero target by 2035 and near-term greenhouse gas reduction target for verification by the science-based targets initiative.
- We partnered with EcoVadis to deepen our engagement with our suppliers on our environmental and social ambitions.

At the end of April 2023, the UK Government's Department for Culture, Media and Sports published the UK Gambling Act Review ("GAR") White Paper. We at Entain welcome this publication, which is an important step towards having a robust regulatory framework in the UK that is fit for the digital age and creates a level playing field for all operators. Our 2022 ESG report describes the proactive actions we have already taken to deliver a safer environment for our customers, many align with the proposals of the GAR White Paper (for more information, see page 12).

We were pleased to see our efforts being recognised by credible third parties. In 2022, Entain was the largest operator to be awarded the highest level of accreditation (Advanced Level 3) for its online activities and Advanced Level 2 for its land-based activities. We were also named the global 2022 Socially Responsible Operator of the Year by leading industry experts at SBC. Our continued membership of the FTSE4Good index and the Dow Jones Sustainability Index is a further recognition, coming outside our industry.

I hope you enjoy reading this report and learning about our progress and ambitions for the future. We are confident that our Sustainability Charter will continue allowing us to recruit and inspire the best people in the industry, provide customers with entertaining, trusted, and safe experiences, and support our community organisations that are doing great things.

#### Virginia McDowell

Independent Non-executive Director and Chair of Board Sustainability and Compliance Committee

19 May 2021

## The Sustainability and Compliance Committee is delighted to announce the appointment of Sophie Platts as Group Head of Sustainability.



I couldn't think of a more exciting time to take the reins of Entain's sustainability strategy. Our pioneering ARC™ player protection programme is being rolled-out across our operations, successfully decreasing harmful behaviours amongst our players. We are implementing the policies, tools, and partnerships to decarbonise our operations and meet our ambitious Net Zero by 2035 target. We are also driving diversity across our industry through new and innovative ways, like our new partnership with McLaren Racing to support women returning to the tech sector. I look forward to the coming years, as Entain continues setting the highest sustainability standards for our industry."

#### Sophie Platts

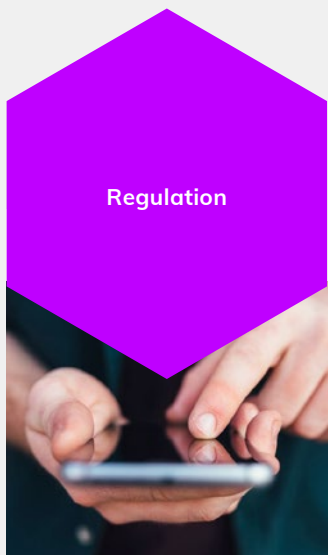
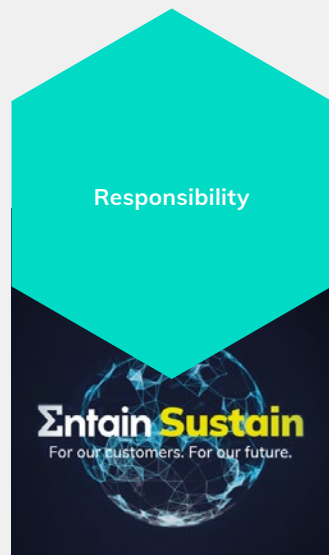

Group Head of Sustainability



## Our approach

# Entain Sustainability Charter

At Entain, we have proudly placed sustainability on an equal footing with our growth strategy. We embrace our role within society and want to take the lead on the issues that matter to us – sustainability, diversity and responsibility – with the strongly held belief that the most sustainable business in our industry will be the most successful. This is reflected in our Sustainability Charter, which outlines our ESG leadership ambitions across the four pillars below.

 <p><b>Regulation</b></p>	 <p><b>Responsibility</b></p>	 <p><b>Corporate Governance</b></p>	 <p><b>People &amp; Communities</b></p>
<p><b>Commitments:</b></p> <ul style="list-style-type: none"> <li>● Only operate in regulated markets</li> </ul> <p><b>2022 highlights:</b></p> <ul style="list-style-type: none"> <li>● 100% of revenues from domestically regulated or regulating markets</li> <li>● Exited nine markets with no clear path to a sustainable and safe regulated betting and gaming industry<sup>1</sup></li> </ul>	<p><b>Commitments:</b></p> <ul style="list-style-type: none"> <li>● Lead the industry on safer betting and gaming</li> </ul> <p><b>2022 highlights:</b></p> <ul style="list-style-type: none"> <li>● Successful roll-out of our pioneering ARC™ player protection programme outside the UK to 22 international markets</li> <li>● Increased UK contributions to Research, Education and Treatment ("RET") to 0.75% of GGY, moving to 1% in 2023</li> </ul>	<p><b>Commitments:</b></p> <ul style="list-style-type: none"> <li>● Best-in-class corporate governance</li> </ul> <p><b>2022 highlights:</b></p> <ul style="list-style-type: none"> <li>● Publication of Entain's first-ever Board Diversity Policy</li> <li>● Rolled out an extensive 'Big Six' training programme covering areas such as Code of Conduct, prevention of bribery &amp; corruption and tax evasion, governance, risk and compliance</li> </ul>	<p><b>Commitments:</b></p> <ul style="list-style-type: none"> <li>● Best place to work</li> <li>● Net-zero greenhouse gas ("GHG") emissions by 2035</li> <li>● Promote diversity in and through technology</li> </ul> <p><b>2022 highlights:</b></p> <ul style="list-style-type: none"> <li>● A 13% reduction in our absolute Scope 1 &amp; 2 GHG emissions intensity per employee against our 2020 baseline, with nearly 100% renewable energy in our UK retail estate</li> <li>● Partnered with Racing to launch a brand-new Returnship programme</li> </ul>

**Long-term sustainability = Long-term success**

1. Entain finalised those exits in January 2023. When we publish this report, 100% of the Group's revenue come from domestically regulated markets where it is licensed except for a small number of markets where we expect changes in regulation or partnering with a locally licenced operator.



## Priority goals



### Aligning our commitments with the Global Goals

To make sure our focus is aligned with global priorities, we have undertaken an assessment of the UN Sustainable Development Goals, to identify our priority Goals where we can have the most impact on Society. Through this assessment, we have identified four priority Goals where we can have the greatest impact, and where we see the most alignment.

There are also two supporting goals that we will focus on in order to support our priority goals. Throughout this report, we have outlined where we are making contributions to these Goals.

### Key supporting goals



## ESG Governance

Delivering on our Sustainability Charter and ESG commitments starts with robust governance. As our ambitions grow, and best practice evolves, we continue to expand our processes.

### Board Committee Oversight

As noted above, in May 2023, Entain restructured its Board oversight of ESG issues to better manage the increasing workload of the prior ESG Committee and further embed sustainability across the Group. The newly created Sustainability and Compliance Committee was created to take on either the bulk or much of the responsibilities of the former ESG Committee. The Sustainability and Compliance Committee has oversight for safer betting and gaming, regulatory compliance, anti-money laundering (“AML”) and counter-terrorism financing, anti-bribery & corruption (“ABC”), Human Rights (including our approach to addressing Modern Slavery risks), health and safety, environmental impact (including the evolution of our strategy and processes in response to the Taskforce for Climate-related Financial Disclosures), data protection and charitable donations, including the work of the Group’s Entain Foundation. Chaired by Virginia McDowell, one of our Non-Executive Directors, the Committee has three members and guides the business on all aspects of ESG strategy, sets targets and monitors our performance. The second newly created Committee, the People and Governance Committee, took on the responsibilities of the previous Nominations Committee and also added responsibility for as well as oversight of the Group’s approach to Diversity, Equity and Inclusion as well as and other people-related functions such as engagement and culture and employee wellbeing.

In line with the schedule of the prior ESG Committee, it is expected that the Sustainability and Compliance Committee will continue to meet on a bi-monthly basis, to ensure that the Committee’s agendas enabled it to cover the Group’s activities and how these underpin the Group’s ESG strategy.

You can read more about the Board’s ESG Committee’s activities last year in the 2022 Annual Report. Read more about our approach to corporate governance in the section below.

### The ESG Steering Group

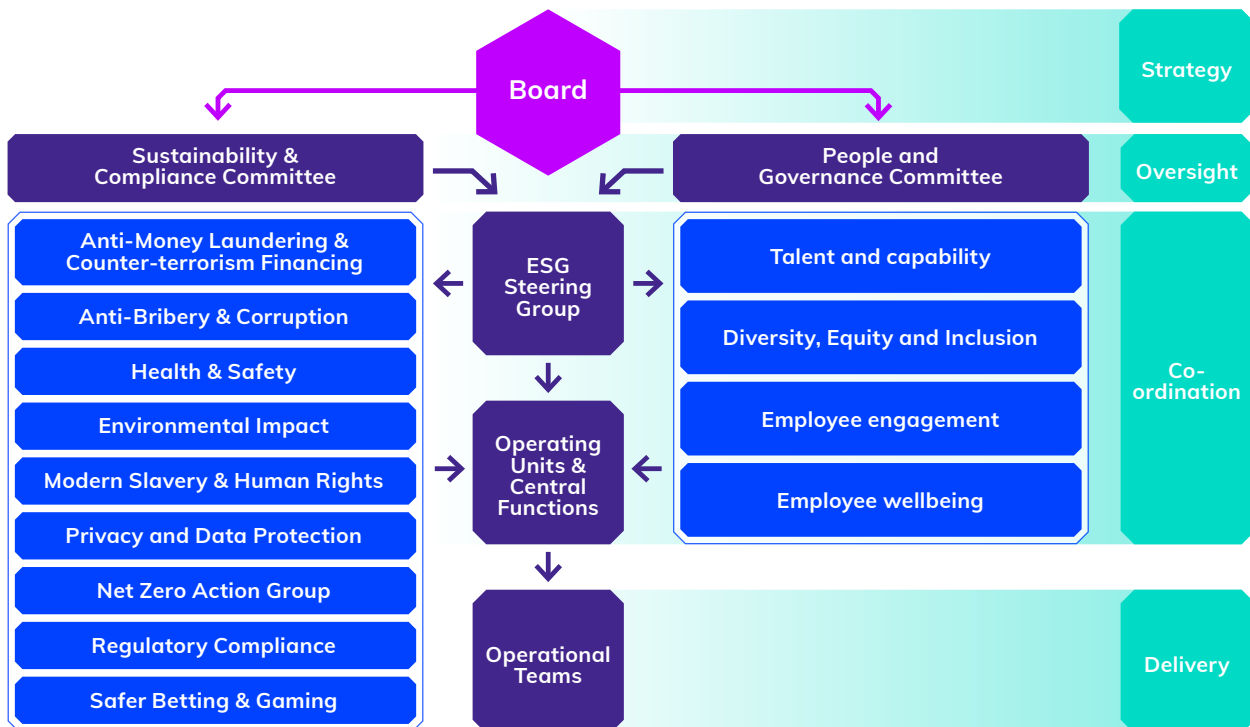
The ESG Steering Group, which meets on a monthly basis consists of functional leaders from across the business, including Sustainability, Investor Relations, Human Resources, Corporate Affairs, Legal, Health, Safety & Security, Operations, People and Communications. Convened by our Group Head of Sustainability and chaired by our Chief Governance Officer, the Group oversees the implementation of our sustainability strategy.

### Climate governance

Given the urgent need for action to address the climate emergency, we have stepped up our governance in this area. Our CEO is now responsible for our approach to climate change, and climate-related risks and opportunities. In addition, we have developed our Net Zero Action Group. The Net Zero Action Group reports to the ESG Steering Committee, which is a selection of leaders from around the business who are responsible for delivering and developing an organisation-wide approach to achieve our Net Zero ambitions.

### Issue-specific Committees

In addition to the ESG Steering Group and the Net Zero Action Group, we have formed groups that report to the ESG Steering Group that focus on delivering our approach to specific ESG issues that require additional expertise and insights from the business. Steering groups include groups focused on Anti-modern Slavery and Human Rights, Safer Betting and Gaming, Anti-Money Laundering, and Diversity & Inclusion.



## ESG Materiality at Entain

In 2022, we commenced a full review of the material issues that are relevant to Entain. The assessment considered materiality through two lenses, aligned with the concept of double materiality:

- what are the ESG issues that will have the most impact on Entain?
- what ESG issues are the most important to our stakeholders?

We conducted a desk-based review and surveyed over 250 of our internal and external stakeholders. External stakeholders included customers, investors, business partners, and Foundation partners, asking them about the issues that they see as most impactful for Entain to focus on. To gain more qualitative information, we conducted follow-up interviews with these internal and external stakeholders, to understand the justification behind their responses and understand their expectations on how Entain should respond.

To understand the impact of each issue on Entain, we conducted a series of workshops with senior leaders within the business, to confirm the results of the assessment, and get their feedback on the impacts of the relevant ESG issues on Entain. We involved our Chief Risk Officer in the process to align the assessment with the outcomes of the Group's Risk Framework.

As in previous years, we will continue to review our material issues and impacts annually, undertaking full assessments where necessary.

The assessment outlined eight key ESG issue clusters that are relevant to both our stakeholders and our business. Beneath each cluster, we have specific issues which further help us to shape our response.

The assessment found that the top priorities for the business are safer betting and gaming, and ethical and compliant behaviour. The assessment found that stakeholders across all groups have high expectations of Entain in terms of safer betting and gaming. Internal stakeholders, including senior management, also noted that this is an area that is fundamental to our business. The findings also suggested that Entain has a responsibility to uphold ethical and compliant behaviour throughout our business, both to reduce reputational and legal risks, but also as a requirement to have a positive impact the other seven issue clusters.

Whilst these two issues were most important, the assessment found that the other six issues are still relevant to Entain, and stakeholders expected Entain to address these and report on progress.

The detailed findings of the assessment will be reviewed internally in 2023, and will be used to inform our strategy and approach to ESG going forward.

The outcomes of our materiality assessment are shown in the graphic below.



# Regulation

As of February 2023, 100% of Entain's revenue comes from domestically regulated or regulating markets.

In 2020, Entain made a commitment to only do business in countries where we hold a local licence (regulated countries) or those countries that were on a path to revising their laws and regulations which would allow us to apply for a domestic licence in the near- to mid-term (regulating countries). We firmly believe that strong, commercially viable regulation of the betting and gaming sector is in everyone's best interest. It provides stability for operators, important taxation streams for governments and – most importantly – it provides the consumer with proper protections and safeguards by ensuring that only responsible providers operate in the market.



At the start of 2023, we accelerated this process by exiting the few remaining markets where there was no clear path to regulation. Since 2020, we have closed our offering in more than 150 unregulated markets. We have also doubled the number of regulated countries where we operate, holding domestic licences in 30 countries and 25 U.S. States. We remain active in only a small number of regulating markets, where we do not currently hold a domestic licence, but we foresee positive changes in regulation. This includes Brazil, Chile, and Peru, which are all in the process of rolling out licence regimes in the next 12 to 18 months.

In 2022, we obtained a licence in Zambia and are close to securing one in Kenya. We are also pursuing licence options in a number of other countries in Africa. In Canada, we were successful in getting licences in Ontario for our bwin, Party, Sports interaction and BetMGM brands. In Germany, we were awarded slots and poker licences, whilst also successfully renewing our sports betting licences. Through our acquisitions of Totolotek, BetCity and SuperSport we also now have licences in Poland, the Netherlands and Croatia respectively. Turning to Latin America, we have partnered with a land-based casino in Mexico and are expecting to launch online once the licence consents have been issued later this year. To read more about regulatory developments, and how we engage with regulators, please refer to pages 35 and 39 of our 2022 Annual Report.



We firmly believe that strong, commercially viable regulation of the betting and gaming sector is in everyone's best interests."

