



Supplier Code of conduct

RANK GROUP PLC

SUPPLIER CODE OF CONDUCT

MAY 2026

VERSION PUBLISHED DATE: 10/05/2026

DOCUMENT CONTROL

APPROVAL HISTORY

| Version | Date | Approved | Role | Action |
|---------|------------|----------------|-------------------------|-------------------|
| 1.0 | 27.07.2024 | Richard Harris | Chief Financial Officer | Document Approval |
| 1.1 | 09.05.2026 | Cliff Baty | Chief Financial Officer | Document Approval |

REVIEW HISTORY

| Version | Date | Reviewer | Role | Action |
|---------|------------|---------------|-------------------------|---|
| 1.0 | 19.06.2024 | Paul Swendell | Director of Procurement | Document Creation |
| 1.1 | 05.03.2026 | Paul Swendell | Director of Procurement | Labour and Human Rights and Cyber Updates |

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Supplier Code of Conduct

A message from Paul Swendell, Director of Procurement

Rank is a UK FTSE listed company that offers gaming-based entertainment in venues and online through multiple brands, including Mecca Bingo, Grosvenor Casinos, Enracha, YoBingo, YoCasino, Yo Sports, Regal Wins, Magical Vegas, Kitty Bingo, Spin and Win, Lucky Pants Bingo and Lucky VIP, Bella Casino.

This document underpins Rank's Supplier Code of Conduct and outlines the minimum standards and expectations we have for our suppliers across key areas including ethics, labour practices, environmental responsibility, human rights, and compliance with applicable laws and regulations. These expectations apply to suppliers working with any of Rank's brands globally.

By adhering to this Code, suppliers contribute to the development of a responsible and sustainable supply chain. Rank also encourages collaboration and engagement with suppliers to support these objectives, including the sharing of best practices, training and guidance where appropriate, and maintaining open and constructive dialogue.

Compliance with this Code of Conduct is an ongoing condition of doing business with Rank. Suppliers must ensure they maintain appropriate documentation to evidence their compliance at all times. Any breach of this Code may ultimately affect the supplier's business relationship with Rank.

Laws, regulations, and expectations relating to sustainability are evolving rapidly. Rank is committed to working with its suppliers to ensure the Group continues to meet its obligations. As a listed company, we are required to report on the actions we are taking to operate responsibly and progress towards our sustainability targets. As part of this, we may from time to time request data or information from suppliers that may not appear immediately relevant, and we appreciate your cooperation and support in responding to such requests.

Suppliers are encouraged to read and understand this Code to ensure that the standards and principles it sets out are always upheld when working with Rank.

Paul Swendell
Director of Procurement

Guiding Principles

Introduction:

This Supplier Code of Conduct outlines the principles and expectations for all suppliers conducting business with Rank. We are committed to maintaining the highest standards of ethical conduct and expect the same from our suppliers. We require that all our suppliers adhere to this Code of Conduct and encourage them to exceed these standards whenever possible.

Legal Compliance

Suppliers must comply with all applicable laws, regulations, and standards in the countries where they operate.

Ethical Business Practices

Suppliers must conduct all business activities with integrity and avoid any form of corruption, bribery, or fraudulent practices.

Labour and Human Rights and Rights to Work

Suppliers must respect and uphold the legal rights of their workers, including:

- Prohibition of child labour and forced labour
- Providing fair wages and benefits in line with local minimum and living wage standards.
- Respecting workers' rights to freedom of association and collective bargaining.

- Ensuring a workplace free of harassment, discrimination, and abuse
- Right to collective bargaining
- Complying with all applicable laws on working hours and overtime
- Health and Safety: Suppliers must provide a safe and healthy working environment for all their workers. They should implement systems and procedures to prevent accidents, injuries, and occupational illnesses.
- The Supplier shall comply with all internationally recognised human rights, as a minimum, those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work in any part of its supply chain.

Environmental Sustainability

Suppliers should commit to reducing the environmental impact of their operations. This includes managing waste properly, reducing greenhouse gas emissions, conserving natural resources, and minimising the environmental impact of their products and services. In the future, it is likely we will need to agree targets between our

businesses to support us achieve our environmental goals.

Data Protection

Suppliers must protect Rank's confidential and proprietary information and must comply with all applicable data protection laws and regulations when processing personal data (including the UK GDPR).

Conflict of Interest

Suppliers must avoid conflicts of interest or situations that may appear as a conflict of interest in their dealings with Rank.

Supply Chain Management

Suppliers are expected to ensure that their own suppliers and subcontractors comply with this Code of Conduct and all applicable laws.

