

NAME OF PROCEDURE	Whistle-blowing Policy
LINKS TO	Disciplinary Policy and Procedure, Grievance Policy
OWNER	Simona Camilleri, General Counsel
RESPONSIBLE	Simona Camilleri, General Counsel
INFORMED	All employees

1. REVISION HISTORY

1.1 All copies of this procedure must be kept under strict control; all changes must be recorded on the Table of Revision.

1.2 This procedure will be reviewed as per the policy review calendar.

1.3 Table of Revision

VERSION	DATE OF REVIEW	DATE PUBLISHED	DESCRIPTION OF CHANGE	ADMINISTRATED BY	REVIEWED BY	AUTHORISED BY
1.0			Version 1			L Evans
1.1	May 2020	June 2020	Document formatted to align with other policies; List of authorities updated. Data Protection paragraph and paragraph relating to non-contractual policy reference added.	B Wangrat-Tomko (People Partner)	H Cooke (Senior People Partner), C Budge (Head of People Operations, L Evans (VP of People and Organisational Development, Carys Damon, General Counsel)	Carys Damon, General Counsel
1.2	February 2025		Updated General Counsel details and legislation	Sheena Patel (Head of Legal)	Simona Camilleri, General Counsel	Simona Camilleri, General Counsel

1. Introduction

This policy applies to all employees and workers of Inspired Entertainment, Inc, and each of its subsidiaries (the "Company"). Other individuals performing functions in relation to the Company, such as agency workers and contractors are encouraged to use it.

It is important to the business that any fraud, misconduct or wrongdoing by employees of the Company is reported and properly dealt with. The Company therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the management from time to time.

1.1 Data protection and confidentiality

Where a whistleblowing concern is raised openly, we will maintain confidentiality as far as possible. If we need to reveal an employee's identity to anyone, we will notify that individual beforehand. In the alternative, whistleblowing concerns may be raised anonymously. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide any feedback.

Any records must be kept in accordance with the relevant provisions of data protection laws. The Data Protection policy can be found [here](#).

2. Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

The Company may not dismiss, victimise or subject an employee to any other detriment for making a "protected disclosure", simply because they have made a disclosure.

The Company encourages employees to raise their concerns under this procedure in the first instance. If an employee is not sure whether or not to raise a concern, they should discuss the issue with their line manager or the People Team.

3. Principles

The following general principles apply to this policy:

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of;
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue;
- No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern;
- Victimisation of an employee for raising a protected disclosure will be a disciplinary offence;
- If misconduct is discovered as a result of any investigation under this procedure the Company's disciplinary procedure will be used, in addition to any appropriate external measures;
- Maliciously making a false allegation is a disciplinary offence;
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. Employees should report such matters to their line manager or the People Team.

4. Procedure

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the Company's grievance procedure.

(1) Step One:

In the first instance, and unless the employee reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason the employee does not wish to approach their line manager, any concerns should be raised with the employee's line manager. If an employee believes the line manager to be involved, or for any reason does not wish to approach the line manager, then the employee should proceed straight to step 3. Employees are encouraged to set out their concerns in writing, clearly outlining:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and any other relevant information.

(2) Step Two:

The line manager will arrange an investigation of the matter (either by investigating the matter themselves or immediately passing the issue to someone in a more senior position). The investigation may involve the employee and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above and the level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing. The employee's statement will be taken into account, and they may be asked to comment on any additional evidence obtained. The line manager (or the

person who carried out the investigation) will then report to the Executive Management Team, which will take any necessary action, including reporting the matter to the Board of Directors or any appropriate government department or regulatory agency. If disciplinary action is required, the line manager (or the person who carried out the investigation) will report the matter to the People Team who will where necessary start the disciplinary procedure. On conclusion of any investigation, unless the concern has been raised anonymously, the employee will normally be told the outcome of the investigation and what the Executive Management Team has done, or proposes to do, about it. If no action is to be taken or if the outcome cannot be explained to the employee for some other reason, the reason for this will be explained.

(3) Step Three:

If the employee wishes to appeal the outcome of the initial investigation or is concerned that their line manager is involved in the wrongdoing, has failed to make a proper investigation, or has failed to report the outcome of the investigations to the Executive Management Team, they should inform either the People Team or the Company's General Counsel, who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report to the board as in step 2 above. If for any other reason the employee does not wish to approach their line manager, they should also in the first instance contact the People Team. Any approach to the People Team will be treated with the strictest confidence and the employee's identity will not be disclosed without their prior consent.

In some cases, it may be necessary to ask the employee to attend a meeting to clarify the nature of their concern and/or appeal. Employees may bring a colleague or a trade union representative with them to the meeting. On conclusion of any appeal and/or investigation process under step 3, unless the concern has been raised anonymously, the employee will normally be told the outcome of their appeal and what the Executive Management Team has done, or proposes to do, about it. If no action is to be taken or if the outcome cannot be explained to the employee for some other reason, the reason for this will be explained.

5. External reporting

We encourage employees to raise whistleblowing concerns internally in the first instance. In most cases, employees should not find it necessary to alert anyone externally. However, if on conclusion of steps 1, 2 and 3 above the employee reasonably believes that the appropriate action has not been taken, they should report the matter externally to the proper authority.

1.

End of document.