# Responsibility

## Safer betting and gaming



Through our award-winning Safer Betting and Gaming programme, we take a holistic approach to protecting the customer, investing millions into research, education, and treatment. In 2022, we continued rolling out ARC™ – our Advanced Responsibility and Care™ programme – to 22 international markets.

We were pleased to see the success of our approach recognised in 2022 with the award of the Advanced Safer Gambling Standard by GamCare, the leading UK safer betting and gaming charity.

Entain was awarded the highest level of accreditation (Advanced Level 3) for its online activities, and Advanced Level 2 for its land-based activities, underlining Entain’s sector-leading approach to safer gambling. In addition to the ARC™ programme, which supports the pillars of our Changing for the Bettor strategy, we continue to deliver on the seven areas through our other initiatives, as outlined in the following pages.



**Activated with ARC™, Entain's Advanced Responsibility and Care™ programme**

## Entain's Response to the UK Gambling Act Review

Entain welcomes the publication of the UK Gambling Act Review (GAR) White Paper by the UK Government's Department for Culture, Media and Sports. The GAR White Paper is an important step towards having a robust regulatory framework in the UK that is fit for the digital age, raises standards across the industry, and creates a level playing field for all operators.



The GAR White Paper includes a number of important proposals. The key areas that will have an impact on our UK online operations are:

- £2 slot limit for under 25s
- Staking limits of £2-£15 for online slots
- The requirement for operators to carry out financial checks based on online customer deposits, principally being £1,000 per day, or £2,000 over 90 days
- Controls over certain game features
- Introduction of mandatory deposit limits and use of bonuses
- Compulsory industry levy on Gross Gaming Revenue ("GGR")
- An independent industry ombudsman funded by the industry.

We continue to lead the industry on player protection and have proactively taken a number of actions to deliver a safer environment for our customers, many aligned with the proposals outlined in the GAR White Paper:

- We have developed and rolled out ARC™ (Advanced Responsibility & Care), our innovative, AI-driven, proactive player protection programme, which is already delivering meaningful improvements to protecting our customers;
- We have already implemented an affordability model across the UK – with soft checks on customers from as low as £100;
- We have introduced personalised staking limits for online slots;
- We terminated VIP schemes across the UK in 2020.
- We were the first industry operator to voluntarily commit to donating 1% of UK gross gaming revenue to research, education, and treatment in respect of problem gamblers; and,
- We actively supported the proposal for an independent industry ombudsman.



“The UK Gambling Act Review is an important step towards having a robust regulatory framework that is fit for the digital age and creates a level playing field for all operators. As a global and diversified business that operates in over 40 regulated or regulating territories around the world, all of which are regulated or regulating, we are firmly in favour of regulation that preserves the market for the vast majority of customers who enjoy recreational betting and gaming, whilst also ensuring appropriate protection to all players.”

**Jette Nygaard-Andersen**  
Entain's CEO

## Advanced Responsibility and Care (ARCTM)

We can now demonstrate that ARCTM is successfully decreasing harmful behaviours amongst our players. In 2022, ARCTM helped more than half of higher-risk customers de-escalate their risk level.

ARCTM is our industry-leading pioneering approach to customer protection and the driving force behind our vision to be the go-to platform for safe play. ARCTM switches our player protection approach from reactive to proactive by allowing players to receive the intervention they need in real-time, not after the fact. Using behavioural indicators, data science, and analytics to assess risk in betting and gaming, ARCTM works behind the scenes using advanced artificial intelligence to learn and identify risks in player behaviour so we can intervene before a problem develops – providing a digital safety net for all our customers. In 2022, we improved the accuracy of our predictive tools by launching a new hybrid model that identifies both short and long-term excessive play.

We also introduced 15 new safer gambling features and began the roll-out of ARCTM outside of the UK, with phase one of the programme going to 22 international markets and phase two with real-time interactions live in 10 markets. After a focus on implementation in 2021, we can now demonstrate that ARCTM is successfully decreasing harmful behaviours amongst our customers and is helping them to play safely. Across the year, ARCTM achieved a 36% reduction in at-risk customers.



Entain has worked with us throughout the year to ensure that the ARCTM programme is growing in the right way and achieving the aim of the project to identify the behaviours that can lead to harmful gambling.”

### Dan Spencer

Director of Safer Gambling at EPIC Risk Management

## How does ARCTM identify high-risk behaviours?

ARCTM technology allows us to identify customers who need our support the most, intervening with measures that are specific to their needs. With the launch of Long-term Excessive Play (“LTEP”) in 2022, ARCTM now operates a hybrid model that accurately detects both short and long-term excessive play.

Our Short-Term Excessive Play (“STEP”) model is sensitive to large daily spikes in customer activities. STEP draws upon 26 research-backed markers of protection – over three times more than in our 2020 model – going beyond merely financial markers to include other behavioural characteristics. Examples of these markers include fluctuations in stake levels, erratic play during a single session, or signs that a customer might be chasing losses. In 2022, EPIC Risk Management, the leading harm-minimisation consultancy, conducted an audit of the STEP model and found it to identify high-risk behaviours with 92%<sup>1</sup> accuracy.

Our new LTEP model complements STEP by detecting customers who are at risk of causing themselves harm over the long term. LTEP identifies changes in a player’s habits over a longer period, for example picking up on a slow but steady increase in cancelled withdrawals or repeated deposits on loss. We found that LTEP detects high-risk customers with 88%<sup>2</sup> accuracy and that the overlap with the players identified by STEP is only 20%, showing the importance of both models.

We continue refining the markers underpinning STEP and LTEP through our partnerships with leading research institutions and consultancies, including lived experience insights from EPIC Risk Management, Professor Mark Griffiths of Nottingham Trent University, and Cambridge Health Alliance Division on Addiction, a Harvard Medical School Faculty.





## What are our plans for 2023?

ARC™ is continually improving, with regular testing and expert analysis to further enhance player protection. In 2023, we will continue to build on the success of ARC™ by implementing it across all our markets as well as our retail shops.

**Gambling controls:** we will work with experts to increase the efficacy of our gambling controls, including our mandatory Play Break for customers playing unusually long sessions.

**Real-time tools:** we will add a new real-time tool to detect customers intensifying their playing to recoup previous losses – also referred to as chasing losses.

**International:** we will continue the international roll-out of ARC™, introducing it into our global operations. We will adopt a staged approach to ensure that ARC™ provides the same high level of player protection, whilst adapting it to meet the unique regulatory, cultural, and game-specific requirements in each market.

**Retail Shops:** we will take what we learn with ARC™ in a digital environment and adapt it to our retail shops. We will refine the behavioural indicators we use to detect customers at risk in our shops, training our shop colleagues to spot subtle signs of harmful gambling and effectively communicate with customers.

## The effectiveness of ARC™ is linked to remuneration

The importance of ARC™ and our commitment to ESG and safer gambling is reflected in our colleague and executive remuneration structure. In 2022, 15% of the Group's annual bonus scheme was based on the business demonstrating that the ARC™ models are successfully influencing customer behaviours, implementing ARC™ in nine additional markets outside the UK, and achieving high levels of completion for the Safer Gambling training. To ensure the credibility of the process, we commissioned EPIC Risk Management to provide an independent review which determined that we met our targets for the year. In 2023, the ESG component of our Group annual bonus scheme will continue to focus on safer gambling to incentivise the roll-out of ARC™ across our global operations and its adaptation to the retail environment.

1. EPIC Risk Management conducted an audit in 2022 that evaluated the accuracy of the STEP model as 96% for the top 50 high-risk players, 92% for randomly selected high-risk players, and 80% for randomly selected medium-risk players. We report here the result for Top 50 High Risk to allow for year-on-year comparison as other data is not available for 2021.
2. EPIC Risk Management evaluated the accuracy of the LTEP model as 96% for the Top 50 High Risk players, 88% for Randomly Selected High Risk players, and 90% for Randomly selected Medium Risk players.

## How does ARC™ protect players?

With ARC™, we made step-change improvements in the safer betting and gaming tools that we provide customers to empower them to be in control of their play. As part of the enhanced customer journeys in ARC™, we are now able to proactively provide players with tailored recommendations and informative content based on their style of play.

In 2022, we added new features to the on-site interceptors that enable us to intervene and speak to a customer quickly. For example, we worked with Professor Mark Griffiths of Nottingham Trent University on a Safer Gambling Questionnaire to interact with players who present a medium risk of harmful gambling. The questionnaire is made of four short self-assessment questions that help us better understand a customer's playing habits. Based on their answers, we may offer them a personalised gambling control tool, refer them for a chat with our player protection team, or suspend their account in real time.

We also made additions to our safer gambling tools. We launched a budget calculator to help players understand what they can and can't afford so that they can continue playing safely. We also updated our safer gambling help page, providing players with seamless access to engaging research-backed safer gambling support and content.

## How does ARC™ prevent harm using real-time interventions?

With ARC™, we use real-time data and advanced analytics to immediately help customers who start exhibiting signs of unusual behaviours. For example, we can detect customers who deposit more than they usually would within a session of play. Once identified, a customer will initially be advised that they are depositing more than normal and offered the chance to reassess their depositing. If they do not set a control themselves, we will step in and prevent further deposits from being made. As a result, we are seeing positive actions by customers with a reduction in higher deposits and a significant reduction in the number of customers who raise their depositing.

In 2022, we expanded our real-time capabilities. We developed new tools to detect unusually long-playing sessions, larger withdrawals, an excessive number of payment methods and bank-declined deposits. We also reduced the threshold to interact with customers regarding their playing habits. We are now engaging earlier with more customers and, as a result, we found that fewer players need us to intervene with mandatory controls or account suspension. This shows that our messaging is successfully reducing risk-conducive behaviours before they become a problem.

## ARC™ Results

An assessment of ARC™'s performance in the UK in 2022 found:

- Over 3.7m interactions and interventions proactively delivered
- ARC™ is driving uptake in our gambling controls with 97% of higher-risk, and over 73% of medium-risk customers using gambling controls following interventions
- The most successful ARC™ model\* resulted in a 36% drop in customer risk rating following an intervention.

\* Based on ARC™'s real time unusual deposits feature.



# Safer betting and gaming





## Understand the problem and best solutions

### Entain's cutting-edge research collaboration with Cambridge Health Alliance Division on Addiction, a Harvard Medical School Faculty.

Investment in research is fundamental to Entain's commitment to better understanding and reducing the potential for problem gambling behaviours to develop. We have developed long-term research partnerships with world-leading institutions in safer betting and gaming, which shape our player protection practice and the development of the ARC™ programme.

In the US, we have partnered with the University of Nevada, Las Vegas, and their International Gaming Institute ("IGI"). With Entain's founding grant, the IGI launched a pioneering gaming and health initiative in 2022 that, for the first time in the US, combines scientific research with operational expertise to apply best practices in responsible betting and gaming, policy, and health. The programme offers online educational activities and served as the go-to resource for entities like the NFL, US Soccer, the Japanese Government, Ya'amava Resort, Las Vegas Sands, and dozens of other major organisations.

2022 marked the fourth year of our flagship research collaboration with the Cambridge Health Alliance Division on Addiction ("CHADA"). We have already contributed \$4.4m to the programme which shapes our safer gambling activities and contributes to the wider industry's knowledge on gambling-related harm.

Our collaboration funds the equivalent of eight full-time researchers – six researchers at the doctoral level, a part-time researcher at the master's level, and two part-time researchers at the baccalaureate level. Since 2019, the research teams have submitted 13 papers with an additional six in active development for submission to peer review. Entain not only provides funding but gives access to anonymised data from player records, ensuring that the research is based on real-life data and behavioural patterns.

The ongoing projects with CHADA fall under the four categories below. This important research is published in peer-reviewed and high-impact scientific research articles, with a worldwide circulation. The journals include Psychology of Addictive Behaviours, PLOS One, and International Gambling Studies.

#### Player data research projects

Using real-life, anonymised player records from Entain to contribute to a growing body of knowledge revealing the nature of actual online gambling. These projects help refine our understanding of evidence-based markers of disordered gambling and underpin the 26 markers we currently use as part of the ARC™ programme.

1. Gray, H. M., Edson, T. C., Nelson, S. E., Grossman, A. B., & LaPlante, D. A. (2021). Association between gambling and self-harm: A scoping review. *Addiction Research & Theory*, 29(3), 183-195. <https://doi.org/10.1080/16066359.2020.1784881>
2. McAuliffe, W., Louderback, E. R., Edson, T. C., LaPlante, D. A., & Nelson, S. E. (2022). Using "Markers of Harm" to track risky gambling in two cohorts of online sports bettors. *Journal of Gambling Studies*, 38, 1337-1369. <https://doi.org/10.1007/s10899-021-10097-0>

#### Safer betting and gaming training projects

We disseminate learnings from our research collaboration to our colleagues through various training activities. Since 2019, CHADA conducted reviews of 15 existing Entain employee training programmes, five teach-in seminars with select Entain employees to present research findings, and the creation of 10 digestible research snapshots with graphical summaries of published research.

#### Open science projects

Both CHADA and Entain are committed to upholding the highest standards and the principle of academic freedom.

In addition to engaging in open science practices for these research projects, including research pre-registration and data transparency, CHADA has engaged in multiple projects and papers to advance the field of gambling studies toward more open science practices.

#### General research projects

These projects address important areas in the field of gambling studies. These included for example a study on the state of the literature about gambling and self-harm<sup>1</sup> and understanding gambling product safety features<sup>2</sup>.

**\$4.4m**

contributed by Entain to date

**13**

submitted research papers

**13**

of Entain's safer gambling training programs reviewed

**8**

FTE researchers, health educators, and staff

**21**

research presentations, teach ins, panels, and posters





## Educate our key stakeholders

We continue partnering with charities and other organisations across different markets to prevent vulnerable audiences from potential betting and gaming harm.

As part of our involvement with the UK Betting and Gaming Council, we support the Young People's Gambling Harm Prevention Programme which is delivered by leading charities, GamCare and Ygam. Since it was launched in 2020, the programme has delivered training to over 24,000 professionals who have influence over young people including over 10,000 teachers. These professionals will use evidence-based resources to educate and safeguard an estimated 2,000,000 children and young people. Entain's support has allowed Ygam to increase its growth, reach, and impact – with two additional full-time outreach staff. Ygam's latest Impact Report revealed that 2022 was the charity's biggest year to date with millions of children and young people in England, Wales and Northern Ireland now receiving their harm prevention education.

# 92%

of students were confident they would seek support or encourage a fellow student to seek support if they are worried about gambling.

We support EPIC Risk Management to deliver a first-of-its-kind education programme with the National Collegiate Athletic Association ("NCAA") in the US. As sports betting is licensed and launched in an increasing number of states, this programme is front and centre of conversations at a time when it is needed most. In 2022, EPIC reached student-athletes across 61 colleges, targeting groups that are more likely to experience problems with betting and gaming. After the session, 92% of students were confident they would seek support or encourage a fellow student to seek support if they are worried about gambling. For more information about other Entain charitable partnerships, you can refer to our 2022 Social Impact Report.