Monitoring and Compliance

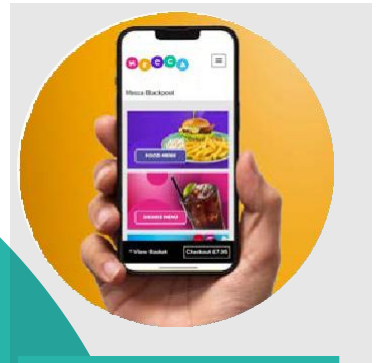
Suppliers should have systems in place to monitor and demonstrate their compliance with this Code of Conduct. They should be open to audits or inspections by Rank or an appointed third-party.

Grievance Mechanism and Reporting

Suppliers should establish and maintain a process for their employees to report concerns or illegal activities in the workplace without fear of reprisal, intimidation, or harassment.



A supplier code of conduct is key



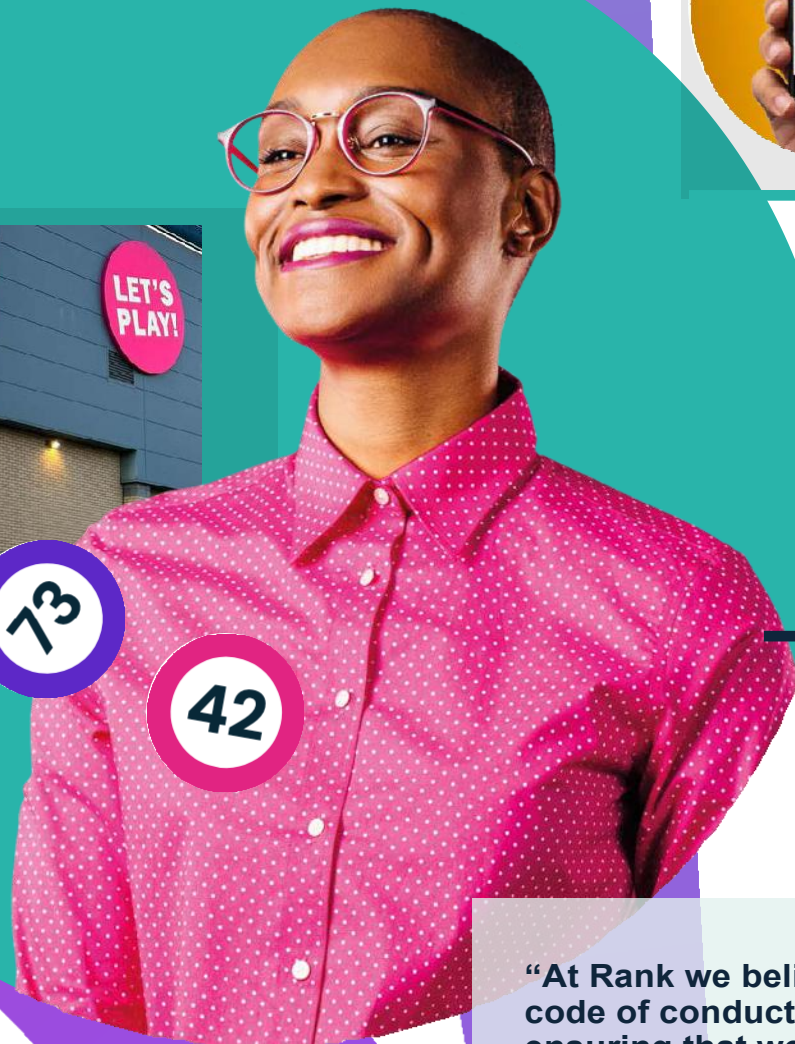
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“At Rank we believe a supplier code of conduct is key to ensuring that we adhere to the highest standards of governance, whilst ensuring our expectations concerning safe working conditions, fair and respectful treatment of employees, and ethical practices are clear to all those we partner with.”

Paul Swendell - Rank Director of Procurement

SUPPLIER CODE OF CONDUCT

What is the Code of Conduct?

Rank's Supplier Code of Conduct is our standards of conduct policy, which outlines the requirements that **everyone** working for and with Rank must comply with.

Why do we have a Code of Conduct?

Doing what's right means we must always act with integrity to ensure we are trusted by our customers, suppliers, colleagues, and the communities in which we work. Our Supplier Code of Conduct sets out what we expect from you for Rank to be able to achieve this.

Who is the Code of Conduct for?

The Supplier Code of Conduct should be followed by everyone working for and with Rank; that is, any supplier or third party contractor engaged by our suppliers, to do business.

