

GROUP POLICY

Supplier Code of Conduct

evoke

1. Introduction

Welcome to evoke plc ('evoke'), one of the world's leading betting and gaming companies. As we continue to grow and innovate, I am proud to lead a team dedicated to excellence, integrity, and sustainability.

Our brands, including 888, William Hill and Mr Green, are recognised globally for their quality and customer focus. Operating in over 100 countries, we serve more than 5 million players annually, supported by our 11,000 employees across 14 countries, including those within our 1,300 UK licensed betting shops.

At evoke, we are committed to offering products that are socially, economically, and environmentally sustainable. Our sustainability efforts encompass community engagement, responsible gambling, business responsibility, employee well-being, and environmental stewardship.

Our Supplier Code of Conduct ensures that all goods, services, and contracts delivered to evoke meet the highest standards of ethical and sustainable practices. We prioritise partnerships with suppliers who share our values and commitment to environmental stewardship, resource efficiency, and sustainable production. It is crucial to our business to work with suppliers who meet these standards.

We are particularly proud of the progress we have made in our ESG strategy in recent years, reflecting our dedication to a sustainable future. Our dedication to positive change is exemplified in our own ESG strategic pillars which surround 'Players, People, and Planet'. Reflective of this, we prioritise partnerships with suppliers who share our values and hold commitment to a responsible supply chain.

Looking ahead, evoke remains focused on delivering exceptional player experiences and driving innovation as one of the leaders in the global betting and gaming industry. We can achieve great things and create a positive impact on the world by working together.

Thank you for being part of our journey.

Best Regards,

Per Widerström

Chief Executive Officer

evoke plc



1.1 Supplier Code of Conduct

evoke have many supplier partners who work with us in the course of our business – This Supplier Code of Conduct ('Supplier Code', 'the Code') sets out the principles, behaviors and standards that we expect from those suppliers and anyone who does business with us.

If you are new to working with evoke, it is essential that you read and agree to this Supplier Code of Conduct during your onboarding process. This Code is subject to regular review and may be updated periodically, with any material changes communicated to our business partners via email. The Code is also accessible on our corporate website for your reference at any time. We encourage you to thoroughly read the Code and understand our expectations.

In this Code, the term "Supplier" encompasses third parties, business partners, suppliers, and their officers, subsidiaries, affiliates, employees, subcontractors, agents, consultants, and/or recruitment agencies, as applicable. "evoke" refers to all brands, subsidiaries, and affiliated entities of evoke plc globally.

By entering into a business relationship with evoke, you acknowledge and accept the obligations outlined in this Code and agree to adhere to them, in addition to your contractual and other obligations. We expect you to maintain records demonstrating your compliance with this Code, as any breach of these obligations may be considered a material breach of contract.

This Supplier Code aims to ensure that all goods, services, and contracts delivered to evoke are produced under conditions compatible with the standards set out herein:

Standards and Conventions

- UN Declaration of Human Rights (1948) (www.un.org)
- UN Convention on the Rights of the Child, Article 32 (www.un.org)
- UN Global Compact Ten Principles (www.unglobalcompact.org)
- UN Guiding Principles on Business and Human Rights (<https://www.ohchr.org/en/business/un-guiding-principles-business-and-human-rights>)
- ILO Core Conventions: Nos. 29, 87, 98, 100, 105, 111, 138, and 182 (www.ilo.org)
- OECD Guidelines for Multinational Enterprises (<https://mneguidelines.oecd.org/mneguidelines/>)

Additional Standards

- Worker protection, work environment, and environmental protection legislation and directives in the country of manufacture.
- Labour law and modern slavery acts, including minimum wage and social security protection in the country of manufacture.
- Freedom of association and human rights acts in the country of manufacture.
- Data protection law in the country of manufacture, such as UK and EU GDPR.
- Anti-bribery and corruption laws and acts in the country of manufacture.

This Code obliges suppliers, service providers, agents, and subcontractors to adopt the same standards of business conduct.

2. Compliance with Laws and Regulations

As sustainability regulations and expectations continue to evolve, evoke plc remain dedicated to collaborating with suppliers to ensure the Group also meets its strategic obligations and upholds its commitment to responsible business practices. We expect suppliers to stay informed with mandatory regulations changes and comply with relevant legal standards.

3. Human Rights

Suppliers are required to uphold all internationally recognised human rights, at a minimum including those outlined in the International Bill of Human Rights and the core labour rights defined in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, throughout its entire supply chain.

Suppliers shall maintain a work environment that is free from all forms of harassment, discrimination, intimidation, and abuse, whether physical, verbal, psychological, or otherwise.

4. Employee Rights

The Supplier must comply with national legislation if it imposes stricter requirements than the ILO core conventions, the UN Convention on the Rights of the Child, or the UN Declaration of Human Rights from 1948. For example, prohibiting child labour or forced labour within operations and subsequent supply chain.