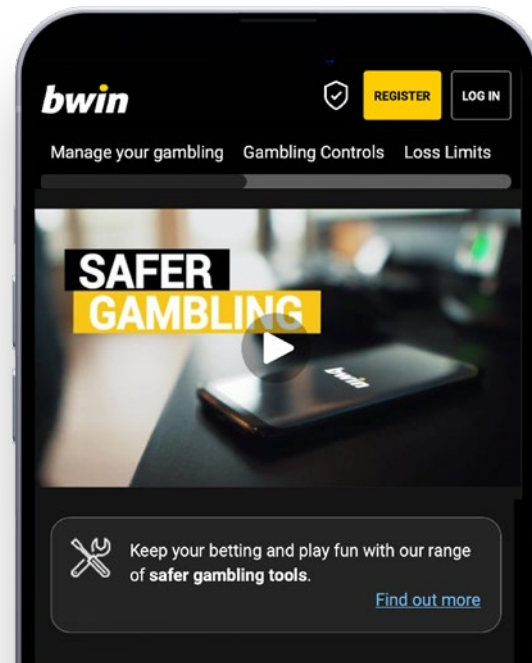


## Promote responsible attitudes

Responsible 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 have a long history of leading the industry in this area, being the first UK betting and gaming company to call for and implement a whistle-to-whistle advertising ban in 2019. After the ban, total betting and gaming advertising exposure over the full duration of live sports pre-watershed programmes declined by 78%, resulting in 103 million fewer advertising views between comparative weekends. The ban also cut the number of gambling ads seen by children by 97%. The same year, we voluntarily ended all football shirt sponsorship deals with UK teams and banned perimeter board advertising at football grounds, allowing sports fans to watch their favourite teams without seeing any incentives to bet. We are a signatory of the European Betting and Gaming Association's Code of Conduct, and in the UK, we continue working with the industry via the UK Betting and Gaming Council ("BGC"). In early 2022, we released our Group Responsible Marketing Policy which outlines our commitment to market Entain's products and services in a clear, transparent, and socially responsible manner. Sponsored by the Chief Governance Officer, the policy applies to all marketing activity undertaken by all brands within the Group and applies to all marketing activities and channels. It is complemented by internal guidelines for each market where we operate, including examples of acceptable and unacceptable marketing behaviour.

Through our work with the BGC, we have developed the industry's codes of practice for advertising and marketing. This includes dedicating 20% of our UK advertising space to responsible gambling messaging and initiatives, ensuring that social media ads are only targeted at people over 25 years old, and only showing YouTube ads to people that have been age-verified.





## Empower customers

The ARC™ programme represents a step-change in the way we empower our customers to be in control of their play.

Using behavioural indicators, data science, and analytics to assess risk in betting and gaming, ARC™ works behind the scenes to learn and identify risks in player behaviour so we can intervene before a problem develops. ARC™ provides a digital safety net for our customers with tools and interventions tailored to their style of play.

For those customers who wish to take time out altogether, we also continue promoting the use of the Gamban software, which allows users to block betting and gaming websites and apps globally from their devices. Since 2022, our UK frontline colleagues get access to GamCare's Helpline Transfer Service, enabling them to transfer callers in need of support straight to the National Gambling Helpline for specialist help. This service is only accessible to gambling operators who can demonstrate their commitment to safer gambling and high levels of staff training.

We also take part in all relevant industry-wide self-exclusion programmes in the markets where we operate. In the US, BetMGM is integrating GameSense, an innovative responsible gaming programme, into its platform. In collaboration with four of our US peers, we have also established the 12 Principles of Responsible Online Gaming, setting a new benchmark for responsible operations. The Principles include a commitment to only operating in legal markets that offer consumer protections, providing customers with easily understood responsible gaming tools, and taking active steps to prevent underage gaming. All the operators involved also pledged to adopt a nationwide responsible gaming toll-free helpline.



## Fund treatment for those in need

Our commitment includes supporting people who find their gambling starts affecting their lives.

Our commitment includes supporting people who find their gambling starts affecting their lives. In the UK, we contributed 0.75% of our Gross Gaming Yield in 2022 to support Research, Education and Treatment ("RET") of problem gambling – up from 0.5% in 2021. In 2023, we will increase this proportion to 1%, a significantly higher figure than the minimum voluntary requirement of 0.1% and in line with the UK's Gambling Act Review.

We partner with leading organisations across our markets to fund treatment for those who need it, including Cognacity in the UK, FEJAR (Federación Española de Jugadores de Azar Rehabilitados) in Spain, or SOS Joueurs in France. In 2022, Entain supported Gordon Moody's online Gambling Therapy helpline and Betblocker's free multiplatform betting and gaming blocking software, helping both initiatives to expand their reach across European and wider global communities. In 2023, we will launch a new Alumni Project with Gordon Moody to establish a network of former problem gamblers who have been successfully treated and now want to support others.



## Champion responsible product design

With the ARC™ programme, we took responsible product design to new heights.

By using three times more risk markers than ever before and developing real-time interventions tailored to each player, we empower customers to use our products safely. Working with the BGC and other industry groups, we will continue sharing our learnings with peers to create a safer environment for all customers.

Protecting our customers also means protecting their personal data. We have embedded privacy-by-design protocols, ensuring that we balance the need for data-driven insights to enhance player protection, whilst also complying with data privacy laws. Our data privacy teams are working closely with our customer insights experts to understand our customers' level of trust in Entain processing their data.





## Change ourselves for the better

Safer betting and gaming underpin everything we do, and it is essential that all our colleagues receive training on those issues.

Our 2022 Group bonus was linked to achieving high levels of completion for our safer betting and gaming training. At the end of the year, 98% of colleagues were up to date on their mandatory safer betting and gaming training (including new joiners and colleagues on long-term leave). EPIC Risk Management, our independent consultants on gambling harm minimisation, also delivered tailored training to 915 colleagues interacting with customers, empowering them to spot the signs of elevated-risk behaviours and to provide effective and empathetic customer interactions. EPIC also trained the Entain Board and senior leaders globally on the lived experience of problem gambling. In 2023, we will maintain our strong commitment to mandatory training on safer betting and gaming, with a refreshed module on Compliance, Safer gambling, and Anti-Money Laundering.

# 98%

of colleagues were up to date on their mandatory safer betting and gaming training at the end of the year.



Safer betting and gaming performance	2022	2021	2020
Cash and in-kind contributions towards responsible betting and gaming initiatives	£18.3m	£12.9m	£9.7m
Customer interactions regarding problem gambling <sup>1,2</sup>	1,807,892	2,268,550	1,390,906
ARC Interactions <sup>4</sup>	3,720,015	n/a	n/a
Customer complaints <sup>1,2</sup>	4,215	4,045	6,378
Customer complaints specifically related to a betting and gaming transaction <sup>1,2</sup>	629	655	919
Self-exclusions made <sup>1,2,3</sup>	60,261	61,644	59,465
Robberies	73	36	45
Anti-social behaviour	5,979	4,216	4,760
Assaults	240	132	204

1. Data covers all UK licences.

2. 2020 data has been restated to remove discontinued licenses, to be comparable to 2021 and 2022 data.

3. Data only includes self-exclusions made via Entain's own processes (eg via customer services) and does not include third-party self-exclusion schemes such as, for example, GAMSTOP (National Online Self-Exclusion Scheme) and the Multi-operator Self Exclusion Scheme. This information has been obtained from Entain's Regulatory Returns.

4. This figure includes all ARC™ real-time packages and risk-based interceptors, as well as ARC™ emails. It is a count of the number of customer interactions, not at a distinct customer level. This figure includes the 1,807,892 interactions reported under 'Customer interactions regarding problem gambling'.

# Best-in-class corporate governance

A key pillar of Entain's sustainability strategy is to adopt gold-standard corporate governance. This is delivered through a robust framework of oversight and control that utilises the knowledge and experience of the Board, the executive and senior members of the management team.

## Governance and Compliance Review

In our 2021/22 ESG report, we shared the results of the corporate governance and compliance review we had commissioned from Alvarez & Marsal, an independent third party. In 2022, we wanted to address their recommendation that Entain's risk function is given more weight in the organisation, that it be better resourced, a freestanding second line function with a more complete set of risk tools and capabilities and should be led by a senior person.

Therefore, we appointed a Chief Risk Officer, Steve Howells, who reports directly to the Chief Governance Officer. Our Chief Risk Officer is supported by a team of five risk managers, who have continued to evaluate, assess and monitor risks, both threats and opportunities, across our enterprise, ensuring our critical controls are operating effectively in line with Entain's risk appetite. An updated enterprise risk management programme has been developed in line with the principles of the international standard for risk management, ISO 31000.

In 2023, we will undertake a follow-up independent audit of our governance and compliance processes, following on from the 2021 Alvarez & Marsal review.

## Board independence and diversity

The Board has responsibility for establishing Entain's purpose, values and strategy, as well as overseeing the conduct of its business and promoting the long-term sustainable success of the group, generating value for shareholders and contributing to wider society.



The Board believes that an inclusive and diverse membership results in optimal decision-making.”

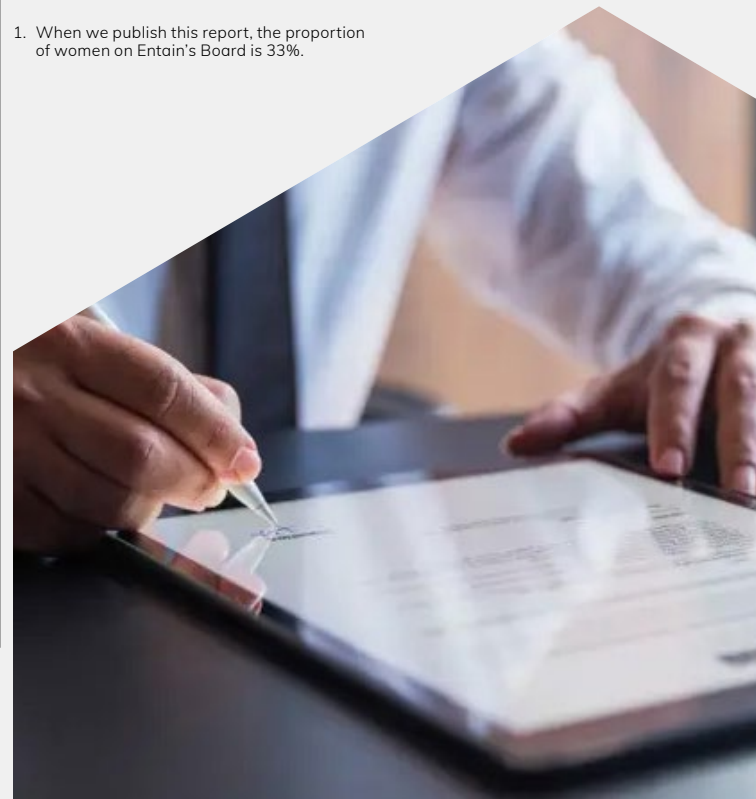


The Board believes that an inclusive and diverse membership results in optimal decision-making. Our Nomination Committee continued to appraise appointments to the Board in line with its commitment to diversity. The proportion of women on the Board at 31 December 2022 remained at 36%<sup>1</sup>. Following Rahul Welde's appointment, as of 31 December 2022, the Board meets the Parker Review's target of at least one Director from an ethnic minority background. In 2022, the Committee also reviewed and recommended the Board Diversity Policy which was subsequently approved by the Board. This can be found on our website at [www.entaingroup.com](http://www.entaingroup.com).

The Committee considered the independence of each Non-Executive Director (NED) as part of its recommendation to the Board for Director re-election. In making this recommendation, the Committee also considered the time commitment and performance evaluation of each Director standing for appointment.

Each NED must be able to devote sufficient time to the role in order to discharge his or her responsibilities effectively and the Board is satisfied that the Chairman and each of the NEDs devote sufficient time to their duties. The Chairman, Senior Independent Director and other NEDs each have letters of appointment and do not serve in an executive capacity. Excluding the Chairman, of the remaining eight Directors, five are independent NEDs. The Nomination Committee, having considered the matter carefully, is of the opinion that all the current NEDs remain independent. The composition of all Board Committees complies with the 2018 UK Corporate Code recommendations.

1. When we publish this report, the proportion of women on Entain's Board is 33%.



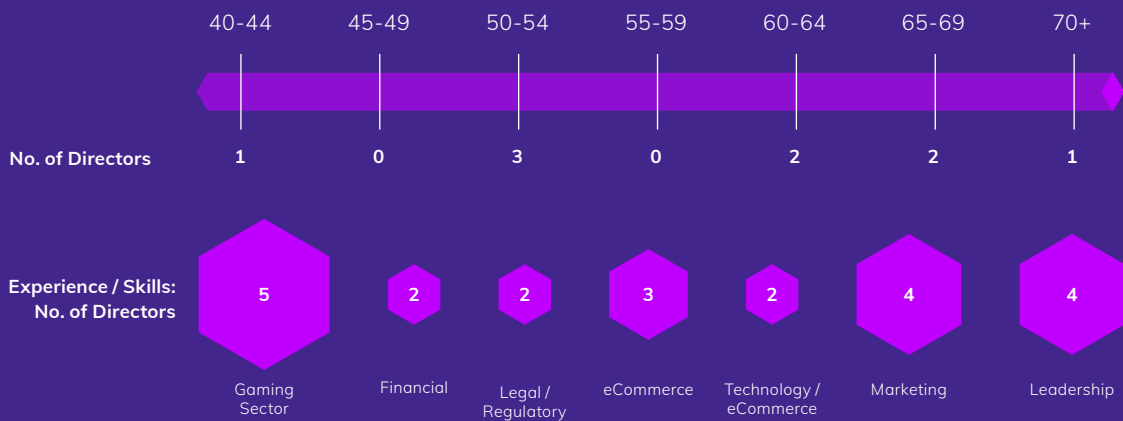
# Board of Directors

(as at 9 March 2023)

## Tenure



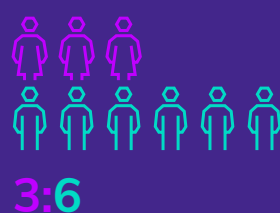
## Age



## Diversity



## Gender



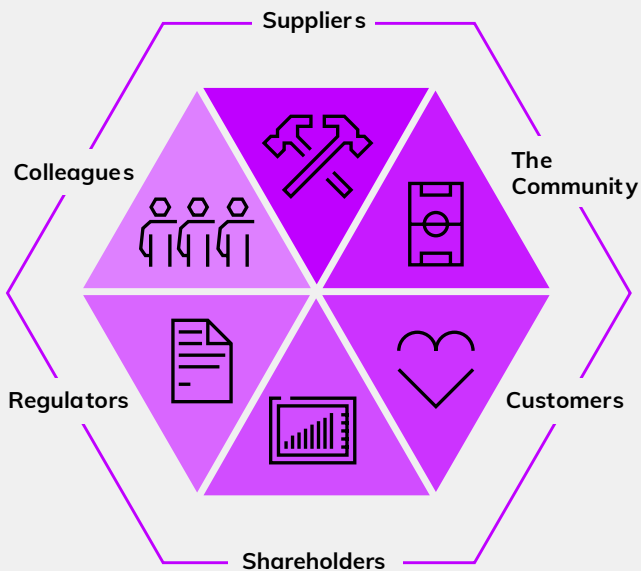


## Board activities and stakeholder engagement

Entain’s purpose is to bring moments of excitement into people’s lives. Over the year, the Board sought to promote our purpose and strategy and made decisions in the interests of all stakeholders, having considered the matters set out in section 172 of the Companies Act 2006 (UK).

### Stakeholders

The Board has responsibility for leading Entain’s stakeholder engagement and considering the implications of key decisions on the business and its stakeholders. The Board recognises that effective engagement with our stakeholders will drive long-term value creation, making Entain a company that people want to invest in, buy from, partner with and work for. Entain has identified six stakeholders that are considered in Board discussions and deliberations on strategy.



