

POLICY

Whistleblowing



Who is this Policy for?

This policy applies to all individuals working for the Group at all levels and includes directors, senior managers, employees, and contractors (together, Employees).

Purpose of this policy

The Board of Directors of 888 Holdings PLC (the Board) has adopted this policy to ensure that employees may, in confidence, raise genuine concerns if they have reasonable grounds for believing that possible or actual wrongdoings or omissions have or will occur by, or in relation to, the Group where the Employees work or has worked.

Wrongdoing involves any unlawful or otherwise improper behaviour and can include (a non-exhaustive list):

- the commission of an unlawful act, whether criminal or civil;
- failure to comply with legal obligations;
- the occurrence of a miscarriage of justice;
- breach of or failure to implement or comply with any approved policy of the Group, including but not limited to, the Group's Anti-Bribery and Corruption Compliance Program, AML/KYC policy, Anti-Tax Evasion Facilitation Policy, internal financial controls approved by the Group, privacy policy, Anti Modern Slavery Policy, anti-sexual harassment policy, Environmental Policy, and the Group's Employee Handbook;
- unprofessional conduct or conduct not consistent with established standards of practice;
- engaging in questionable accounting or auditing practices;
- engaging in dangerous activity likely to cause physical harm/damage to any person/property;
- failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to the Group;
- abuse of power or authority for any unauthorized or ulterior purpose; and
- unfair discrimination in the course of employment or provision of services; or
- the deliberate concealment of any of the above.

The Board aims to ensure that Employees are confident that they can report and disclose such activity (Disclosures) without fear of reprisals or victimisation, in the knowledge that they will be taken seriously, and that the Disclosures will be investigated appropriately and regarded as confidential.

Persons responsible for implementation of this policy

The Board has overall responsibility for this policy but has delegated day-to-day responsibility for overseeing and implementing it to Group Internal Audit with additional oversight from Group Legal and Compliance functions.

Reporting Disclosures

If you have a reasonable belief that misconduct or malpractice has occurred or may occur, then it is your responsibility to come forward and explain these. You do not have to be absolutely sure. It may simply be a mistake in the system or process, rather than a deliberate wrongdoing, and therefore you must exercise your judgment and common sense.

In any event, do not leave matters until it is too late. If you fail to report, unreasonably in the Group's view given all the related circumstances, any wrongdoing or serious suspicion of wrongdoing that you believe has happened, we will regard such a failure as a serious disciplinary matter.

If you can, you should speak to your manager in the first instance. If you do not feel comfortable discussing this with your manager, you may consider contacting your local human resources team.

We accept that there will be certain circumstances when you will feel uncomfortable doing this. In these circumstances, we have an arrangement with an independent third party, Navex Global, to provide every employee in the Group with access to a confidential "free to call" or "online reporting" service to enable you to report concerns with confidence.

A list of their country specific telephone numbers and URL to the online reporting form can be found at Appendix 1 of this policy document.

Confidentiality

Navex Global is an independent organisation. You can make a disclosure with total confidence that your call will not be traced or recorded. Information given to Navex Global will be made available to dedicated senior representatives in Group Legal and Group Internal Audit who will act on it without compromising you in any way. Full details of how your personal information is used when you use our independent whistleblowing service are detailed in Appendix 2 at the end of this policy.

Investigation

The Head of Internal Audit will make a preliminary assessment of the information disclosed and to determine whether that information establishes that:

- A formal investigation is required;
- Reference to one of the Group's established disciplinary procedures is justified as a proper alternative to a full investigation;
- An immediate reference to an outside body (for example, the Police) is justified, taking into account the seriousness of any evidence disclosed; or
- No investigation is necessary.

The Head of Internal Audit will be entitled to discuss the matter with senior employees where appropriate and/or obtain independent external legal, accountancy, forensic or other professional advice to assist in the preliminary assessment and the investigation of the information disclosed.

If the Head of Internal Audit determines that further investigation is warranted, it will be performed by an Investigation Team. They will be selected by the Head of Internal Audit and will consist of employees with sufficient skills and experience to deal with the information disclosed.

If the Investigation Team finds that the information disclosed does not establish a case against the person or persons concerned, no further action will be taken. If the Investigation Team finds that the disclosure was motivated by malice or was made recklessly without proper regard for the truth, it may recommend formal disciplinary action against you as the disclosing employee. If the Investigation Team finds that the case is established, it will make a recommendation for action, which will include, but not necessarily be limited to:

- Bringing action against the person or persons concerned under the Group's disciplinary procedures; or
- Contacting, on a confidential basis, an appropriate external body for further investigation or decision. The external body may be the Police, the Health & Safety Executive, the Inland Revenue, Customs & Excise, or another appropriate body.

In very serious cases, following the Audit Committee's recommendation to the Board (either during or following relevant internal company investigations), and generally following consultation with external legal counsel, the Board may decide that the specific matter cannot be dealt with internally and notification must be made to external authorities. Subject to the requirements of applicable Law, relevant Employees will be informed if a referral to an external authority is about to take place. Only in very specific instances will such a referral be made without the knowledge of the Employee who has made the original Disclosure (or other relevant Employees if relevant), if such disclosure (a) could potentially disrupt or compromise the external investigation; or (b) is prohibited pursuant to applicable law and regulations.