Suppliers must comply with all applicable laws on working hours in which they operate, including those related to overtime.

4.1 Wages and Working Hours

At evoke, we are committed to ensuring that all employees are treated fairly and with respect. This includes providing fair wages and regulating working hours to ensure a balanced and healthy work-life environment. Suppliers must adhere to the following standards to uphold these principles:

- Salary must be paid directly to the employee, on time, and in full. Working hours must be regulated and reasonable. Salary deductions as disciplinary measures are not permitted.
- The provision of fair wages and benefits which must be in line with local minimum wage standards.

- No forced or penal labour. Employees must not be forced to deposit valuables or identity papers.
- If the right of association is limited, the Supplier must facilitate regular meetings between employees and management to discuss wages and working conditions without repercussions.

4.2 Work Environment

- The Supplier must ensure a safe and secure working environment. Employees must be informed about risks and provided with relevant protective equipment.
- Ensure adequate HR Policies are in place, including the protection of employee data, in line with applicable regulatory obligations
- Systems and processes should be in place to help prevent accidental injuries in the workplace and illnesses. Any accidents which do occur must be documented and reported where appropriate.

4.3 Occupational Health and Safety

Suppliers shall provide a healthy working environment for all employees, in compliance with applicable laws and internationally recognised standards. This includes:

- Identify, assess, and mitigate workplace hazards such as through risk assessments
- Maintain appropriate health and safety policies and procedures
- Ensure access to clean sanitation facilities and potable water
- Implement effective occupational health and safety management systems
- Provide regular health and safety training to workers and establish clear procedures for emergency preparedness, response, and evacuation

5. Environment and Sustainability

evoke expects suppliers to pursue continuous improvements that reduce environmental impact at every stage of the product or service life cycle, from design and sourcing through to production, distribution, use, and end-of-life. We expect the supplier to conduct systematic reviews and have systems in place that support this.

We expect our suppliers to actively minimise their environmental impact and operate in a manner that supports commitment to sustainability. This includes responsible management of waste, energy, and water use, and taking measurable steps to reduce greenhouse gas emissions and conserve natural resources.

Suppliers must comply with all applicable environmental laws and regulations in the country of which they operate and are encouraged to establish appropriate policies, systems, and continuous improvement programs that drive positive environmental outcomes.

Suppliers must be committed to align with global climate objectives and demonstrate a clear commitment to achieving **net zero greenhouse gas emissions by a minimum of 2050**. This includes developing transition plans, policy statements, tracking emissions, and implementing reduction strategies over time.

As part of our future sustainability reporting obligations, including Scope 3 emissions, we will require suppliers to share relevant environmental performance data with evoke plc. This will be a requirement for global sustainability directives for which evoke plc will need to report, such as that of CSRD and CSDDD where relevant. Where appropriate, evoke may seek to jointly agree on environmental targets to support progress toward our collective sustainability goals.

6. Social Responsibility

Suppliers must uphold high standards of social responsibility in their operations and across their supply chains. This includes respecting human rights, ensuring fair and safe working conditions, supporting diversity and inclusion, and adhering to all applicable labour and anti-slavery laws as separately outlined.

We expect suppliers to treat all individuals with dignity and respect, maintain policies that prevent discrimination and harassment, and prohibit any form of forced or child labour. Suppliers should foster a workplace culture that promotes ethical conduct and social equity.

We also encourage suppliers where possible to:

- Support and invest in the well-being of their workforce, promoting a healthy, safe, and inclusive working environment.
- Engage positively with their local communities, contributing to social development and local economic resilience.

7. Business Ethics and Anti-Corruption

7.1 Anti-Corruption and Compliance

evoke maintains a zero-tolerance policy towards all forms of corruption. Suppliers must be completely free from any involvement in corrupt practices, including but not limited to bribery, extortion, and facilitation payments. Suppliers are expected to proactively implement measures to detect, prevent, and address all forms of corruption throughout their operations and supply chains.

Suppliers must comply with all applicable anti-corruption and anti-bribery laws, including the UK Bribery Act 2010, the U.S. Foreign Corrupt Practices Act (FCPA), and any relevant local laws and regulations in the jurisdictions where they operate or provide services. This includes strict adherence to national legislation in the country of manufacture and/or service provision.

7.2 Money Laundering and Terrorist Financing

The Supplier must prevent its operations from being used for Money Laundering or Terrorist Financing. This includes establishing routines to understand its partners and suppliers, and the purpose of the business relationship. National legislation must always be followed.