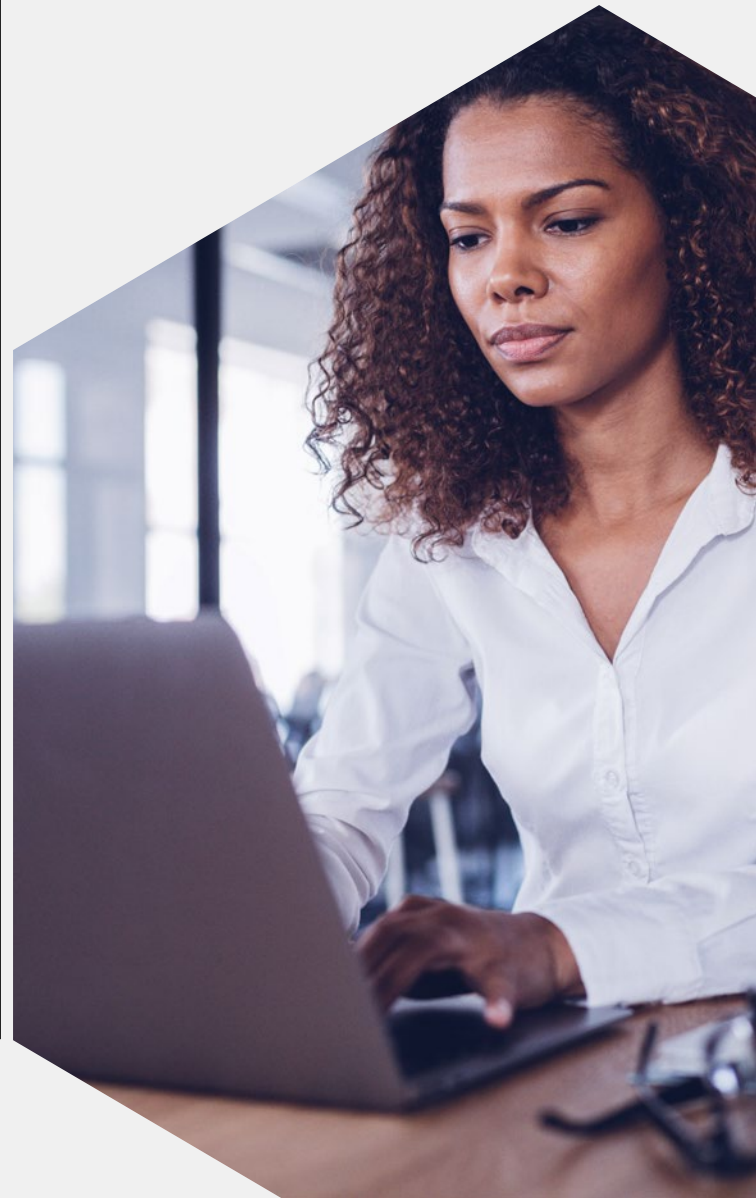
During the year, the Board gave regard to the differing needs of its stakeholders in its decision-making, recognising that the global pandemic had impacted their interests and views – supporting our people, suppliers, customers, and communities.

### Colleagues

Employee forums exist in many of the locations in which we operate. The forums enable our people to discuss and agree on how their teams connect with Entain’s purpose, strategy and values, as well as discuss topics that impact them and their colleagues. Our Employee forums form a key part of our employee listening and engagement strategy. In 2022, discussions were held regarding rewards, in particular the level of pay within Retail. Local forums shared their feedback and management ensured this was incorporated into the decision-making process.

Each forum meets on a quarterly basis, with an AGM held with all forums and the Board on an annual basis. In addition, an annual Global Conference is held where locations without an employee forum have the chance to engage with the Board.

Virginia McDowell, in her capacity as Designated Workforce Director, remains a regular attendee at Employee Forums, enabling her to provide the Board (and its Committees) with informed feedback and insight into the realities of everyday working life at Entain.



## Employee Forum Global Conference

Entain's Global Conference was attended by two Board directors, Virginia McDowell and Senior Independent Director, Stella David, together with 40 employees representing 19 countries.

The Conference considered a wide range of topics including business strategy and performance, regulatory/safer gambling, staff retention, global mobility of employees, M&A strategy, Retail, Sustainability, Diversity, Equality and Inclusion and Well-being, and the steps being taken by the business to support employees through the prevailing difficult economic environment. The Conference generated a number of takeaways for management to consider, particularly regarding Entain's ESG strategy, our products, and employee development and retention.

A video recording of the Global Conference was posted on the Company's intranet to ensure that all employees have an opportunity to watch the discussion.



The Conference considered a wide range of topics ... and the steps being taken by the business to support employees through the prevailing difficult economic environment."

## Shareholders

The Board receives feedback on shareholder views in different ways, including through the Chairman and executive management who meet regularly with shareholders throughout the year, as well as an investor study compiled by an independent third party. Board members listen in to results and trading updates held by the Group for analysts and institutional investors and can directly hear the questions and comments on Company performance.

During the year, the Remuneration Committee consulted with institutional shareholders on proposals for a new Remuneration Policy. A consultation letter was sent to our forty largest shareholders, plus the main proxy advisors, and feedback was received from 17 institutions. The Chair of the Remuneration Committee, Senior Independent Director and members of the Remuneration Committee attended consultation meetings with investors and proxy advisors, and the feedback from these meetings was shared with the wider Board.

In October 2022, we held our second sustainability showcase, Entain: Sustain, attended by shareholders, regulators, legislators, and media, as well as industry stakeholders and partners. This demonstrated our commitment to ESG, and we announced the roll-out of our award-winning safer gaming programme ARC™ to 22 of our global markets, and our new returnship programme with McLaren Racing. The event was attended by our Chief Executive Jette Nygaard-Andersen, ESG Committee Chair Virginia McDowell, Chief Governance Officer Robert Hoskin and Senior Independent Director Stella David alongside other ExCo members.

## Employee Forum AGM

The Employee Forum AGM provides an opportunity for representatives from each of our five Employee Forums to present their highlights and key achievements of the past year and their key aims for 2023. It facilitates a two-way dialogue between the employees and the representatives of the Board. Virginia McDowell attended the Employee Forum AGM together with Mark Gregory, a former Non-Executive Director and Chair of the Remuneration Committee. The AGM was attended by 70 employees.

The presentations from each Employee Forum shone a light on the effectiveness of the Employee Forums as a means of raising key issues and implementing initiatives to drive positive change within the business. The presentations were followed by a Q&A session during which topics such as employee well-being, training and development, HR reporting systems, employee benefits, the Group Policy Framework and Entain's People Strategy were discussed. A number of proposals were taken away by the representatives of the Board for further consideration.

These events enable the Board to:

- Understand how the business strategy has been translated and implemented into everyday working practices.
- Gauge the degree to which Entain's values have been culturally embedded.
- Understand what really matters to our colleagues.
- Engage with our colleagues in open, honest and candid conversations.



## Board training and effectiveness

The Chairman has overall responsibility for ensuring that Directors receive suitable training to enable them to carry out their duties. Training is also provided by way of reports and presentations prepared for each Board meeting, as well as meetings with Entain's employees and external advisers.

In 2022, the Board received face-to-face training on the Criminal Finance Act and AntiBribery and Corruption legislation and on developments in climate change reporting, including TCFD. The Directors have access to independent professional advice at the Group's expense, as well as the advice and services of the Company Secretary, who advises the Board on regulatory and corporate governance matters.

### Board Evaluation and Effectiveness

The Chairman is also assisted by the Company Secretary in providing all new Directors with a comprehensive induction programme on joining the Board. The induction programme provides new Directors with an understanding of their duties as Directors, the Group, its businesses and the markets and regulatory environments in which it operates. This includes meeting with senior executives and their direct reports. The programme also provides an overview of Entain's governance practices.

The 2022 Board evaluation was undertaken through online questionnaires facilitated by Lintstock, an external evaluation provider. Lintstock reviewed and summarised the questionnaire responses, sharing these with the Chairman and Committee Chairs before discussions were held at the Board and Committees on the themes arising from the evaluation. In parallel, the Senior Independent Director facilitated the performance review of the Chairman, holding a discussion with the Board (without the Chairman present) where the results were reviewed and considered. The Senior Independent Director discussed the results directly with the Chairman. The Chairman held reviews of each Director's performance using individual questionnaires and one-to-one interviews. The 2022 Board review concluded that performance was effective during the year. Areas of priority for 2023 included agenda management, to allow for more time to review Entain's progress on implementing strategy; other actions identified include continued monitoring of succession planning and maintaining focus on technology.

## Alignment of ESG performance and remuneration

The Committee is mindful of the ongoing focus on ESG performance and is pleased with the continued evolution of our annual bonus metrics which highlight how we are working to embed sustainability across all aspects of the business.

As for 2022, we will continue to include two non-financial metrics in our 2023 annual bonus. 15% of the bonus will be based on a safer betting and gaming metric and 5% on a customer metric.

### How will the customer metric work?

We will again use Net Promoter Score ("NPS") to measure performance across our brands with the outcome assessed at group-level. NPS is a customer loyalty and satisfaction metric that companies use to track promoters and detractors, producing a clear measure of an organisation's performance through its customers' eyes. As a metric, it is easily understood by both external stakeholders and employees. It aligns with our strategic direction and the results will enable us to take appropriate actions to improve our customers' experience.

### How will the safer betting and gaming metric work for 2023?

We are keen to continue the evolution of the safer betting and gaming metric by further enhancing our systems and processes and continuing to improve the detection and prevention of problematic play. For 2023:

- Half of the total will relate to the UK market. We will target the usage of our active account management tools amongst risk-assessed online customers and the implementation of our Advanced Responsibility and Care™ ("ARC™") model into our UK Retail business.
- The other half will relate to markets outside the UK. Here we will target the deployment of ARC™ across further markets.
- In addition, to reach the threshold level for payout under this metric, minimum levels of completion of safer betting and gaming and other relevant compulsory training modules must be achieved by our colleagues globally.

### How will we ensure that the safer betting and gaming metric will be robustly measured, reviewed and reflect underlying performance?

To provide our shareholders with comfort that the outcome for the safer betting and gaming metric is robust and appropriate, the ESG Committee will receive input from EPIC Risk Management – the leading independent gambling harm minimisation consultancy – when reviewing and evaluating the delivery against targets.



We are keen to continue the evolution of the safer betting and gaming metric by further enhancing our systems and processes and continuing to improve the detection and prevention of problematic play.”

# Investing in people and communities

Investing in our people and communities is one of the four pillars of our Sustainability Charter. We recognise the importance of recruiting, retaining, and nurturing top talents from diverse backgrounds who are essential to all aspects of our business, including the operation of our Entain Platform. We are aware of our role in limiting global warming to no more than 1.5°C and we have pledged to be Net Zero by no later than 2035. We also contribute to the wider communities in which we operate, supporting community organisations via the Entain Foundation.



## Best place to work

Our goal is to attract, engage and retain the best talent globally, bringing the best thinking to the business from inside and outside of our sector. Talent management remains a principal risk for our business, and we take a holistic approach to address it – creating an inclusive environment that

supports the wellbeing of our colleagues whilst supporting them to grow and learn.

## Everyone's in the Game

Diversity and inclusion are key to our sustainability and success<sup>1</sup>. Our ambition is to make sure Everyone's in The Game, meaning everyone at Entain feels valued, respected, and included and can perform at their best. Inclusion is embedded in everything we do, because we know when we feel respected and heard, we do our best work.

2022 was the first year of our new Diversity, Equity, and Inclusion ("DEI") strategy, underpinned by a key commitment to creating a safe place to work. We proactively listened to our people to shape our DEI plan, leveraging the nine employee forums across our global operations and the results of our 2022 Your Voice employee engagement survey. We also hosted numerous listening groups with female colleagues across our locations to understand the barriers they face in the workplace.

We boosted our efforts in educating colleagues on how to create an inclusive culture. Building on the senior leadership training delivered in 2021, we introduced our first Global Inclusion Learning programme, accessible to everyone at Entain. The course is based on real-life stories of our colleagues and covers topics such as inclusive language, allyship, and micro-inequities. 9,020 colleagues have already completed the training, including 97% of retail and 58% of office-based staff. On International Women's Day, we also welcomed neuroscientist, Samantha Hernandez, from Roysse Wellbeing to deliver sessions on Conscious Inclusion to 400 colleagues, now available as a self-paced module on our online learning platform.

We continue working to diversify Entain's talent pipelines.

1. Entain is an equal opportunities employer and is committed to ensuring that all our colleagues are treated equally, irrespective of their age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation, or marriage/civil partnership. We comply with all Equal Pay legislations, in the UK and in other markets where we operate.

Our Talent Acquisition team is trained on recruiting inclusively, providing balanced shortlists for roles, and challenging our hiring managers to think differently. We also partner with external organisations that allow us to find diverse candidates and ensure our Job Descriptions and Adverts have all bias removed. This includes Work180, a charity advertising jobs from employers that they recognised as committed to helping women thrive. We have also implemented projects to tackle local issues in different markets. In India, the ReBoot programme supports women returning to work after a career break. We have successfully hired 36 colleagues from the programme to date and we are now expanding the programme to our Manila operations.

We understand the importance of employee networks in providing a safe space for colleagues with a shared identity or experience. This year, we created two groups to enable our female and LGBTQIA+ colleagues to connect and inspire each other. Women@Entain has over 1,000 members, including senior female sponsors across our major locations who are helping to guide and shape the network. Launched in Pride Month, Pride@Entain already counts over 150 members and 360 allies globally.



Our ambition is to make sure Everyone's in The Game, meaning everyone at Entain feels valued, respected and included and can perform at their best."



## Drive Diversity forward with McLaren

We have a passion for driving the conversation around diversity across the industry. In 2022, we announced a new partnership with McLaren Racing to support women returning to the tech sector. Through our joint returnship programme, we aim to help reignite the careers of women returning to roles in STEM (Science, Technology, Engineering and Mathematics), by providing 6 month high quality placements in both businesses.

“Entain and McLaren’s returnship is well considered, with features such as transitional coaching. This shows a clear ambition from both companies to help returners like me transition back into the workforce.”

A returnship applicant



In 2023 we will continue supporting employee networks to help us better engage and advocate for other minority groups at Entain, including the launch of our Global Black Professionals Network.

We are committed to driving the conversation around diversity across the industry. In 2021, we launched EnTrain, a multi-million-pound global programme to promote increased diversity within technology. We have set an ambitious target for EnTrain to positively impact the lives of 1,000,000 people by 2030, and we have worked with organisations including Girls Who Code to reach young women around the world. In 2022, we also announced a partnership with McLaren Racing to launch a brand-new Returnship programme. Through the initiative, we will provide a unique opportunity for skilled, senior women to return to roles in engineering and technology, where they will work on key projects in both organisations and participate in bespoke coaching and networking programmes.

Many of our DEI metrics are showing positive improvements. We are seeing an encouraging increase in the proportion of women in technical roles and revenue-generating roles.

In the UK, our median hourly pay gap in the UK has reduced to 3.2% in 2022 from 5.3%. This compares favourably with the national figure from the Office of National Statistics which quotes the gender pay gap this year, for all employees (full and part-time), at 14.9%.

However, we have also seen a reduction in the proportion of females in our global colleague base. We have identified key areas of the business that are driving this change despite improvements in the gender diversity of some teams, such as trading and customer services. For example, there has been significant growth in specific geographies where there remains an ongoing challenge to recruit diverse talent. We are focused on addressing these issues, and we are confident that the initiatives outlined in this section will start driving positive trends in our key metrics and the wider industry.

