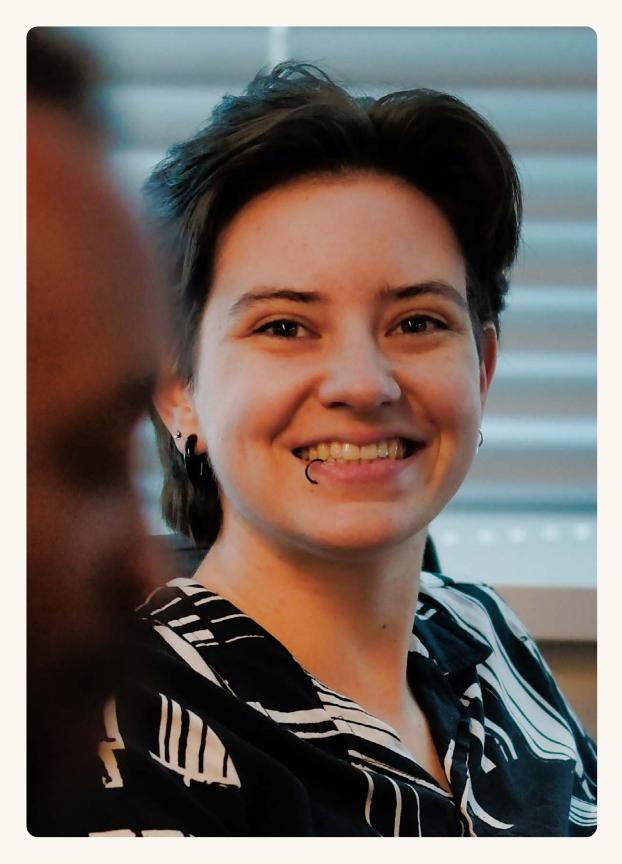


Generating long-term sustainable stakeholder value





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# 2024/25 Highlights

### **Customers**

### Aim: Deliver exciting and entertaining experiences in safe environments

### **Highlights:**

Exceeded our customer NPS target for the year and achieved a twopoint increase on last year's score

Completed independent review of our UK digital business's Markers of Harm model, enabling us to enhance our existing processes and strengthen the effectiveness of our framework

Won the European Safer Gambling Initiative Award for our development and use of our Hawkeye platform in the UK digital business

Introduction of Ethical Marketing Policy to formalise our approach

Increased safer aambling messaging in Enracha venues and improved accessibility of safer gambling information through introduction of QR codes in Grosvenor casinos

Through automation and centralisation of slots' play monitoring, we have improved the oversight of player behaviour on the gaming machines in our Mecca venues

#### How we measure progress:

Customer net promoter score ('NPS')



Customer feedback scores on safer gambling

Below target of 85%

**Employee NPS on safer gambling** 



Above target

UK digital customers using safer gambling tools

Below target of 43%

## Colleagues

### Aim: Be an admired employer

### **Highlights:**

Exceeded our employee engagement score target and achieved a four point increase on last year's score

Expanded our mentoring programme to another 250 colleagues

Implemented hiring manager interview training across Mecca, with subsequent rollout planned for the rest of the Group

Launched a programme of in-person strategy and engagement days for UK digital business

Expanded the Like to Love cultural change programme, designed to inspire both our team and customers to move from simply liking what we do at Grosvenor to truly loving it

### How we measure progress:

**Employee engagement score** 



Above target of 8 0

Percentage of women in senior roles



### **Environment**

### Aim: Reach net zero emissions by 2050

Achieved an above target reduction in carbon emissions, almost twice as large a reduction as we reached in 2023/24

Launched new Environmental, Waste, and Water Policies

Purchase all electricity in the UK and Spain from renewable sources via Renewable Energy Guarantees of Origin ('REGO') certificate and Power Purchase Agreement ('PPA')

Conducted a large-scale solar feasibility study across entire UK estate

Transitioned to in-house carbon emissions reporting

Completed Scope 3 emissions baselining exercise for UK portfolio

Received independent limited assurance of selected greenhouse gas emissions for the 2024/25 reporting period

#### How we measure progress:

Reduction in absolute carbon emissions tCO<sub>2</sub>e



### Please note, we previously reported 'Absolute carbon emissions'; moving forward, we will report the reduction in absolute carbon emissions. This represents reductions in our initial boundary of Scope 1, 2, and selected Scope 3