What if I don't comply to the Code of Conduct?

You are required to support and promote Rank's long-standing commitment to conduct our business in compliance with the law, rules, and regulations; these are set out within our Supplier Code of Conduct. You should report any violations as soon as you are aware of any wrongdoing. It's simply the right thing to do.

Action will be taken, where necessary, should we be made aware of any breach and non-compliance with our Supplier Code of Conduct.

Our values

We're proud that our business is made up of enthusiastic and committed support partners, who have a desire to support us and Rank's core values details how we will work and how we behave to deliver the best experiences to our customers, shareholders, the communities we work in and the people we work with.

Every day, we rely on our supply partners to be aware of these values in order to deliver our promise to excite and entertain.



Ethical decision making

Suppliers shall conduct their business with integrity, honesty, and transparency. They shall maintain the highest standards of ethical conduct and avoid any conflicts of interest. Bribery, corruption, and unfair business practices are strictly prohibited.

What does this mean for me?

Simply put, we (Rank) expect you to:

- always behave in an ethical manner - taking pride in your actions and decisions.
- always comply with the principles and rules in our Supplier Code of Conduct to help fulfil our legal and regulatory obligations.

CORPORATE GOVERNANCE

Following the law

Rank operates across multiple countries. As well as complying with the Supplier Code of Conduct and all applicable UK laws and regulations, you are also required to comply with the applicable laws, regulations, and industry standards in the countries where you operate. This includes, but is not limited to, labour, health and safety, environmental, and anti-corruption laws.

Bribery and improper payments

At Rank, we conduct our business in an honest and ethical manner and therefore take a zero-tolerance approach to bribery and corruption. Our approach is simple - making, promising, or accepting **any** form of bribe is unacceptable, whether directly or indirectly.

What do we mean by a bribe?

A bribe is a financial or other incentive or reward for action (or lack of action) which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. It includes offering, promising, giving, accepting, or seeking a bribe.

Suppliers are therefore expected to comply with all applicable anti bribery and corruption laws (including but not limited to the Bribery Act 2010).

Gifts and Hospitality

When it comes to a bribe, gifts or hospitality of any kind or value you should never:

- give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received in return, or to reward any business received,
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure; or
- offer or give gifts or hospitality to customers except as set out in our [Policy](#) or, in relation, to VIP customers, in accordance with the Digital and Retail VIP Customer Policies in force.

Supplier Transparency

Suppliers shall provide accurate and transparent information about their products, materials, and supply chain practices. They shall strive to identify and mitigate any risks related to social, environmental, or ethical issues within their supply chains.

Rank operates a strict 'No PO, No pay policy'. All suppliers must go through the supplier onboarding process which ensures appropriate due diligence is conducted before being listed on the payment system. Failure to follow this process will prevent POs being issued to support prompt payment.

We have partnered with Alcumus to manage and avoid risks within our supply chain, and they will help to monitor Health, Safety and other sustainability related matters across our contractor network, aimed at the validation of the ethical practices in place. Suppliers that provide a service to our venues business will require the supplier, contractor or subcontractor to evidence 'Safe Contractor' status (or equivalent SSIP accreditation) as a prerequisite of supply.

Tax Evasion

Tax evasion is a criminal offence that involves the illegal underpayment or non-payment of tax. Rank is committed to acting responsibly when it comes to taxation through our Tax team and suppliers are expected to comply with all relevant laws.

Data Protection

Suppliers shall handle and protect personal data and confidential information in accordance with applicable data protection and privacy laws. You should implement appropriate measures to secure data and ensure privacy.

If you have access to our IT systems, you must only use them for legitimate work-related matters and comply with the terms of our acceptable use policy which is maintained by our technology team. If you have any concern relating to information security, please email our rist@rank.com address for further support.

Cybersecurity, Information Security and IT Compliance Requirements

Rank expects all suppliers and third-party partners to maintain robust cybersecurity practices to protect Rank's data, systems, and networks, and to meet or exceed the requirements of the UK Government's Cyber Governance Code of Practice. Where suppliers use technology or systems as part of service delivery to Rank's business, they must be able to demonstrate compliance with Cyber Essentials requirements and adherence to the following cybersecurity standards.

Suppliers must:

- Use of firewalls, anti-virus software, and intrusion detection systems.
- Encryption of sensitive data in transit and at rest.
- Multi-factor authentication for systems accessing Rank data.