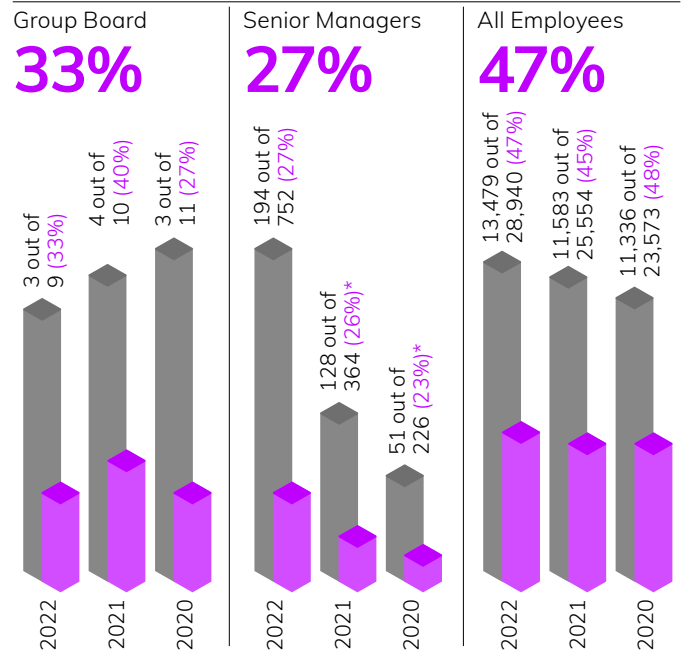
Looking ahead, we want to better understand the demographics of our people so we can drive targeted initiatives addressing the needs of underrepresented groups. For now, we collect voluntary information via our engagement survey. In 2023, we will launch our group-wide campaign to encourage our colleagues to voluntarily disclose on Entain’s internal system. This insight will help shape future activities and drive diversity across our business.



Three of nine (33%) of Entain’s Board are female including our CEO who is one of only nine female CEOs in the FTSE100.”

### Gender Diversity at Entain

Male Female



\* The 2020 and 2021 figures have been restated to reflect a change in our calculation methodology.

Diversity at Entain	2022	2021	2020
Employees worldwide	28,940	25,554	23,573
Full-time equivalent (FTE) worldwide <sup>8</sup>	24,194	N/A	N/A
Female employees	13,479	11,583	11,336
% Female employees	47%	45%	48%
Part-time employees <sup>1</sup>	9,754	4,328	2,525
% Part-time employees	34%	17%	11%
Median hourly pay difference between male and female colleagues (Gender Pay Gap) <sup>2</sup>	3%	5%	7%
Mean Hourly pay difference between male and female colleagues (Gender Pay Gap) <sup>2</sup>	17%	16%	15%
Median Bonus pay difference between male and female colleagues <sup>2</sup>	39%	60%	13%
Mean bonus pay difference between male and female colleagues <sup>2</sup>	66%	63%	19%
Females in all management positions (as % of total management workforce) <sup>7</sup>	37%	38%	37.4%
Females in junior management positions (as a % of total junior management workforce) <sup>7</sup>	40%	40%	N/A
Females in technical roles <sup>3,7</sup>	31%	30%	27%
Female managers in revenue-generating functions <sup>4,7</sup>	42%	38%	42%
UK-based employees who have confirmed as being part of an ethnic minority background, as a percentage of UK employees that have been reported their ethnicity <sup>5,7</sup>	14%	18%	19%
UK-based employees who have confirmed as being part of an ethnic minority background <sup>5,7</sup>	7%	10%	9%
UK-based employees with a disability <sup>7</sup>	3%	N/A	N/A
Employee age groups <sup>6,8</sup>			
<30	37%	38%	37.5%
30-50	46%	48%	47.5%
50+	14%	14%	15.0%
Employee contract types <sup>8</sup>			
Permanent <sup>9</sup>	99%	98%	
Fixed-termed <sup>9</sup>	0.1%	1.21%	N/A
Contractors <sup>10</sup>	1.5%	1.78%	

1. Data for 2020 has been restated due to the merging of HR systems and the harmonisation of the definition of part-time employees between these systems.
2. Data covers all UK colleagues. Data is based on a snapshot date of 5 April for the year stated, as per the requirements of the UK's Gender Pay Gap Reporting.
3. Technical colleagues are those employees that roll up to our Chief Technology Officer based on our Business Process Flow Manager.
4. Revenue-generating functions include our digital and retail/stadia functions.
5. This data was based on a sample of 53% of UK-based Entain employees in 2022 that have provided us with their ethnicity information. To prevent us from over- or understating the ethnic diversity of our employees, we report this data in two ways. We report on both the percentage of the sample that identifies as being from ethnic minority backgrounds, as well as the number of those confirmed to be identifying as from an ethnic minority background as a proportion of all UK employees.
6. Data covers 97% of employees.
7. Data does not include employees in the three businesses acquired by Entain on 23/11/2022: SuperSport, Puni Broj, and Minus 5.
8. Data has been updated from the 2022 annual report to include employees from SuperSport, Puni Broj, and Minus 5. Data does not include employees from SuperSport, Puni Broj, and Minus 5 who have left the business between 1/01/2023 and 31/04/2023.
9. As a percentage of the total number of employees excluding contractors.
10. As a percentage of the total number of employees.

## Our employees by countries





**Well-Me: Wellbeing at Entain**

The delivery of our Well-Me strategy went from strength to strength in 2022, as we further embedded wellbeing in every aspect of the employee lifecycle, from recruitment and onboarding to rewards and development.

We took an important step by launching Entain's first-ever global

wellbeing survey. In partnership with wellbeing specialists at Robertson Cooper, we conducted a comprehensive health and wellbeing assessment including leader interviews, focus groups, and a global survey completed by 9,600 colleagues. The insights we gained are now guiding us to offer tailored and targeted wellbeing solutions across our different markets.

**400,000**

**views and interactions from our 11 global campaigns on a variety of wellbeing topics**

Our Global Wellbeing Network expanded across our offices to 16 wellbeing leads, who are helping us to shape our wellbeing agenda and adapt it to local contexts. Together we ran 11 global wellbeing campaigns achieving 400,000 views and interactions, a 300% increase on that achieved in 2021. On World Mental Health Day, we hosted our first global hybrid event in partnership with Dr Nick Taylor and Leon Taylor – an opportunity for 1,200 colleagues, in person and online, to reflect on their mental health. Throughout the year, we engaged our colleagues on various wellbeing issues including healthy eating, avoiding burnout, financial wellbeing and resilience.

Our Employee Assistance Programme ("EAP") remains a major source of support for our colleagues, with 10% of colleagues utilising it in 2022 (a 2% increase from 2021 and a high take-up rate when compared to similar-sized companies). We provide 24/7 access to our employee assistance programme and the Unmind platform to all employees globally. Last year we continued the roll-out of our Mental Health First Aid ("MHFA") programme, with special attention this year to our 'frontline' people who are providing support to colleagues and customers who are potentially at greater risk of experiencing mental health issues.



"In my role, I have made great relationships with colleagues across our retail business over many years. Some of them have turned to me when times have been tough. Being a Mental Health First Aider supports my existing knowledge and gives others a safe space to talk to someone... someone who really cares."

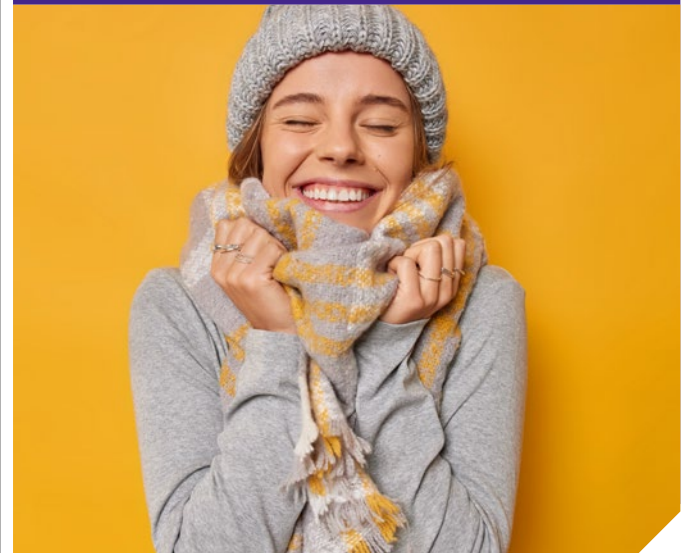
**Claire Brown**  
Operational Assurance Manager

Through our new Support the Support programme, we provided MHFA and Suicide Prevention training to all frontline colleagues across Retail, Human Resources, Safety Management, Employee Relations, Customer Care. We also launched The Workplace of Tomorrow, a targeted training for people managers in our retail shops and stadia, upskilling them to support their teams and create a positive work culture. We will continue delivering the programme in 2023 to reach 1,800 managers.

We achieved important milestones in 2022 in the delivery of our Future of the Office programme – a strategic review of our working practices, responding to the new needs of our colleagues following the COVID-19 pandemic. Throughout the year, we redesigned our offices in London, Lisbon, Manila, and Sofia to suit the new hybrid ways of work and offer more collaborative spaces. Our office in One Stratford Place in London achieved the silver Fitwel certification which recognises buildings optimised to improve health and productivity. In 2023, we will continue expanding the programme across our global operations.

**Warming Up for Winter**

The end of 2022 was a challenging time for many families who struggled to pay their bills amidst surging inflation. To ease the pressure that rising costs of living are placing on our people we launched a campaign called "Warming up for Winter" which supported 13,500 colleagues working in lower-paid roles in our UK shops and stadia. The programme includes a mix of financial help, educational campaigns, and emotional support. Each colleague received £300 of shopping vouchers at the end of 2022. We also offered in-store promotions with daily Christmas giveaways to hundreds of colleagues and organised a gift bank with an unwanted presents giveaway scheme. We ran awareness campaigns, providing practical money-saving tips through podcasts and home-delivered handbooks, and a cooking channel created by our colleagues. We offered financial and wellbeing training to help people budget and protect their mental health during difficult times. From 1 January 2023, we increased the minimum hourly rate of pay to £10.90 (up from £10.00).



### Committed to Colleague development

In 2022, we invested £2.2 million to support the personal and professional development of our colleagues<sup>1</sup>. We boosted the offer available on Learning Room, our learning platform accessible to all colleagues globally. We increased access and licenses to best-in-class learning resources, such as LinkedIn Learning, Get Abstract, and Pluralsight.

## £2.2 million

invested to support the personal and professional development of our colleagues

We delivered important milestones in harmonising the way people learn and grow at Entain. We continue encouraging the adoption of Entain & Perform, a platform enabling colleagues to capture their goals, learnings, career conversations, and reviews. We worked across our global operations to standardise our onboarding process and ensure all new hires are set up for success. We also launched our first-ever company-wide Talent Review Process, to help us identify and retain our top talent and, when necessary, build external pipelines for critical roles. We launched a job architecture framework which will provide our colleagues with a clear pathway to progress their careers, both vertically and laterally.

We remain committed to apprenticeships as one of the most effective tools for social mobility. In the UK, we used our apprenticeship levy to support 58 apprentices, including 20 level-2 apprentices and 27 level-3 apprentices.

1. In 2021, we more than doubled our Learning & Development investment to support colleagues throughout the pandemic, with special attention to retail employees placed on furlough. In 2022, we maintained our investment above pre-pandemic levels whilst shaping our new strategy.

2. Data covers UK retail colleagues only

3. We measure employee engagement based on the results of the annual Your Voice survey. Entain could not run the Survey in 2020 due to the COVID-19 pandemic and our employee communication being focused on wellbeing. Our 2022 score is based on the results of our latest Survey run in April 2022, and the 2021 score on the results of the Survey run in February 2021.

4. The 2020 figure has been restated to reflect a change in our calculation methodology.

5. Data does not include employees from the three businesses acquired in November 2022: SuperSport, Puni Broj, and Minus 5.

6. This includes incidents of discrimination.

Best Place to Work performance indicators	2022	2021	2020
Customer Satisfaction	60%	60%	60%
Central L&D investment	£2.2m	£2.6m	£1.2m
Average hours per employee of training and development <sup>5</sup>	8.1 hrs	10.5 hrs	N/A
Average amount spent per employee on training and development <sup>5</sup>	£81	£116	N/A
Average hours per manager of training and development <sup>5</sup>	22.2 hrs	38.5 hrs	N/A
Average amount spent per manager on training and development <sup>5</sup>	£110	£557	N/A
Employee turnover-all <sup>5</sup>	36%	32%	26%
Employee turnover-voluntary <sup>5</sup>	27%	25%	17%
Employee turnover by gender <sup>5</sup>			
Male	37%	N/A	N/A
Female	35%		
Employee turnover by age groups <sup>5</sup>			
<30	52%		
30-50	30%	N/A	N/A
50+	20%		
Employee turnover by ethnic groups <sup>5</sup>			
Asian	25%		
Black	29%		
Mixed	49%		
Not stated	34%	N/A	N/A
Other	17%		
White	44%		
Whistleblowing incidents reported and investigated <sup>5</sup>	51	29	34
Whistleblowing incidents reported and investigated, broken down by topics <sup>5</sup>			
Fraud & Theft	5		
Code of Conduct <sup>6</sup>	23		
Procedural Non-Compliances	12	N/A	N/A
HSSE	3		
HR Grievance	7		
Not provided	1		
Employee accidents <sup>5</sup>	112	117	137
Employee reportable incidents <sup>5</sup>	7	5	4
Public accidents <sup>5</sup>	11	9	31
Public reportable incidents <sup>5</sup>	1	1	0
Absenteeism rate <sup>2, 5</sup>	5%	4%	3.51%
% of internal hires <sup>2, 5</sup>	19%	35%	26%
Employee engagement index (% of employees recommending Entain as a place to work) <sup>3</sup>	74%	78%	N/A



**Employee Remuneration & Reward**

As well as supporting the development of our people, we are committed to providing a competitive rewards package for each employee across all levels. We also want to share the success of the business with our colleagues. In 2022, we expanded our all-employee ShareSave plan from 14 countries to 23 countries, covering over 90% of employees globally. We also awarded free shares worth £300 to all colleagues. In addition, approximately 13,000 colleagues globally are included in our performance-based bonus plans. We also understand that reward goes beyond just salary. In our top-six countries by colleague numbers (covering nearly 90% of employees globally), we offer at least one of the following non-salary benefits to all colleagues: Employer pension contributions, life cover, medical insurance, and income protection insurance. In other countries where we operate, we offer other non-salary benefits to match the expectations of the local employment market.

**over 90%**  
of employees covered in our all-employee ShareSave plan

**The Big Six Compliance Programme**

As a FTSE100 company, we have a duty to do the right thing. This also means training our people to always make the right decision for our customers and our communities. Every colleague<sup>1</sup>, no matter their role, level, or location, must complete six learning modules covering ethical topics such as safer gambling, data privacy, or bribery and corruption prevention.

With the Big Six programme, we wanted to drive completion rates for our mandatory training across Entain. We linked our 2022 Group Bonus to achieving 85% of completion for each module – an ambitious but achievable target given the turnover in certain parts of our business. Our Compliance Team also refreshed the training based on the feedback from our colleagues. Working hard with other departments, they made the modules insightful, easy to follow, and clear to understand.

The first year of the programme was a success, as we increased our average completion rate to 93% – up from 82% in 2021.

Big Six Learning Modules	Completion Rate
Code of Conduct (including Safer Gambling)	98%
Cybersecurity Awareness	96%
Data Privacy	94%
Governance, Risk and Compliance	96%
Prevention of Bribery, Corruption and Tax Evasion	97%
Modern Slavery	91%

1. The Big Six Compliance Programme also covered our contractors and agency staff.

**Sustainable Supply Chain**

We are committed to acting morally, honestly, openly and with integrity in everything we do. We firmly believe that a robust approach to protecting human rights and preventing Modern Slavery is one way we can evidence this.

We have identified that the two main potential risk areas for our business are the recruitment and onboarding of staff and our broader supply chain. In 2022, we continued our collaboration with Unseen, a UK-based charity fighting modern slavery, to strengthen our procurement processes and policies. Unseen also helped us complete a risk assessment of our suppliers, mapping areas where modern slavery could be more prevalent based on factors such as purchasing category or political instability. We used the results of this exercise to identify high-risk suppliers and send them a new supplier questionnaire prepared by Unseen. In 2023, we will require external audits for suppliers scoring as high risk based on their questionnaire responses. Our ambition is to repeat this exercise every two years. We will also release in 2023 a Group Modern Slavery Strategy, which will outline our plans to better understand and tackle the risks in our recruitment processes.