### **Communities**

# Aim: Support local communities through impactful partnerships and opportunities

Reached £4 million of funds raised for Carers Trust and celebrated the 11th year of our partnership with the charity

With a total of £401k, achieved a 10% year-on-year increase in funds raised for Carers Trust, and supported 687 carers this year

How we measure progress:

Total charitable funds raised



Above target

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# Enhancing the customer proposition across our brands and channels



It is with great pleasure that I welcome you to Rank's latest Sustainability Report. This report provides a comprehensive overview of our progress and achievements throughout the past year.

It details our performance against the eight key performance indicators (KPIs) that guide our efforts across four core focus areas: Customers, Colleagues, Environment, and Communities. Each year we set targets for the KPIs, and four of these KPIs continue to be linked to executive remuneration.

Furthermore, this report includes our disclosure against the Task Force on Climate-related Financial Disclosures ('TCFD') and the performance metrics aligned to the Sustainability Accounting Standards Board ('SASB'). This reporting positions the business to meet the future requirements of the International Sustainability Standards Board ('ISSB') which the UK Government plans to implement through the development of its own sustainability standards.

Our dedication to our customers remains paramount, with safer gambling being intrinsic to our approach. Through promotion of messaging and the availability of tools to support control of play, we empower our customers to gamble responsibly. We continue to advance our approach, introducing additional ways of raising awareness and new methods to detect at-risk play. This year, we commenced a pilot exercise to enhance safer gambling awareness for online customers through the use of display messaging while they are logged in and active. We were also particularly proud to receive the European Safer Gambling Initiative Award for our development and use of Hawkeye, our in-house live monitoring platform.

We have retained a safer gambling customer feedback score of 84% this year and we recorded an above-target customer Net Promoter Score ('NPS') of 54, which reflects the significant enhancements we have implemented in our product and service offering, including the introduction of new customer service portals for our digital brands.

Our colleagues play a vital role in our ability to deliver on safer gambling. We provide regular safer gambling training, including in our Spanish business where, while not required by law, we have developed training programmes for our colleagues in partnership with organisations that address gambling addiction. I am pleased to report a three-point increase in our safer gambling eNPS (which measures colleague sentiment on how Rank performs on safer gambling) to 72, exceeding our target for the year.

For our colleagues, our employee value proposition, 'Work. Win. Grow.', continues to be reflected across the colleague experience, enabling our team to thrive in an inclusive working environment through engaging work.

We have evolved our talent and learning strategy, introduced more places on our mentoring programme, launched in-person strategy days for our UK digital business, and advanced Grosvenor's Like to Love programme.

The success of these efforts is evident in the four-point increase of our employee engagement score to 8.3. We continue to promote equality, diversity, and inclusion across the Group. Our representation of women in senior roles stands at 32%, with further progress to be made, and we are pleased to report an improved mean gender pay gap of 11.7%, below the UK average of 13.1% (source: ons.gov.uk, 2024 data).

On the environment front, we have made significant strides forward on our Net Zero Pathway. This year, we achieved an above-target reduction of 5,520tCO<sub>2</sub>e in carbon emissions across our Scope, 1, 2 and selected 3 categories. We also formally launched our Environmental Policy, which enshrines our commitment to reducing our carbon emissions across our operations and reaching net zero by 2050, alongside our waste management and water stewardship policies. Regarding Scope 2 emissions, all our purchased electricity in the UK and Spain is now sourced from renewable sources, and we have completed our Scope 3 emissions baselining exercise for our UK portfolio, in addition to the exercise completed for the Spanish venues last year. Having now transitioned to in-house carbon emissions accounting, we have greater visibility and ownership of this crucial data.

Our commitment to the communities in which we operate remains steadfast. Our colleagues have close ties to their localities and a strong desire to make a positive difference. Throughout the year, our teams have actively fundraised and volunteered for a wide range of charities and organisations. Our Group-wide partnership with Carers Trust has been particularly impactful; we surpassed our fundraising target for the year, raising over £400k, and have now collectively raised over £4 million for the charity since 2014.