Internal Reporting of Disclosures

The Chief Risk Officer, Chief People Officer, Chief Legal Officer and Head of Internal Audit will meet once a month, or ad hoc as required, to discuss all disclosures to determine that appropriate steps have been taken relating to each case.

Whistleblowing will have a standing agenda point at each Group Audit Committee and the Head of Internal Audit will report to the Audit Committee in this regard.

Commitments to Reporters

When making a report, you will be provided with acknowledgement of receipt and an update to the case will be provided every 14 days. You will be informed when the case has been concluded, although specific details of outcomes may be limited due to confidentiality requirements.

Protection and support for Employees

No employee who raises genuinely held concerns in good faith under this procedure will be dismissed or otherwise face reprisals, discrimination, or victimisation as a result of his/her Disclosure. If an Employee believes that he/she is being subjected to this behaviour within the workplace as a result of making a Disclosure (including by one's direct line manager or other manager), he/she should inform the Head of Internal Audit or otherwise the local Human Resources Department.

It is expressly noted that Employees who victimise or retaliate against others who have raised a concern or made a Disclosure in good faith, will be subject to disciplinary action – and such circumstances could be grounds for immediate termination.

Disclosing information to an External Authority

We recognise, that you may consider that disclosure to an external authority may be justified even if an Investigation Team decides there is no case to answer or if the information to be disclosed is of such importance that immediate reference to an external authority would be appropriate in any event. In either of these cases (but particularly if immediate disclosure is thought to be justified), you must be satisfied that:

- You are making the disclosure in good faith and not for any personal gain;
- You reasonably believe the information to be substantially true;
- It is reasonable to disclose the information to an external source; and
- You reasonably believe that no alternative is available because of a general fear of personal detriment, concealment or destruction of evidence by your employer or because previous disclosure to your employer of the same information has been made without result.

Where the normal reporting procedure is not followed because the information is considered exceptionally serious, you must be satisfied that is indeed the case.

You must understand that avoidance of the normal reporting procedure when these conditions cannot be satisfied may leave you open to legal action by the person or persons wrongly and unjustifiably implicated, and/or leave you subject to the Group's disciplinary procedures.

Appendix 1 – Whistleblowing – Reporting Options

Online reporting

888williamhill.ethicspoint.com

Free phone numbers

Country	Free phone number
Antigua	1 833 416 7070
Bulgaria	0800 46 226
Columbia	01 800 519 0378
Ceuta	900 999 313
Denmark	80 83 02 32
Gibraltar	+44 808 1965 756
Ireland	1 800 887 766
Israel	1 809 455 308
Italy	800 729 261
Latvia	80 005 735
Malta	80 06 2784
Philippines	1800 1322 0315
Poland	800 005 056
Romania	0800 890 546
Spain	900 999 313
Sweden	020 10 93 95
United Kingdom	0808 196 5756
United States	844 913 0979

Appendix 2

This notice describes how your personal information is used when you use our independent whistleblowing service.

The data controller for the whistleblowing information is NAVEX Global, Inc. ("NAVEX") contact details of their Data Protection Officer (DPO):

Attention: Data Protection Officer

5500 Meadows Road, Suite 500

Lake Oswego, OR 97035 USA

privacy@navexglobal.com

The categories of personal data we collect are:

- Information about the whistleblowing activity
- Names

You do not have to provide your name when using the service, you can report anonymously.

NAVEX will process your personal data for the below purposes:

- Collecting information relating to a whistleblowing incident
- Investigating a whistleblowing claim
- Providing anonymous information to the Group to complete whistleblowing investigations

NAVEX perform these services under contract with the Group. The legal basis to process this information is: Public Interest – preventing and detecting unlawful acts or where you have consented for your information to be processed. If you have consented to your data being processed.

The Group is also a data controller of the information that is provided by NAVEX you can contact the DPO on: dataprotection@williamhill.com

The Group will use the information provided to investigate whistleblowing activities brought to the attention of the company.

Data Sharing

NAVEX will share the whistleblowing information with the Group. Depending on the nature of the whistleblowing incident, the Group could share the information with law enforcement or regulatory agencies.

Retention

We will retain your information for the necessary period of time that it serves the purpose for which it was originally collected or subsequently authorized and in accordance with applicable law. For example, we will retain your information for as long as your account is active, as necessary to comply with our legal obligations and rights, to resolve disputes, and to enforce our agreements."

Your rights

You have the rights to:

- Information about how your data is being used
- Access the information we process about you
- Erasure of the information we process about you
- Rectification of the information we process about you
- Restrict the processing of your data
- Object to our use of your data
- Data portability
- Lodge a complaint with a data protection regulator / "supervisory authority"

We do not conduct any automated decision making or profiling on your personal data.

You do not have to provide us with personal data but it may impact the quality of the whistleblowing if you do not provide information that is needed to complete a full investigation.