In addition to protecting human rights, we are also working with our suppliers to understand and reduce emissions throughout our value chain. In 2021, we conducted a screening assessment of our scope 3 emissions with the Carbon Trust. In 2022, we surveyed and actively engaged with 19 suppliers that represent 33% of those emissions. We completed site visits with strategic suppliers to better understand how they can support our Net Zero by 2035 agenda.

In early 2023, we took an important step by partnering with EcoVadis, the world’s largest platform for supplier sustainability ratings. Our EcoVadis membership will help us evaluate our key suppliers and their training needs across four topics – environment, labour and human rights, ethics, and sustainable procurement. The platform will also help us refine our Net Zero roadmap by giving us access to primary emission data from our suppliers.

 We are very excited to be working with Entain to accelerate their sustainability journey in the sport, gaming and interactive entertainment value chain.

Our partnership began in February '23 and the team is on the right track setting up their programme for success with a clear roadmap for integrating sustainability into their purchasing and business decisions. Going beyond initial quick wins for accessing scorecards of suppliers already in the EcoVadis network, to the broader supplier roll-out strategy with a target of covering 75% of Entain’s global spend by 2025. We are looking forward to working with them every step of the way.”

**Jamie Jarczewski**  
Senior Customer Onboarding Manager at EcoVadis

In 2023 our procurement and diversity teams will also collaborate to develop a Supply Chain Diversity Roadmap. Our ambition is to increase the number of Entain’s suppliers that are owned by people from historically underrepresented groups. In 2022, the Group spent £2.7bn across more than 9,600 suppliers. By changing our purchasing practices, we believe we can make a difference in the communities where we operate whilst increasing our supply chain resilience and agility.

2. For this risk assessment, we include all suppliers with which we spend over £50,000 per year.

## Data privacy and cybersecurity

Safeguarding our corporate and customer information remains a top priority for Entain. Our commitment is reflected in the growing headcount of our Data Privacy and Cybersecurity teams, which respectively employ 21 and 39.5 full-time equivalents. We have implemented strong governance procedures, with our Chief Privacy Officer (who also holds the position of Group Data Protection Officer) and our Chief Security Officer providing regular updates to the Board and Executive Committee.

2022 was an important year in taking our privacy strategy to higher stages of maturity. We rolled out a new assurance programme, with dedicated staff members and tools to control and monitor the effectiveness of our data privacy activities, keep risks under review, and update policies and procedures in line with new legislation. As part of the programme, we carried out 20 Data Protection Impact Assessments (DPIAs) in 2022<sup>1</sup> and issued over 500 supplier due diligence assessments in 2022 – up by nearly 25% from 2021.

# 25%

### increase in supplier due diligence assessments in 2022

We completed the annual review of our Group-wide Data Protection and Data Retention policies, which apply to everyone working for Entain, including agency staff and contractors. As part of the Big Six Programme, 95% of our colleagues completed the annual mandatory Data Privacy training.

We made progress on the implementation of our Artificial Intelligence (AI) and Data Ethics Charter, which defines our principles on the responsible use of data-driven technologies. Whilst we use AI and deep machine learning to create a safer environment for our players, we also have a duty to meet their privacy expectations and we're working hard to strike that balance. Data privacy is built into the development of our safer betting and gaming initiatives, including in our new ARC™ programme. Our data privacy experts are part of the ARC™ Steering Committee, through which they provide technical guidance to the safer betting and gaming and customer services teams.

We launched a new Mergers & Acquisitions ("M&A") Security Policy to support the safe integration of acquired companies and joint ventures. We reinforced cybersecurity and privacy verifications as part of the M&A due diligence. We also accelerated the incorporation process, as all businesses joining the Group must align with our requirements within six months. In 2022, our privacy and cybersecurity experts supported the technological integration of 12 new subsidiaries.

Our privacy and cybersecurity teams are also involved in third-party due diligence. Entain is relying on a growing number of suppliers to deliver its online products, and it has become increasingly important to ensure these third parties meet our data privacy and security standards. Before we start working with a new tech partner, we evaluate the risks and controls in place – either by reviewing existing certification and external audit information or by conducting our own assessment. We then include our data privacy and security recommendations in contractual agreements which are only executed once the third party has agreed to meet our requirements.

1. DPIAs are comprehensive privacy risk assessments, a requirement under the General Data Protection Regulation (GDPR). We undertake DPIA for projects or processes involving personal data and meeting a certain risk threshold. For each assessment, our Data Protection Officers will make a recommendation to the business, which may include suggestions and actions to mitigate any high risks. The DPIA will then be logged and given a risk rating of 'High,' 'Medium' or 'Low', which will determine how frequently the processing will be reviewed by our data privacy team.

## Contributing to the economies where we operate

The Group employs a significant number of people across c.4,270 retail outlets and offices in more than 20 territories. As such, our economic footprint is significant. In 2022, we paid £1.2bn in taxes and levies across our countries of operation. This comes in addition to the £654.5m we paid in employee wages and salaries and the £2.7 billion we paid to our 9,600 suppliers and third-party partners.

# £1.2bn

### paid in taxes and levies across our countries of operation

Economic contributions	2022	2021	2020
Net gaming revenue	£4,348.9m	£3,886.3m	£3,628.5m
Underlying EBITDA	£993.2m	£881.7m	£843.1m
Total tax paid	£1.272m	£1.055m	£962m
Employee wages and salaries	£654.5m	£579.1m	£524.0m
Payments to providers of capital (interest & dividends)	£126.2m	£63.9m	£62.8m
Supplier Spend	£2.7bn	£2.1bn	£1.3bn





## Entain Foundation

We originally launched the Entain Foundation (“the Foundation”) in September 2019 to help deliver the Group’s ambition to take the lead on safer betting and gaming and support the communities in which we operate. In addition to our main global Foundation, we also operate

the Entain Foundation US, a dedicated US-based not-for-profit. In November 2020, the Entain Foundation committed to investing £100m in good causes over five years. This commitment included our voluntary contribution to UK Gambling Commission approved

Research, Education and Treatment (“RET”) providers. With the UK’s Gambling Act Review recommending a move to a compulsory levy on UK Gross Gaming Yield (subject to consultation), we are reviewing the financial commitment of the Group’s Foundation going forward.

The work of the Foundation supports the Group’s pioneering Sustainability Charter and wider ESG initiatives and plays an integral role in delivering against the Charter’s pillars of People and Communities, and Responsibility. The Foundation’s key areas of focus are safer betting and gaming, grassroots sports, diversity in technology and projects with a clear link to the communities in which we operate. If you would like to learn more, we invite you to review our 2022 Social Impact Report, available from [entaingroup.com](http://entaingroup.com).

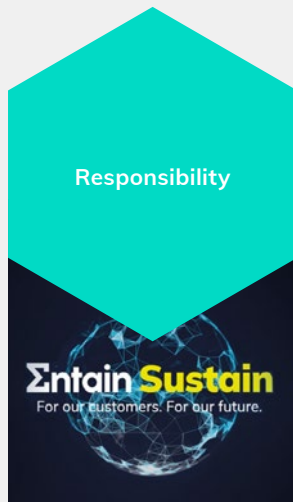
### How our social impact focus supports the Entain Sustainability Charter

Entain group sustainability charter



**Regulation**

**Only operate in domestically regulated and regulating markets.**



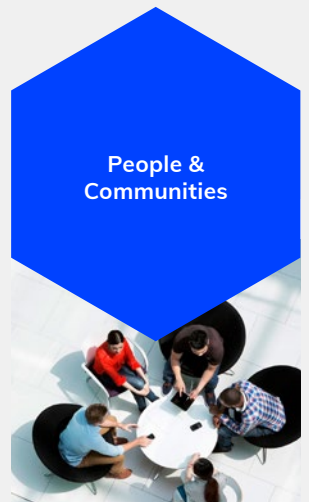
**Responsibility**

**Taking the lead on responsible betting and gaming.**



**Corporate Governance**

**Best-in-class standards of corporate governance.**



**People & Communities**

**Creating the best place to work, net-zero emissions by 2035, and support the communities where we operate.**

Social impact areas of focus



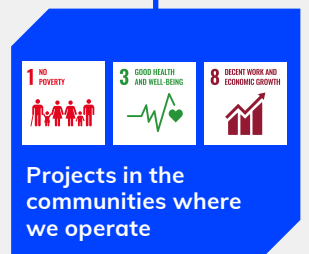
**Safer betting and gaming**



**Grassroots, women's and disability sports**



**Diversity in technology**



**Projects in the communities where we operate**

Why it matters

We support partner organisations that are engaged in research, education and treatment of problem gambling to bolster our internal Changing for the Better safer betting and gaming strategy.

Sports and sports betting are what we do. We give back by supporting the next crop of athletes, and work with organisations that are making sport inclusive to bring everyone into the game.

As a technology company at heart, we are supporting organisations that are working with young people that may currently be underrepresented in the tech talent pool. Promoting tech careers and ensuring that the future talent pipeline is inclusive, making sure that Everyone’s in the Game.

Our operations are truly global – embedded in communities in more than 15 countries.



### Focus on safer betting and gaming

The Foundation's top priority is to promote safer betting and gaming, in line with Entain's Changing for the Better strategy. We work with partner organisations across three key focus areas.



- Research papers
- Building credible institutions
- Generating interest in advance methods of gambling research
- Using findings in our own operations

- Support and assessments
- Intensive treatment
- Improving retention



- Training
- Outreach and awareness training
- Signposting to high-quality resources

As part of our operations in the UK, in 2022, we contributed 0.75% of GGY to GambleAware to support RET associated with problem gambling – up from 0.5% in 2021. In 2023, we will increase this proportion to 1%, a significantly higher figure than the minimum voluntary requirement of 0.1% and in line with the UK Government's Gambling Act Review proposal.

In addition to these contributions, we work with a range of organisations that are leading ground-breaking safer betting and gaming initiatives and research. We also leverage the expertise of

our academic partners to ensure our own player protection culture, processes and decisions are informed by scientific research and lived experience. Over five years, we will have invested over £100m in our partner organisations and charities through the Entain Foundation.

## £100m+

will have been invested in our partner organisations and charities through the Entain Foundation by the end of 2026



### Promoting grassroots sports

As a business, Entain is passionate about sports and understands the role it plays in society. That is why we are proud we can make an impactful contribution by investing at the grassroots level.

The Foundation currently supports two key flagship projects in the UK as well as initiatives in Greece and Colombia.

#### SportsAid

Entain has been partnered with SportsAid since 2018. SportsAid is the only national charity in the UK of its kind, helping young British athletes aspiring to be the country's next Olympic, Paralympic, Commonwealth and world champions. Entain has helped over 200 athletes since the partnership began in 2019 by providing them with a financial award to help with training, equipment, and competition costs, as well as personal development training. We have extended our long-term partnership with SportsAid through to the Paris 2024 Olympic and Paralympic Games, doubling the financial backing made thus far and increasing our total commitment to around £500,000 by 2024.

#### Pitching In

Pitching In is an Entain initiative to support and develop grassroots sports in the UK, helping non-league clubs improve their facilities and providing a platform for aspiring athletes to chase their dreams. The multi-million-pound, multi-year investment programme is working with Isthmian, Northern Premier and Southern League clubs (known as the Trident Leagues) to champion their achievements and tell their stories. The Pitching In partnership has been designed from the ground up to deepen links between clubs and their local communities. In May 2022, Entain unveiled the Pitching In Volunteer Hub, a new online portal that has become a one-stop-shop for every Trident League club to connect football fans with potential volunteers.



### Meet Alice Casburn, part of Entain's 2023 athlete cohort

The equestrian Alice Casburn is one of 50 athletes supported by Entain in 2023. Alice and her ride Topspin made a successful debut at the Badminton horse trials last year. The pair was 19th winning Alice, who was the youngest rider competing, the highest placed 'under 25' and the Glentool trophy for the 'highest rise up the leader board after dressage'.

“Entain’s support is really important to me. It helps you mentally, having that financial pressure taken off you - because you’ve got so many things to think about. And to know that someone else has recognised your achievements also gives you that extra push.”

Alice Casburn, Equestrian



#### Tiempo de Juego

Tiempo de Juego is a non-profit organisation based in Colombia whose goal is to use sports, culture, and technology as mechanisms to improve the quality of life and health of children at risk in different regions of the country. Thanks to their partnership with Entain, the charity was able to create a competitive female football team “Cazucá Futbol Club”. This team opens the possibility for more than 30 girls from Soacha to dream their future as professional football players, while learning about gender issues and life skills.

#### Sport Senze Frontiere

Sport Senze Frontiere supports underprivileged young people and their families in cities and towns across Italy, through the provision of community sports and tutoring. Entain funds SSF’s intervention programme, which provides young people with school and tutoring services, counselling, health education and medical support. The project aims to reach a total of 400 individuals in Naples, Rome, Milan, Turin, Bergamo and Trento.



### Promoting diversity in technology

In 2021, we launched EnTrain, a global programme to promote increased access to, and diversity within, technology through training and education. We have set an ambitious target for EnTrain to positively impact

the lives of one million people around the world – either directly or through their families and dependants – by 2030.

Since the programme launched 50 Entain employees have engaged in our three apprenticeship talent pathways, and we’ve supported more than 3,000 girls in coding clubs through our charity partner Girls Who Code.

#### Our Returnship Programme with McLaren Racing

We believe companies like ours have an opportunity to reshape the world of work when it comes to female representation. In 2022, we partnered with McLaren Racing to launch a brand-new Returnship programme. Through the initiative, we will provide a unique opportunity for skilled, women to return to roles in engineering and technology, where they will work on key projects in both organisations and participate in bespoke coaching and networking programmes via a 6 month high quality programme across both businesses.

#### Girls Who Code

Girls Who Code is an international non-profit organisation working to close the gender gap in technology and change the image of what a programmer looks like and does. Over the past 10 years of their programmes, Girls Who Code has served half a million girls, women, and nonbinary individuals, half of whom are from groups underrepresented in tech including Black, Latinx, and low-income. With Entain’s support, Girls Who Code reached 10,680 individuals through 890 Clubs over the academic years 2021/22 and 2022/23 so far.

# 10,680

individuals were reached through 890 Girls who Code Clubs with the support of Entain



## Supporting communities

Entain is a global business and as such, we seek to support local communities in the markets where we operate. The Foundation supports a variety of small to mid-sized charities in countries where we can make a positive social or environmental impact. Our partners include Chance for Childhood (various African countries), ComputerAid and Turing Trust (Kenya), Sport Senza Frontiere (Italy), Tiempo de Juego (Columbia), and Fejar (Spain). If you would like to learn more about the difference we make with our partners, we invite you to review our 2022 Social Impact Report available at [entaingroup.com](https://entaingroup.com).

### Ukraine

Following the Russian invasion of Ukraine in February 2022, Entain responded to the Ukrainian Ministry of Health's appeal for support with an immediate donation via its Foundation to Crown Agents, the not-for-profit international development company. The donation was used to supply a variety of life-saving medical equipment. Our Baltics-based business, Enlabs, also made donations directly to the relief efforts and throughout our business, and many of our colleagues organised collections to provide both financial donations and supplies for the relief efforts. We also recognised the need to support the many Ukrainian national colleagues within our Group, as well as those with friends and relatives affected by war, encouraging all to take advantage of our 24/7 Employee Assistance Programme.