Implement Security Controls: Maintain appropriate technical and organisational measures to safeguard against unauthorised access, data breaches, malware, and other cyber threats. This includes:

- **Compliance with Standards:** Align with recognised frameworks such as ISO 27001, PCI DSS, Cyber Essentials and GDPR.
- **Access Management:** Ensure that only authorised personnel have access to Rank's systems or data, and revoke access promptly when no longer required.

- Incident Reporting: Notify Rank immediately of any actual or suspected data breach, cyber incident, or compromise affecting Rank's data or systems. Provide full cooperation in investigation and remediation.
- Third-Party Oversight: Ensure that any subcontractors or service providers handling Rank data adhere to equivalent cybersecurity standards.
- Training: Provide regular cybersecurity awareness training to employees who interact with Rank systems or data.

Failure to comply with these requirements may result in termination of the business relationship and/or legal action.

Keeping our Suppliers Safe and Secure

Our Health and Safety (H&S) team is responsible for putting in place risk assessments, controls, training, and guidance to make sure suppliers can visit our premises - safely and securely.

What if I have any concerns?

If you have any H&S concerns, please raise them to your procurement point of contact at the earliest opportunity who will seek support from the H&S team to mitigate and remove the risk identified.

SOCIAL RESPONSIBILITY

With thousands of employees, millions of customers, and offices around the world, it goes without saying that we have an impact on our communities and our environment.

Our aim is to ensure that our social and environmental impact is positive. Through our links to local communities and our efforts to help our customers gamble responsibly, we want to be an industry leader in this and ensure we're operating responsibly... all of the time.

Inclusion and Diversity

Rank does not discriminate - or tolerate any form of discrimination - based on age, disability, sex, gender reassignment, pregnancy or maternity, race or ethnicity, religion or belief, sexual orientation, or marriage/civil partnership status. We promote and support equality, diversity, and inclusion in all our working practices.

Human Rights and Labour Practices

Suppliers shall treat their workers with dignity and respect, upholding the principles of human rights, aligned to international labour standards which sets out basic principles and rights at work. They shall provide a safe and healthy working environment and comply with local labour laws and regulations, including those relating to working hours, wages, and benefits. They shall not engage in or support any form of human rights abuses, involuntary labour, human trafficking, or any discriminatory practices. Forced labour, child labour, and any form of discrimination are strictly prohibited.

Rank expects all suppliers to uphold the highest standards of human dignity and wellbeing. Where suppliers provide or arrange housing or accommodation for workers, it must be safe, clean, and meet basic standards of health and decency. Workers must not be subjected to exploitative deductions, restrictions, or conditions linked to their accommodation. Poor or unsafe living conditions may be an indicator of modern slavery risk, and suppliers are expected to actively monitor and prevent such practices. This commitment reflects Rank's stance against modern slavery and our partnership with the Slave-Free Alliance.

Fair Treatment and Disciplinary Practices

Rank requires all suppliers to treat workers with dignity and respect at all times. The use of corporal punishment, physical or mental coercion, sexual harassment, or verbal abuse is strictly prohibited. Disciplinary practices must be fair, transparent, and proportionate, and must never endanger the health, safety, or fundamental rights of workers. Suppliers are expected to ensure that any disciplinary measures are lawful, clearly documented, and communicated to workers.

Environmental Responsibility

Suppliers shall minimise their environmental impact by adopting sustainable practices. This includes promoting waste reduction, and responsible use of energy and water. Suppliers shall comply with environmental laws and regulations and strive for continuous improvement in their environmental performance with appropriate policies and systems in place.

Under the requirements of Scope 3 emissions reporting, Rank will be obligated to report on emissions not only produced by the company and the activities owned or controlled by us, but also those that are produced indirectly produced by our suppliers. We will be requesting suppliers share environmental performance with Rank over the coming months to support our sustainability reporting.

Continuous Improvement

Suppliers shall demonstrate a commitment to continuous improvement in their business practices. This includes regularly reviewing and enhancing their policies, processes, and performance to align with evolving standards and expectations.

Monitoring and Compliance

Rank reserves the right to monitor supplier compliance with the Code. Periodic assessments or audits may be conducted to ensure adherence to the Code. Non-compliance may result in corrective actions and may impact our on-going relationship.

Collaboration and Engagement

We encourage collaboration and engagement between Rank and its suppliers to foster a responsible and sustainable supply chain. This can include sharing best practices, providing training and support, and promoting open dialogue.

Thank you for your continuous efforts, flexibility, and collaboration. It is your support that enables us to thrive in an ever-changing marketplace. We look forward to strengthening our relationship and achieving even greater success together in the future.