Underpinning everything we do is a best practice approach to Governance. Through the right training, policies, and procedures, we ensure that all our operations adhere to the highest standards of business ethics. We have also reviewed the Double Materiality Assessment conducted last year, completing a validation exercise with external stakeholders to confirm that our focus areas remain relevant and impactful.

I would like to extend my sincere gratitude to all our colleagues, customers, partners, and stakeholders for their continued support and dedication to Rank's sustainability journey.

Yours sincerely.

John O'Reilly Chief Executive

# Overview

### Who we are

Over the course of more than three-quarters of a century, Rank has entertained many millions of customers in Britain and around the world. The Group's story is one of iconic brands and talented people.

### **Our purpose**

To deliver exciting and entertaining experiences in safe, sustainable, and rewarding environments. We will achieve this through reflecting the changing needs and expectations of our customers, communities, and colleagues.

To excite and to entertain.

### **Our values**

Rank's culture encourages colleagues to take ownership of their roles and promotes collaborative working to create supportive work environments. Upholding our core values of Service, Teamwork, Ambition, Responsibility, and Solutions ('STARS'), our colleagues are empowered to play an active role in driving Rank's culture.



#### Service

We start with the customer. We do everything in our power to deliver special service every time.



#### Teamwor

We pull together across brands, channels, and locations to perform at our very best.



#### **Ambitio**

We challenge the way we do things and explore new ways to excite and entertain our customers, and outshine the competition.



### Responsibility

We understand our responsibility to all of our communities. We act with the highest integrity and honesty in everything we do.



#### Solutions

We act positively to get to the heart of problems quickly and find ways to solve them.

### **Grosvenor Casinos**



The UK's largest multi-channel casino operator with 50 venues. The brand offers a range of casino table games, including roulette, blackjack, baccarat and poker as well as electronic roulette and gaming machines, alongside bars, restaurants, and broader entertainment experiences.

### Mecca



Mecca is Rank's community-gaming brand for the British market. A national portfolio of 50 venues offering bingo, gaming machines, great value food and drink, and live entertainment.

### Enracha



Enracha is Rank's community-gaming business for the Spanish market. Nine venues offering a range of popular community games like bingo as well as electronic casino and slot games, sports betting, great value food and drink, and live entertainment.

### **Digital**





















Our digital portfolio includes our established market leading brands, Mecca and Grosvenor for the UK market, and Yo for the Spanish market. The Group also operates nine UK digital-only brands via our proprietary technology platform.

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**Overview** 

## Double materiality assessment

### **Purpose**

Conducting a materiality assessment is an effective means of establishing the material impacts, risks, and opportunities ('IRO') for our business. By undertaking a double materiality assessment, we can additionally understand sustainability issues from both an impact materiality ('inside-out') and financial materiality ('outside-in') perspective.

We completed a double materiality exercise in 2024, engaging stakeholders across the business. This year, we have advanced our assessment further by completing an external validation exercise. By completing this, we have enhanced our ability to manage sustainability risks, seize opportunities and either mitigate or maximise any negative or positive impacts, as well as positioning ourselves effectively to meet future regulatory requirements.

Previously, completing the double materiality exercise would have supported confirmation of the material European Sustainability Reporting Standards ('ESRS') disclosures on which the business plans to report, under the requirements of the EU's Corporate Sustainability Reporting Directive ('CSRD'). Following the omnibus in February 2025, we expect that Rank will no longer fall under the scope of the CSRD. Nevertheless, we recognise the best practice approach of assessing IRO from both an impact and financial perspective and have therefore maintained our double materiality register. Furthermore, the UK Government is currently developing sustainability reporting standards to implement the requirements of the International Sustainability Standards Board ('ISSB'), which has established the International Financial Reporting Standards ('IFRS') S1 and S2. Importantly, IFRS S1 requires companies to consider financial materiality.

### **Approach**

We established a robust process for the assessment. A clear methodology for identifying and assessing impacts, risks, and opportunities was required, whilst input from the Executive Committee, as well as subject matter experts from across the Group, was necessary to ensure that the assessment was accurate and complete.

Our sustainability consultants supported on the scoping and development of the process and discussed the process with auditors to ensure the approach taken was effective. The process was launched at Group-level, whilst the team in Spain also fed in to make sure that any IRO unique to their operating environment were factored into the assessment.