Entain responded to the Ukrainian Ministry of Health's appeal for support with an immediate donation via its Foundation to Crown Agents."



## Reduced environmental impact

2022 was an important year for Entain as we set in motion our Net Zero by 2035 plan. After achieving our greenhouse gas (GHG) emissions reduction target in 2021, we are now focused on achieving our new 'near term' science-based targets.

We have committed to a reduction of 29.4% in our scope 1, 2 and 3 emissions by 2027 from a 2020 baseline year. This has been submitted to the Science-based Targets initiative to ensure our journey to decarbonisation is in line with limiting global warming to 1.5 degrees, as per the Paris Agreement.



# 29.4%\*

committed reduction in our scope 1, 2 and 3 emissions by 2027 from a 2020 baseline year

Our Net Zero Action Group plays a central role in accelerating our decarbonisation strategy. The Action Group convenes senior colleagues across departments to identify practical measures which can be implemented throughout our global operations. This year, the Committee oversaw a series of workshops held with senior leaders across the business to identify climate-related risks as well as opportunities for Entain to support the transition to a lower-carbon economy. The outcomes are now helping us to shape our Net Zero action plan.

1. This target has been restated from our 2021 ESG Report as part of our submission to the Science-Based Targets Initiative (SBTi).

**Our operational footprint**

In 2022, we noticed an uptick in our absolute scope 1 and scope 2 emissions, which reflects business growth and the reopening of our offices and retail shops after the COVID-19 lockdown measure. This has been balanced by our continued investment in renewable energy, which has kept our market-based emissions stable. We continue working hard to deliver our scope 1 and scope 2 targets through a three-pillar approach:

- **Switching to Green Energy**

In the UK almost all our electricity supply contracts for our offices, shops and greyhound stadia are from 100% renewable energy. This amounts to nearly 67% of the Group’s total electricity consumption being actively sourced from renewables. In 2022, we secured a Corporate Power Purchase Agreement with SSE until 2027, covering our retail shops and four stadia in the UK. As part of our Net Zero Strategy, we are working with our global operations to switch to renewable electricity in line with the RE100 criteria, where these mechanisms are available.

**Entain secured a Corporate Power Purchase Agreement with SSE**

Switching our electricity supply to renewable sources is an essential part of our Net Zero Strategy. Our UK retail estate has been powered via green tariffs since 2020. But we believe it is also our responsibility as a FTSE100 to support the scaling up of renewable energy generation in the UK. With our new Power Purchase Agreement, we are taking an active role in funding the building of renewable generating systems whilst protecting our business from changing energy prices. The agreement will cover the electricity required to power our retail shops and four stadia in the UK until 2027.



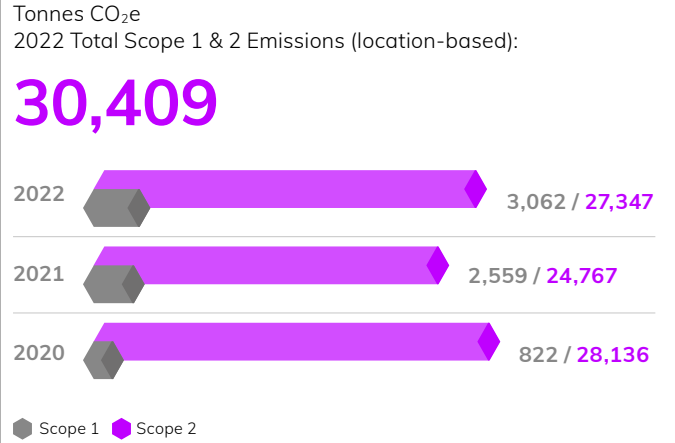
- **Electrifying our operations**

Our Scope 1 emissions are currently driven by the fuel used to power our vehicle fleet and to heat our retail shops and stadia. We plan to drive these emissions to zero by electrifying all our operations. In 2022, we changed our procurement processes to promote electric vehicles. Unless made impossible by local factors, all new vehicles are purchased by default in an electric model with Entain funding for the installation of charging points. We are also committed to electrifying all our heating and cooling systems as part of the roll-out of our shop-refurbishment scheme.

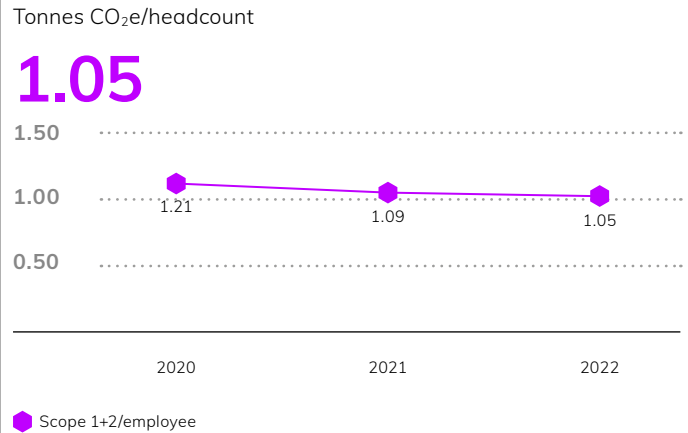
- **Driving energy efficiencies**

We will continue improving energy efficiency in our operations as part of our shop-refurbishment scheme, which includes refitting shops with energy-efficient appliances, lighting, heating, and cooling. We are also engaging colleagues in our decarbonisation strategy, empowering them to deliver on our Net Zero target through everyday interventions.

**Scope 1 and 2 GHG emissions**



**GHG Emissions Intensity**

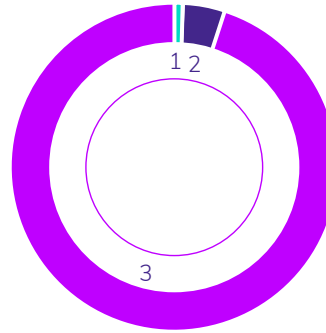


**Our value chain emissions**

Entain’s scope 3 emissions make up 96% of our total value chain emissions. This figure is typical for global companies with a large supplier base, and it means we need to bolster our efforts in engaging our business partners. To do this, we have been aligning our approach to the Carbon Trust Supply Chain Standard, where we currently have Level 1 certification.

Working with the Carbon Trust in 2021, we found that 44% of our emissions are associated with 15 major suppliers. We are now engaging with them to explore how we can reduce emissions together. In 2022, we surveyed 19 key suppliers and completed site visits to better understand their environmental management maturity and tailor future upskilling activities.

In early 2023, we partnered with EcoVadis, an established platform for supplier sustainability ratings. Our membership will help us engage with our wider supplier base and, by giving us access to primary data from suppliers, refine our Net Zero roadmap.



**Our value chain emissions**

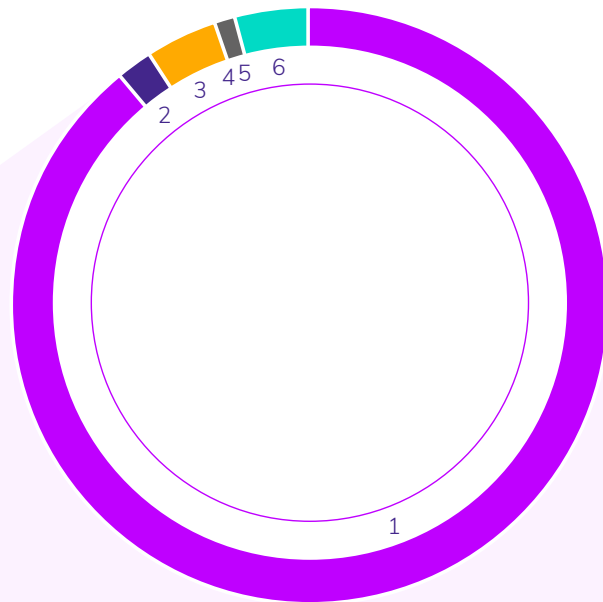
<b>1. Scope 1</b> (natural gas and fuel usage, company vehicles)	0.3%
<b>2. Scope 2</b> (purchased electricity, market based)	4.2%
<b>3. Scope 3</b> (value chain emissions beyond our own operations)	95.5%

Given our growing digital presence, which has led to an increase in the scale of digital services that we procure, we have developed a process to engage our digital infrastructure providers to understand the footprint and sustainability credentials of our suppliers in this area. As such, we are taking the following actions to address our digital and data centre footprint:

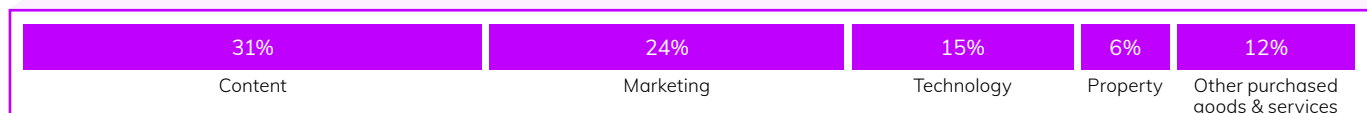
- Sending data requests to our major providers to gather primary data on the emissions that are allocated to the services that we procure.
- Understanding the sustainability credentials that our providers have in place (for example, renewable energy contracts or onsite generation).
- Engaging with providers to identify projects where we can reduce energy consumption in the way we procure services.

**Our Scope 3 emissions**

<b>1. Category 1b</b> Purchased goods & services (non-product)	88%
<b>2. Category 3</b> Fuel & energy related activities	2%
<b>3. Category 4</b> Upstream transportation & distribution	4%
<b>4. Category 5</b> Waste generated in operation	0%
<b>5. Category 6</b> Business travel	1%
<b>6. Category 7</b> Employee commuting	4%



**1. Category 1b**

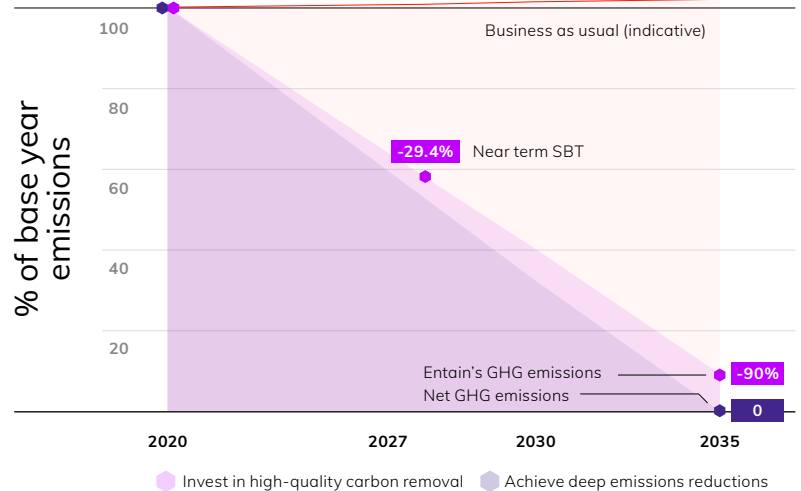
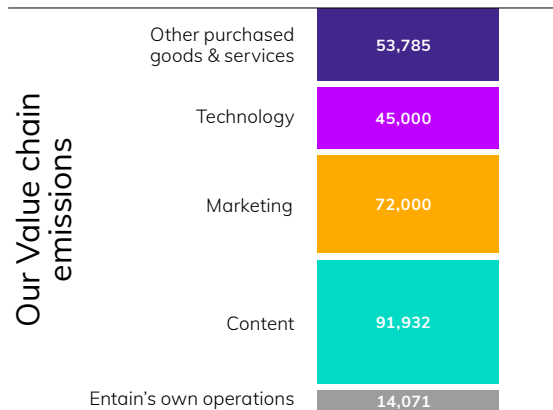




## Our Pathway to Net Zero

Our top priority is to achieve significant reductions in our carbon emissions and those of our suppliers in line with our target of net zero by 2035. However, we know that after these reductions are made, there will be residual emissions that we won't be able to eradicate and we will still need to remove these from the atmosphere. To make an immediate positive impact on people and the planet, we are ramping up our investment in climate mitigation including through our partnership with Brynk, an independent platform supporting global tree planting and reforestation projects.

We are already growing our Entain Forest of 1 million trees with Brynk and will extend that by a further 300,000 trees this year. The purpose of our forest is to sequester carbon (21,000 tonnes of CO<sub>2</sub> forecast by 2032) and provide employment and training for local people as well as localised environmental and social benefits, such as increasing natural biodiversity within the regions. The carbon captured by the Entain Forest will be in addition to the official carbon credits needed by Entain to meet its net zero targets in 2035.



Whilst GHG emissions are our most significant environmental impact, we also measure and look for ways to reduce our waste and water consumption. In 2021, we recycled 59.9% of our waste across our UK retail estate and use 39.9% of it to generate energy, diverting nearly 100% of waste from landfill.

### Environmental KPIs, including Streamlined Energy and Carbon Report (SECR) data<sup>7</sup>



	2022	2021 <sup>1</sup>	2020 <sup>1</sup>
<b>Total energy consumption (kWh)<sup>2</sup></b>	<b>126,457,812</b>	110,509,736	111,755,270
UK	84,508,145	85,336,239	92,776,583
Rest of the world (ROW)	41,949,667	25,173,497	18,978,687
<b>Absolute direct emissions (scope 1) – (tCO<sub>2</sub>e)<sup>4</sup></b>	<b>3,062</b>	2,559	822
<b>Absolute indirect emissions (scope 2, location-based) – (tCO<sub>2</sub>e)<sup>4</sup></b>	<b>27,347</b>	24,767	28,136
<b>% of purchased electricity from renewable sources<sup>3</sup></b>	<b>67%</b>	67%	59%
<b>Absolute GHG emissions – direct and indirect: location based (tCO<sub>2</sub>e)<sup>4,5</sup></b>	<b>30,409</b>	27,326	28,958
UK	15,344	18,286	21,497
Rest of the world	15,065	9,040	7,461
<b>Absolute GHG emissions intensity per employee (tCO<sub>2</sub>e/headcount)</b>	<b>1.05</b>	1.09	1.21
<b>Total GHG emissions – direct and indirect: market based (tCO<sub>2</sub>e)</b>	<b>15,268</b>	15,235	15,065
UK	2,017	4,932	7,640
Rest of the world	13,252	10,304	7,425
<b>Water withdrawal (cubic metres)<sup>5</sup></b>	<b>117,807</b>	100,401	252,345
<b>Waste generated (tonnes)<sup>6</sup></b>	<b>4,624</b>	3,858	7,715







1. Data from previous years has been restated based on minor adjustments that arose as part of Entain's GHG data independent validation by the Carbon Trust.
2. Coverage of energy consumption and emissions data is 100% for the UK, and 88% globally, by employee headcount. Global and ROW energy and emissions data are scaled up based on this coverage to estimate totals across global operations. This data includes energy consumption related to both scope 1 (company vehicles, gas, and fuel) and scope 2 emissions (purchased electricity). Global coverage was reduced this year due to the limited availability of data following acquisitions in the period.
3. Energy from renewable sources only includes electricity purchased that was actively sourced from renewables. All remaining electricity used by Entain is sourced from the local grids where we operate.
4. Emissions are calculated using the GHG Protocol Corporate Accounting and Reporting Standard. Consumption data has been converted to GHG emissions using the 2022 BEIS emissions factors and 2022 IEA emissions factors for non-UK grid electricity. Emissions reported above are calculated using the location-based method, using an operational control boundary.









