Anti-Modern Slavery Policy and Statement

APPROVED BY THE EVOKE PLC BOARD OF DIRECTORS 20 MARCH 2025









Anti-Modern Slavery Policy

1. Summary and Policy Objectives

Modern slavery is a crime and a fundamental violation of human rights. evoke plc and its subsidiaries (the "Group" or "we") are committed to eradicating all forms of modern slavery from our operations and supply chain.

We expect the same high standards from all our contractors, suppliers, and business partners, irrespective of location. We will not knowingly engage with any individual or organisation involved in slavery, servitude, forced labour, human trafficking, or child labour, as defined by the UK Modern Slavery Act 2015 (collectively referred to as "Modern Slavery").

This policy is designed to identify vulnerabilities in the Group's supply chain and implement procedures to prevent engagement with entities involved in Modern Slavery. It seeks to balance: (i) our core values of ethical and legal conduct; (ii) compliance with relevant laws; (iii) operational focus on core business activities; and (iv) respect for supplier independence.

2. Application

This policy applies to all Group companies and relevant suppliers.

3. Group Structure, Business, and Supply Chains

Industries at higher risk of Modern Slavery typically involve labour-intensive work with a high proportion of migrant workers. As an entertainment business with a skilled workforce and an online-focused operation, the Group has a relatively small and lower-risk supply chain. Our primary suppliers provide marketing, advertisina, professional services, software, payment services, IT, telecommunications, hospitality, and insurance.

While our business model presents a low risk of Modern Slavery, we actively monitor and mitigate any potential risks, particularly among suppliers providing services such as cleaning, catering, and security. We continuously assess and conduct due diligence on such suppliers to ensure compliance.

4. Responsibility

The Board of Directors has overall responsibility for this policy. The Group's Company Secretary oversees its implementation, while the Chief Procurement Officer ensures risk mitigation in the supply chain.

5. Related Policies and Procedures

To support this policy, the Group implements:

 Compliance with local employment and supply chain laws, with legal counsel review where necessary.







- Identity and right-to-work checks for employees and contractors.
- Anti-Bribery and Corruption policies to uphold ethical standards.
- A Whistleblowing policy, enabling employees and contractors to report concerns without fear of retaliation.

6. Supplier Risk Assessment and Due Diligence

We take supply chain management seriously and ensure supplier contracts mandate compliance with applicable laws. Enhanced due diligence measures include:

- Incorporating robust Modern Slavery clauses in supplier contracts.
- Conducting risk-based supplier audits and assessments.
- Embedding Modern Slavery checks in all formal tendering processes.
- Implementing continuous supplier monitoring using third-party risk assessment tools.
- Taking corrective action against any supplier that fails to meet our standards.

7. Communication and Awareness

This policy is communicated across the Group and made available on the corporate website and intranet.

8. Annex

Annex 1: Slavery and Human Trafficking Statement







Modern Slavery Statement

1. Introduction

Under the UK Modern Slavery Act 2015, UK businesses must promote ethical practices that protect workers from exploitation. This statement outlines the steps evoke plc has taken to prevent Modern Slavery within its operations and supply chain.

evoke plc first published a transparency statement in 2017. This document serves as our seventh statement under the Act.

2. About evoke plc

evoke plc is a leading global betting and gaming company. Following the 2022 acquisition of William Hill's international business, the Group operates from 11 offices worldwide and employs approximately 9,000 people. Listed on the London Stock Exchange, evoke plc is a member of the FTSE4Good Index, demonstrating our commitment to responsible business practices.

3. Policies and Commitment

The Group operates with integrity and respects human rights across its operations and supply chain. Our Anti-Modern Slavery Policy, approved by the Board, aligns with international standards and best practices.

4. Risk Assessment

The Board of evoke plc remains vigilant regarding Modern Slavery risks. We uphold a zero-tolerance approach, aligning with the UN Guiding Principles on Business and Human Rights and International Labour Organisation standards.

The Board's ESG Committee oversees our Modern Slavery risk strategy. Our Procurement function regularly assesses supply chain risks and confirms that the Group remains a low-risk business. This assessment considers:

- The nature of our operations, focused on online gaming and betting.
- The absence of significant changes to our business model.
- The predominance of operations in low-risk jurisdictions, per the Global Slavery Index.

Some parts of our supply chain operate in moderate-risk regions, such as the Philippines and Romania. We continue to monitor and assess risks in these areas, with no concerns identified to date.

5. Due Diligence and Risk Management

The Group has strengthened its supply chain due diligence by:

• Embedding Modern Slavery clauses in supplier agreements.







- Conducting reputational checks for all new suppliers, specifically assessing Modern Slavery risks.
- Requiring suppliers responding to tenders to confirm compliance with antislavery laws.

6. Training and Awareness

Our e-learning platform provides Modern Slavery training, featuring case studies and reporting procedures. Employees are encouraged to report concerns via line managers or the independent Whistleblowing hotline.

7. 2024 Actions

In 2024, we further strengthened our Modern Slavery risk management by:

- Reviewing and enhancing the Group's Anti-Modern Slavery Policy.
- Continuing alert-driven monitoring of the Groups supply base.

Setting strong foundations to establishing a robust risk framework for the Group's supplier base.

8. 2025 Commitments

We will:

- Maintain our zero-tolerance stance on Modern Slavery.
- Enhance third-party software for continuous supply chain monitoring.
- Continue to take decisive action against any non-compliant suppliers.
- Review Modern Slavery obligations as a qualification criterion in all formal tendering, with a view to enhance the existing controls.
- Publish a Supplier Code of Conduct outlining human rights expectations.

9. Transparency Statement

This statement is made by evoke plc in accordance with Section 54(6) of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2024. It was approved and signed on behalf of the Board of Directors of evoke plc on 20 March 2025.

Per Widerstrom Chief Executive Officer 20 March 2025