The assessment of the IRO considered first impact materiality, including scale and likelihood, and then financial materiality across the six prescribed parameters (cash flows, development, performance, position, cost of capital, and access to finance). Assessment factored in the preventative/mitigating measures in place and scored the IRO materiality over the short, medium, and long term.

The scoring system for financial and impact materiality was aligned to the Group Risk Register methodology, which scores risks as insignificant, minor, moderate, major, or severe (this was changed to 'significant' for this assessment to account for positive impact externally and internally). For impact materiality, this meant scoring each impact on a scale of 1 to 5.

For financial materiality, this meant scoring each risk or opportunity based upon its forecast percentage impact on cash as a percentage of Earnings Before Interest and Tax ('EBIT'). The percentage ranges used were the same as those in the Risk Register to maintain consistent methodologies for these related assessments.

For our internal engagement, individual reviews were conducted with 21 subject matter experts ('SMEs') across the business to assess and score the IRO identified relevant to their functions, as well as the corresponding preventative and mitigating measures in place. The consolidated results were reviewed by the Executive Committee and members of senior management. This year, we reviewed the double materiality workbook, assessing additional IRO that had been identified by SMEs, and updated any scoring as required.

Colleagues from across the Group informed the results of this assessment. To confirm that these results also reflected the views of our stakeholders outside of the business, we completed an external validation exercise. We surveyed individuals from all key stakeholder groups: investors, industry associations, regulators, charities, banks, suppliers, and customers.

For more details on our methodology and the process we undertook, please see our <u>2024 Sustainability Report</u>.

Read about how we address our material issues:

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Business ethics	18
Corporate governance	see Annual Report
Executive remuneration	see Annual Report
Financial performance	see Annual Report
Regulatory compliance	17
Risk management	see Annual Report
Supply chain management	19
Data privacy and IT security	20

#### Results

Through completing the double materiality assessment last year, we affirmed our understanding of the issues relevant to our business. The topics listed in the table are and will continue to be managed by the business and to inform our ESG strategy and reporting. The purpose of the double materiality exercise was to understand which of the impacts, risks, and opportunities underlying these topics had the most significant impact and financial materiality.

To do so, consideration was given to all the existing processes, policies, and management systems we have in place. Those costs that are already accounted for within our business-asusual outlook, and for which we foresee no related risks or opportunities arising across the short, medium, or long term, are therefore not of significant financial materiality. Similarly, where the business has an external impact, if an impact is already well managed, it does not have significant materiality. The results therefore highlight which underlying IRO are most material over the short, medium, and long term.

For our external validation exercise, we had over 400 responses, and the results reaffirmed that we are focused on the correct areas.

The following page shows the most material IRO from an impact and financial perspective. This report highlights how we are specifically addressing these IRO.

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### Description of impact, risk, or opportunity

- Actual: An impact, risk, or opportunity that <u>has</u> occurred during the reporting period
- Potential: An impact, risk, or opportunity that has not occurred during the reporting period

### Impact or financial

- Inside-out: An impact to the environment or society
- Outside-in: A risk or opportunity for the business's' finances

### Materiality in the short term

- An opportunity or a positive impact (Longer bar = more significance)
- A risk or a negative impact (Longer bar = more significance)

#### Materiality trend

- Stable: Materiality <u>stays the same</u> across the medium and/or long term
- Decreasing: Materiality <u>decreases</u> across the medium and/or long term
- Increasing: Materiality <u>increases</u> across the medium and/or long term