5. All water withdrawn is sourced from municipal water supplies. Water data includes our operations in the following countries: Austria, Belgium, Bulgaria, Gibraltar, India, Israel, the Philippines, the UK and Uruguay. In 2022, we also included data for our operations in Malta and Latvia. This makes up 80% of Entain's global headcount. Note that this data is not scaled up to estimate the total global consumption but is reported consistently for the operations where data is available.
6. Waste data is sourced from our operations in the UK. This makes up 57% of our overall headcount. These figures are not prorated to 100% coverage. We do not produce radioactive waste. The hazardous waste produced in our operations is de minimis and includes old paint, old fluorescent lighting tubes, waste engine oil, and medical waste. All of it is covered by appropriate hazardous waste consignment notes. Whilst we are unable to obtain the exact weight of our hazardous waste, we estimate it to be less than 0.5% of our total waste.
7. Due to the Group acquiring four new entities in 2022, overall energy consumption and location-based emissions increased in 2022. As integration and data collection from these entities are ongoing, we have revised our 2022 figures upwards based on headcount. We have not yet rebaselined data from previous years based on these new acquisitions whilst we await data from these operations.

# ESG Targets and Objectives

## Key

Achieved	
On track	
Limited progress	

Target / objective	Status	Commentary
<b>Exclusive focus on regulated markets</b>		
Operate exclusively in regulated markets		As of February 2023, 100% of Entain's revenue comes from domestically regulated or regulating markets. Since 2020, we have closed our offering into more than 150 unregulated markets. We remain active in only a small number of regulating markets, where we do not currently hold a domestic licence, but we foresee positive changes in regulation. This includes Brazil, Chile and Peru, countries that are all in the process of rolling out licence regimes in the next 12 to 18 months.
<b>Best in class corporate governance</b>		
Increase our focus on bringing greater diversity to our Board		The proportion of women on the Board remained at 36% as at 31 December 2022, in line with the recommendations of the Hampton Alexander Review. Following Rahul Welde's appointment, as at 31 December 2022, the Board also meets the Parker Review's target of at least one Director from an ethnic minority background. In 2022, the Committee reviewed and recommended the Board Diversity Policy which was subsequently approved by the Board. This can be found on our website at <a href="http://www.entaingroup.com">www.entaingroup.com</a> .
Review Modern Slavery Act Statement and launch a Modern Slavery and Human Rights Strategy		At the end of 2020, our Modern Slavery Working Group, which includes colleagues from Group Procurement, Human Resources, Internal Audit and Company Secretariat, was formed. The Working Group is responsible for producing the annual Modern Slavery Statement and aims to better the visibility of human rights issues, impacts and risks, and identify ways to eradicate adverse effects on human rights within the Entain plc group and extended supply chains. In 2022, the Working Group continued its collaboration with Unseen, a UK-based charity fighting modern slavery, to strengthen our procurement processes and policies. Unseen helped complete a risk assessment of Entain's suppliers, mapping areas where modern slavery could be more prevalent based on factors such as purchasing category or political instability. The results of this exercise were used to identify high-risk suppliers and send them a new supplier questionnaire prepared by Unseen. In 2023, we will require external audits for suppliers scoring as high risk based on their questionnaire responses. We are also working to develop a Group Modern Slavery Strategy, which will outline our plans to better understand and tackle the risks in our recruitment processes..
Enhance colleague governance and compliance training		We rolled out an extensive 'Big Six' training programme covering the Code of Conduct, Prevention of Bribery, Corruption and Tax Evasion, Governance, Risk and Compliance (including anti-money laundering), Modern Slavery, Information Security/ Cyber Security and Data Privacy. This training is mandatory and at least 85% of global colleagues had to complete each module in order to meet the threshold for the ESG element of the annual bonus
<b>Continuing to take the lead on safer betting and gaming</b>		
Tying remuneration to responsibility and customer satisfaction		In 2022, in addition to the continuation of the 15% safer betting and gaming metric, we introduced a metric based on customer satisfaction using a Net Promoter Score, which comprised a further 5% of the bonus assessments. In 2023, We will continue to include these two non-financial metrics in our annual bonus.
Increasing the amount we contribute towards problem gambling research, education and treatment (RET) ten-fold gradually to 1% by 2022 against a 2018 baseline.		As part of our operations in the UK, in 2022, we contributed 0.75% of our Gross Gaming Yield to support Research, Education and Treatment of problem gambling – up from 0.5% in 2021. In 2023, we will increase this proportion to 1%, a significantly higher figure than the minimum voluntary requirement of 0.1% and in line with the UK Government's Gambling Act Review proposal.

Target / objective	Status	Commentary
<b>Continuing to take the lead on safer betting and gaming continued ...</b>		
Pioneering new approaches to transparent reporting on safer betting and gaming, developing robust metrics in partnership with our peers		We continue to expand our reporting on safer betting and gaming, with new KPIs associated with our ARC™ programme (see page 14). During 2022, we saw greater accuracy of our predictive tools, as well as ARC™ being rolled out internationally, with its principles implemented across 22 of our markets by the end of 2022. ARC™ has delivered over 3.7 million proactive interactions in the UK, and our most successful ARC™ model showed a 36% drop in customer risk rating following an intervention, demonstrating that ARC™ is successfully preventing harmful behaviours amongst our customers and helping them to keep their play safe with us.
Developing our partnership with Harvard Medical School to better understand and reduce the potential for problem gambling behaviour through rigorous research		2022 marked the fourth year of our research collaboration with the Cambridge Health Alliance Division on Addiction ("CHADA"). We have already contributed \$4.4m to the programme which shapes our safer gambling activities and contributes to the wider industry's knowledge on gambling-related harm. Since 2019, the research teams have submitted 13 papers with an additional six in active development for submission to peer review. Entain not only provides funding but gives access to anonymised data from player records, ensuring that the research is based on real-life data and behavioural patterns.
<b>Investing in our people and communities</b>		
Invest £100m via the Entain Foundation over the next five years (from 2020) <sup>1</sup>		In 2022, we contributed £21.2M via the Entain Foundation to projects including safer betting and gaming initiatives, our Pitching In grassroots sports investment fund and Entrain, our fund to promote diversity in and through technology.
Implementing the strategic partnership with SportsAid which will support both talented individuals and national sporting excellence programmes in the lead-up to the Paris Olympics		Entain has helped over 200 athletes since the partnership began in 2019 by providing them with a financial award to help with training, equipment, and competition costs, as well as personal development training. We have extended our long-term partnership with SportsAid through to the Paris 2024 Olympic and Paralympic Games, doubling the financial backing made thus far and increasing our total commitment to around £500,000 by 2024.
Embedding and broadening our initiatives to continuously strive to make Entain an inclusive employer of choice where people can succeed and progress in a meritocracy		In 2022, we reshaped 'Everyone's in the Game' – Entain's Diversity, Equity and Inclusion ("DEI") strategy. We launched new initiatives, including our first Global Inclusion Learning Programme, which has already been completed by 97% of retail and 58% of office-based staff. We created two employee networks, Women@Entain and Pride@Entain, to help us better engage and advocate for minority groups. In early 2023, we announced a new partnership with McLaren Racing to support women returning to the tech sector.
Delivery of Well-Me, a targeted three-year plan to enhance the physical and emotional wellbeing of all our colleagues		The delivery of our Well-Me strategy went from strength to strength in 2022, as we further embedded wellbeing in every aspect of the employee lifecycle, from recruitment and onboarding to rewards and development. We launched Entain's first-ever global wellbeing survey in partnership with wellbeing specialists at Robertson Cooper. Our Global Wellbeing Network expanded across our offices to 16 wellbeing leads. We launched The Workplace of Tomorrow, a targeted training for people managers in our retail shops and stadia. Our office in One Stratford Place in London achieved the silver Fitwel certification which recognises buildings optimised to improve health and productivity.
Reducing our scope 1, 2, and 3 emissions by 29.4% by 2027 from a 2020 baseline		We have committed to being net-zero by 2035, with a stage-gate target of 29.4% by 2027 against our 2020 baseline. In 2022, we submitted these targets to the Science-based Targets Initiative, which will be verified in Summer 2023. We also hold a series of workshops with senior leaders across the business to opportunities for Entain to support the transition to a lower-carbon economy. The outcomes have been used to shape our Net Zero action plan.
Further streamlining our approach to supplier management, ensuring our value chain partners share our high social and environmental standards		In 2022, we continue working with Unseen to better understand the ethical risks in our value chain and bolster our due diligence processes. We also started engaging with 19 suppliers that represent 33% of our scope 3 emissions. In early 2023, we partnered with EcoVadis, the world's largest platform for supplier sustainability ratings. Our EcoVadis membership will help us evaluate our key suppliers and their training needs across four topics – environment, labour and human rights, ethics, and sustainable procurement.
<p>1. This commitment included our voluntary contribution to UK Gambling Commission approved Research, Education and Treatment ("RET") providers. With the UK's Gambling Act Review recommending a move to a compulsory levy of 1% of UK Gross Gaming Yield ("GGY") (subject to consultation), we are reviewing the financial commitments of the Group's Foundation going forward.</p>		

# SASB index

Topic	Code	Accounting metric	Data/reference
Environmental Footprint	SV-CA-130a.1 (TC-SI-130a.1)	(1) Total energy consumed (2) Percentage grid electricity (3) Percentage renewable	Refer to page 39
	TC-SI-130a.2	(1) Total water withdrawn (2) Total water consumed	(1) Refer to page 39 (2) Not reported
	TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data centre needs	Refer to page 38
Responsible Gaming	SV-CA-260a.1	Percentage of gaming facilities that implement the Responsible Gambling Index	<p>Not applicable. The Responsible Gambling Index and NCPG Standards mainly focus on US markets, where Entain only operates through our joint venture with BetMGM. Entain is a platinum member of the NCPG. Entain complies with the stringent GC regulations and BGC standards.</p> <p>In early 2022, Entain was awarded the Advance Safer Gambling Standard by GamCare for evidencing the highest standards of player protection in our UK online and land-based activities. The Group is the largest operator to be awarded the highest level of accreditation (Advanced Level 3) for its online activities, and Advanced Level 2 for its land-based activities.</p>
	SV-CA-260a.2	Percentage of online gaming operations that implement the National Council on Problem Gambling (NCPG) Internet Responsible Gambling Standards	
Smoke-free Casinos	SV-CA-320a.1	Percentage of gaming floor where smoking is allowed	<p>Not applicable. Entain does not operate casinos, and smoking is not permitted in our betting and gaming shops in the UK and ROI.</p>
	SV-CA-320a.2	Percentage of gaming staff who work in areas where smoking is allowed	
Internal Controls on Money Laundering	SV-CA-510a.1	Description of anti-money laundering policies and practices	Our Approach to AML and CTF ( <a href="https://entaingroup.com/sustainability/aml-statement/">https://entaingroup.com/sustainability/aml-statement/</a> ).
	SV-CA-510a.2	Total amount of monetary losses as a result of legal proceedings associated with money laundering	Please refer to page 95 of our 2022 annual report ( <a href="https://entaingroup.com/2022annualreport/documents/Entain_Annual-report-2022.pdf">https://entaingroup.com/2022annualreport/documents/Entain_Annual-report-2022.pdf</a> ).

Topic	Code	Accounting metric	Data/reference
Data Privacy & Freedom of Expression	TC-SI-220a.1	Description of policies and practices relating to behavioural advertising and user privacy	Refer to Data Privacy & Cybersecurity on page 32 and Promote responsible attitudes on page 18.
	TC-SI-220a.2	Number of users whose information is used for secondary purposes	We do not collect metrics for secondary purposes. Our position is that we use the data in a transparent way obtaining user consent or applying other lawful processing conditions such as legitimate interest for each collection purpose (including marketing, sharing with third parties, etc).
	TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	To date, Entain had no monetary losses as a result of user privacy legal proceedings.
	TC-SI-220a.4	(1) Number of law enforcement requests for user information	(1) 327 (UK only; 2022)
		(2) Number of users whose information was requested	(2) Not available
		(3) Percentage resulting in disclosure	(3) 81% (2022)
TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Not reported	
Data security	TC-SI-230a.1	(1) Number of data breaches	(1) 40 incidents were investigated as potential breaches of personal data. 3 of those incidents were considered either to meet the reporting threshold or soft notification to a privacy regulator and have subsequently been closed (2022)
		(2) Percentage involving personally identifiable information (PII)	(2) 85% (2022)
		(3) Number of users affected	3) 94 (2022)
TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Refer to Data Privacy & Cybersecurity on page 32	
Recruiting & Managing a Global, Diverse Workforce	TC-SI-330a.1	Percentage of employees that are	Not reported
		(1) Foreign nationals (2) Located offshore	
	TC-SI-330a.2	Employee engagement as a percentage	Refer to page 30
Intellectual Property Protection & Competitive Behaviour	TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for	Refer to page 30
		(1) management	
		(2) technical staff (3) all other employees	
Managing Systemic Risks from Technology Disruptions	TC-SI-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behaviour regulations	Entain had no monetary losses as a result of anti-competitive behaviour proceedings in 2021
		(1) performance issues	(1) Not reported
			(2) service disruptions
TC-SI-550a.1	(3) total customer downtime	(3) 0.07%. Our platform availability was 99.93% in 2020, as reported on our website ( <a href="https://entaingroup.com/about/business-overview/">https://entaingroup.com/about/business-overview/</a> )	
	TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	Read how we mitigate the risk of technological failure in our 2022 Annual Report, page 86 ( <a href="https://entaingroup.com/2022annualreport/documents/Entain_Annual-report-2022.pdf">https://entaingroup.com/2022annualreport/documents/Entain_Annual-report-2022.pdf</a> )

# About this report

- This is the sixth consecutive Environmental Social and Governance (“ESG”) Report for Entain plc, (previously GVC Holdings PLC).
- This report supplements the ESG content in the Entain 2022 Annual Report.
- This report has not been through an external assurance process. However, data is independently validated by sustainability consultancy Carnstone Partners Limited (note that this does not constitute any form of external assurance).
- As in previous years, the Board Sustainability and Compliance (formerly ESG) Committee – the highest ESG body at Entain – has reviewed and approved this Report. As such, Entain believes that this Report fairly reflects our Global ESG Performance and Efforts.
- The data and narrative of this report cover all of the Group’s continuing operations globally unless stated otherwise.
- The reporting period for KPIs in this report aligns with the Entain financial year, which ran from 1st January 2022 to 31st December 2022. Unless stated otherwise, People KPIs refer to a snapshot date of 31st December 2021. Narrative information covers activities that have taken place from the start of 2021 up until May 2022.
- We align to external standards by reporting against the Sustainability Accounting Standards Board (“SASB”) for both the Casinos and Gaming (primary) and the Software & IT Sectors (secondary). We also reported against the Task Force for Climate-related Financial Disclosures (“TCFD”) recommendations in our Annual Report. This is supplemented by reporting other issues and metrics based on our own materiality assessment, as well as legal requirements.
- We welcome feedback and suggestions on the contents of this report or any aspect of our ESG and sustainability programmes. For information on how to get in touch, please visit <https://entaingroup.com/contact-us/>

## Corporate information

### Company name

Entain plc

### Company number

4685V

### Secretary and registered office

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32 Athol Street Douglas  
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IM1 1JB  
Telephone: +350 200 78700  
[www.entaingroup.com](http://www.entaingroup.com)

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### Registrars

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Leeds  
LS1 4DL

[www.linkgroup.eu/get-in-touch/shareholders-in-uk-companies](http://www.linkgroup.eu/get-in-touch/shareholders-in-uk-companies)

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Email: [shareholderenquiries@linkgroup.co.uk](mailto:shareholderenquiries@linkgroup.co.uk)

### Auditors

KPMG LLP  
EastWest  
Tollhouse Hill  
Nottingham  
NG1 5FS

### Legal advisors

Freshfields Bruckhaus Deringer  
DQ Advocates

### Principal UK Bankers

Barclays Bank PLC  
The Royal Bank of Scotland plc

Future trading updates  
and financial calendar

**18 April** Q1 trading update

**10 August** Interim results



**Entain plc**

Incorporated in the  
Isle of Man under  
number 4685V