7.3 Gifts and Hospitality

The Supplier must ensure that any gifts or hospitality offered or received are appropriate, reasonable, and not intended to improperly influence business decisions or create a conflict of interest. All such activities must meet the following criteria:

- Modest in value: Gifts and hospitality must not be extravagant, excessive or lavish.
- Transparent: all gifts and hospitality must be properly documented and reported in accordance with the Supplier's internal policies and procedures.
- Occasional: they must be infrequent and not offered or accepted on a regular basis to avoid any perception of impropriety.
- Culturally appropriate: consideration must be given to cultural norms and practices in the country where the business is conducted.
- Legally Compliant: All gifts and hospitalities must comply with all applicable local and international laws, including anti-bribery and corruption regulations.

7.4 Competition

The Supplier must comply with all applicable competition laws to ensure fair business practices. This includes:

- Avoiding anti-competitive agreements: must not engage in agreements that restrict competition, such as price-fixing or market-sharing.
- Preventing abuse of market power: must not exploit a dominant market position to the detriment of fair competition.
- Ensuring transparency: conduct business in a transparent manner, avoiding deceptive or unfair practices.

8. Safer Gambling

Suppliers involved in gambling-related product development, marketing, sales, or monitoring must ensure their staff (including subcontractors) comply with evoke's requirements for compliance, licensing, and special training on safer gambling. The training aims to create awareness and understanding of the negative consequences and risks of gambling.

Suppliers whose staff (and subcontractors) work directly with evoke's customers, such as live casino staff or bookmakers, must ensure these employees familiarise themselves with, and stay updated on, standards, training, and licensing to fully provide a safer gambling experience. Additionally, these staff members must

actively participate in meetings and in-depth training regarding duty of care and safer gambling tailored to their specific assignments for evoke.

9. Compliance

The Supplier must comply with the Supplier Code and have control systems to ensure these requirements are met. The Supplier must also ensure that subcontractors down the supply chain comply with these requirements:

9.1 Regulatory Compliance

The Supplier must report any regulatory or licensing breaches within 48 hours to enable evoke to meet its regulatory obligations. Post-remediation of such breaches is not acceptable. Additionally, the Supplier must inform evoke in writing of any legally binding judgments for violations of the legislation specified in the Supplier Code as soon as possible.

9.2 Tax Responsibility

The Supplier must publish tax responsibility statements and policies on their websites where applicable. The Supplier must declare any major tax authority investigations or material disclosures as they occur. Additionally, the Supplier must declare any activities in jurisdictions listed on the OECD or EU black or grey lists.

10. General Aspects

10.1 Media and Publicity

Suppliers must not make statements to the media, issue press releases, or use evoke's brand, logo, or trademark materials without the prior written consent of evoke which can be withdrawn at any time.

10.2 Business Continuity

Suppliers must have effective business continuity management plans to provide robust frameworks to mitigate against major business disruption. Personnel must be trained regularly with frequent testing of business continuity plans including threat simulations. Results must be shared with evoke upon request.

If a business continuity response is invoked, or significant risks to a supplier's business continuity framework are identified, which may impact minimum contractual service delivery then evoke should be informed in a timely manner in order to escalate this as per evoke's business continuity framework.

10.3 Data Protection and Confidentiality

Suppliers must comply with local laws and regulations governing data protection and confidentiality when processing personal information. Suppliers must:

- Implement robust data protection measures to safeguard personal data.
- Ensure compliance with GDPR, CCPA, and other relevant data protection regulations.
- Regularly review and update data protection policies and practices.

10.4 US Licensing Requirements

Suppliers must ensure they hold all relevant licenses required by U.S. gambling regulations for their operations. This includes understanding and complying with state-specific gaming laws and obtaining necessary gambling licenses.

10.5 Risk Management

evoke has a low risk appetite for third party failure and expects suppliers to have a suitable risk management framework which identifies risks to their business and the associated controls to mitigate them. This must be shared with evoke upon request. If a supplier identifies a significant risk which threatens their ability to delivery minimum contract service levels then this should be informed to evoke in a timely manner.

11. Animal Welfare

Where applicable, suppliers and service providers must use humane procedures and sound practices designed to prevent the mistreatment of animals and ensure the proper handling and humane shelter, pasture and transport of animals within their entire supply chain.

12. Reporting Concerns/Whistleblowing

You should report to evoke any conduct, including conduct of any evoke employee or representative, that you believe in good faith to be a possible violation of this Supplier Code of Conduct, regulation or law. In all instances please contact:

- evoke plc, Suite 601/701 Europort, Gibraltar, GX11 1AA

evoke values confidentiality and will take reasonable measures to preserve confidentiality in light of the circumstances of any particular report. evoke will then review and respond as appropriate to reports regarding Supplier concerns.

evoke expects that its Suppliers will not retaliate against anyone who makes a good faith report of a Supplier concern, whether that report is made internally at the Supplier or to evoke.