Customers  Duttomers eventure and cellular excitoring and entertacining experiences to our outcomers.  Deliver excitoring a college excitoring and entertacining experiences to our outcomers.  Deliver controlling by laboration of section and experiences to our outcomers.  Deliver controlling by laboration of the college experience in the college experienc	Issue	Potential or Actual	Description of impact, risk, or opportunity	Impact or financial	Materiality in the short term		Materiality trend
Customer service	Customers			-	,	High	
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regulator engulates and perspectation discoverage.  Collectioners service  Collectioners service  Collectioners  Collectioners	Customer service	A	High customer satisfaction results in higher NPS and positive reputational impact.	0-1			<b>②</b>
challengues    Colleagues   Some   Colleagues   Some   Som	Safer gambling	P		0-1			<b>②</b>
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to relevance of our proposition.  Executive remuneration  A Attractive renumeration package enables talent acquisition which drives business performance.  Financial performance  A Loss of banking debt facilities and/or clearing facilities could result in the Group being unable to meet its obligations as they become due.  Financial performance  A Continued cost and pricing pressures, together with changes to consumer behaviour, can impact trading performance.  Regulatory compliance  P Failing to comply with existing regulatory, legislative, codes of practice and licensing conditions could increase risk of financial penalties or regulatory action.  Financial performance  P Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty  P Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty		P		<b>6</b>			•
performance.  Financial performance  A Loss of banking debt facilities and/or clearing facilities could result in the Group being unable to meet its obligations as they become due.  Financial performance  A Continued cost and pricing pressures, together with changes to consumer behaviour, can impact trading performance.  Regulatory compliance  P Failing to comply with existing regulatory, legislative, codes of practice and licensing conditions could increase risk of financial penalties or regulatory action.  Financial performance  Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty  Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty	Regulatory compliance	P		<b>O</b>			•
unable to meet its obligations as they become due.  Financial performance  A Continued cost and pricing pressures, together with changes to consumer behaviour, can impact trading performance.  Regulatory compliance  P Failing to comply with existing regulatory, legislative, codes of practice and licensing conditions could increase risk of financial penalties or regulatory action.  Financial performance  Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty	Executive remuneration	A		<b>O</b>			<b>(2)</b>
impact trading performance.  Regulatory compliance  P Failing to comply with existing regulatory, legislative, codes of practice and licensing conditions could increase risk of financial penalties or regulatory action.  Financial performance  Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty	Financial performance	A		0-1			<b>②</b>
conditions could increase risk of financial penalties or regulatory action.  Financial performance  Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty	Financial performance	A		<b>O</b>			<b>(2)</b>
	Regulatory compliance	P		<b>6-1</b>			<b>(2)</b>
	Financial performance	P		0-1			

# Introduction from the Director of ESG

**Sarah Powell** 



I am pleased to present this year's sustainability report to Rank's stakeholders as, at Rank, we firmly believe that the long-term success of our business extends beyond our financial statements.

The disclosure in this report reflects our deep understanding of how environmental, social, and governance ('ESG') factors directly impact our financial performance, our resilience, and our ability to create sustainable value for all stakeholders.

The importance Rank places upon ESG performance has been reflected in the evolution of my role to Director of ESG (previously additionally being Director of IR). This signifies a refinement of our sustainability approach, elevating the strategic importance of this agenda within the business. This change also recognises the breadth of stakeholders with whom we engage on ESG-related matters, as well as the increasingly rigorous regulatory landscape governing sustainability disclosures.

Our four focus areas are well embedded into the business and have helped concentrate efforts in all our global locations and across each of our brands.

Each focus area is linked to our key performance metrics, and are underpinned by strategic aims:

#### **Customers:**

Deliver exciting and entertaining experiences in safe environments.

### Colleagues:

Be an admired employer.

#### **Environment:**

Reach net zero emissions by 2050.

#### Communities:

Support local communities through impactful partnerships.

We are increasingly seeing that strategic investments in sustainability drive economic value. This is by enhancing our top line through market differentiation, while also preserving our margins through operational efficiencies and risk mitigation.

This perspective was reinforced by our double materiality assessment ('DMA'), which determined the financial materiality of sustainability impacts, risks, and opportunities ('IRO'), and identified where the most significant risks to our business reside should we fail to manage our ESG impact effectively.

Throughout this report, we indicate the IRO which relate to each of our four focus areas. The disclosure then details how we are managing the impacts, mitigating the risks, and capitalising on the opportunities presented to the business.

For customers, naturally there is significant focus on the risks associated with gambling, and we employ extensive measures to promote safer gambling and prevent against the financial risk of failing to adequately protect customers from gambling-related harm. Aiming to be an admired employer reflects the importance of attracting and retaining talent and having an engaged and motivated workforce. We enumerate the many steps we are taking to elevate the colleague experience and to make sure we are listening to and meeting the needs of our employees.

This strategic financial approach is further illustrated in how we are investing in the decarbonisation of our operations to mitigate both the environmental impact and the financial implications of carbon emissions.

We recognise that to achieve our net zero ambition demands a truly considered, data-driven approach. Following the appointment of an Environmental Specialist this year to lead our environmental initiatives, our ESG team has undertaken a deep dive into the emissions footprint, understanding the data at a micro-level across all venues, and formulating a comprehensive plan to address global Scope 1, 2, and 3 emissions.

Our focus on environmental performance is already yielding financial benefits. Having signed a Power Purchase Agreement ('PPA'), and procured a Renewable Energy Guarantees of Origin ('REGO') certificate, we have effectively eliminated all our Scope 2 emissions arising from purchased electricity in Spain and the UK.

We have also made significant investments in building management control systems, and we are exploring on-site solar and degasification projects and fostering a culture of energy conservation among our colleagues.

These are strategic investments designed to deliver long-term, sustainable energy cost savings, insulate us from energy price volatility, and ultimately preserve our margins.

The efforts we are making are being recognised externally, and we were pleased to see an increase in our ESG ratings across the board.

I invite you to read this report to understand the depth of our commitment and the tangible progress we are making.

Sarah Powell

Director of ESG



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Rating body

### **FTSE Russell**

Focus

FTSE Russell assesses companies' exposure to and management of ESG issues, scoring companies on a scale of 0 to 5. Score

4.1

July 2025 3.9, June 2024

Performance

Improved score ⊕

Rating body

## **Sustainalytics**

Focus

Sustainalytics assess companies' unmanaged ESG-related risk and scores on a scale of 0 to 100, with lower scores indicating lower risk.

Score

25.3

May 2025 26.9, January 2025

Performance

Improved score ⊕

Rating body

### CDP

cus

CDP scores companies' disclosures on its questionnaire which focuses on environmental impacts. Scores range from A to D-, with non-disclosers getting an F.

Score

C

**April 2025**D, April 2024

Performance

Improved score ⊕

Rating body

### S&P

Focus

The S&P CSA measures ESG performance and management, scoring companies on a scale of 0 to 100, 100 being the maximum score. Score

36

2024 28, 2023

Performance

Improved score ⊕

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# Governance



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# ESG & Safer Gambling Committee Report

**Katie McAlister** 



I am pleased to provide a summary of the work undertaken by the Committee over the past 12 months and present the continuing development of our ESG strategy, progress against our objectives and detail on our plan to reach net zero by 2050.

The Group remains committed to ensuring the sustainability of its operations and continues to build a more resilient and responsible business. How we identify and consider ESG risk and opportunity is critical to the success of our business and meeting our stakeholders' expectations for transparency and disclosure.

Overall, I was pleased with progress made during the year. We can see good progress in a number of areas.

We published our 2024 Sustainability Report in September 2024, alongside the 2024 Annual Report and Accounts. This provided the foundations to develop Rank's ESG strategy during 2024/25 and I am delighted to publish our 2025 Sustainability Report alongside this report which is made available on Rank's website, www.rank.com.

### **Key activities**

During 2024/25, we continued to develop and strengthen our ESG focus within each of the business areas and have done a double materiality review. This was started in 2023/24. Results have confirmed that our initial areas of focus determined from the single materiality assessment remain relevant and appropriate.

Management of relevant business units are now reviewing performance monthly against ESG metrics, with simpler, standardised reporting allowing the committee to focus on the key areas.

The Committee observed the business is commencing a review of the disclosure requirements of the International Financial Reporting Standards ('IFRS') S1 and S2 (the standards established by the International Sustainability Standards Board ('ISSB')). The UK Government is currently developing sustainability reporting standards to implement the requirements of the ISSB, but these have not yet been published. Previously, due to its operations in Spain, Rank expected to be required to disclose against the EU's Corporate Sustainability Reporting Directive ('CSRD'). However, following the omnibus announcement in February 2025, we expect that the Group will no longer fall under the scope of the CSRD.

Management has again been assisted by Burson Buchanan in assessing, evidencing and reporting on environmental risks (leveraging the Group's corporate risk register) as it seeks to identify, prioritise and validate material issues that affect both risks and opportunities.

For more on CSRD see page 67 of the Strategic Report, Sustainability section within the Annual Report which can be found here: <a href="https://www.rank.com">www.rank.com</a>.

The Committee approved eight baseline KPIs across the four key priorities (Customer Experience, Colleague Experience, Environmental Management and Community Engagement – see page 3 for more) which underpin the strategy. Also approved were four KPIs for remuneration target measures – see the Remuneration Report for details on how this was implemented in our Annual Report.

The Committee Chair liaises regularly with the Chair of the Remuneration Committee on related aspects including remuneration incentives for ESG, including safer gambling and compliance. All the members of the ESG-SG Committee are also members of the Remuneration Committee.

Agendas from the ESG-SG Committee consider work and oversight by other committees and vice versa to avoid any unnecessary overlap and collectively the Board assesses the terms of reference of each Committee. During the year we considered how the working arrangements between the committee could be improved.

The Committee is regularly presented with updates regarding the Group's community work. Updates include an active drive to recruit from local communities and supporting colleagues with the ability to give back to their local communities and charities.

For more please see pages 65-71.



During 2023/24, the Committee began to report against eight baseline key performance indicators (KPIs) across the four key ESG focus areas that underpinned the strategy. This reporting continued in 2024/25 on the same basis:

### 1 Customer experience

Providing a safe, secure environment and personal experience, creating and maintaining good gambling behaviours and protecting vulnerable customers.

#### KPIs

Customer net promoter score ('NPS')

Customer feedback scores on safer gambling

Employee NPS on safer gambling

Percentage of UK digital customers using safer gambling tools

### 2 Colleague experience

Creating a fair, inclusive, and inspiring working environment which educates our people to enable and encourage positive gaming behaviours.

#### KPIS

Employee NPS

Percentage of women in senior roles

### 3 Environmental management

Ensuring that our operations minimise any negative impacts that Rank may have on the environment and reducing our carbon greenhouse gas emissions wherever possible.

#### (PIs

Reduction in absolute carbon emissions\*

### 4 Community engagement

Providing an essential social outlet for customers, generating lasting community spirit, driving community action, and developing a genuine social legacy.

#### KPIS

Total charitable funds raised

Please note, we previously reported 'Absolute carbon emissions'; moving forward, we will report the reduction in absolute carbon emissions. This represents reductions in our initial boundary of Scope 1, 2, and selected Scope 3 emissions.

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In the coming year, the Committee will be undertaking a review of the current KPIs to ascertain if they remain fit for purpose or whether any might need updating or replacing as the ESG strategy develops. The review considers Rank's ESG journey and trends and development in the wider industry. Appropriate benchmarking and advice will be taken from external consultants to support this process.

There is also ongoing work collecting and validating data which includes developing and maturing ESG KPI assurance processes and interactions in accordance with Principle 29 of the Corporate Governance Code 2024. Aspects of this were analysed and discussed by Committee members during the year.

### **ESG** initiatives

The Committee received business updates during the year to assess how the Group's ESG objectives aligned with the corporate and strategic objectives, see our Annual Report available on Rank's website, www.rank.com. for more information on the Group's strategic intents. The Committee is comfortable that Rank is progressing its development of ESG initiatives in support of the corporate strategy, and that this will enable the business to be managed in a sustainable and responsible way. The Committee expects continued development in each of the business areas and a commitment followed by meaningful actions to drive ESG considerations across all business decisionmaking. Committee meetings provide an opportunity to analyse the actions of management on ESG initiatives and to challenge accordingly. In particular, the Committee challenged managing directors of business units to improve diversity in senior management.

Working with each of the business units managing directors, the Committee has sought to further encourage ESG considerations across internal reporting. There is now monthly reporting by business units on ESG performance as well as the quarterly updates to the Committee. Such focus has embedded the necessity for each business area to ensure there is ESG alignment with the corporate strategic objectives and that this alignment drives the effective delivery of the strategy and of initiatives that underpin it.

### Customers, Colleagues, Environment, and Communities' KPIs

During the year the Committee ensured that progress in the the four focus areas (Customers, Colleagues, Environment and Communities) was measurable and challenged the business to determine the appropriate KPIs. Reporting progress against eight principle KPIs (four of which align to remuneration) to the Committee provides understanding of the Company's ability to track and evaluate progress and allows Board-level oversight of performance against strategy, in line with global best practice. During the year the KPIs were reviewed and assessed for appropriateness and relevance.

### See page 3 of this report.

Overall, there had been good progress although, as ever, the Committee challenges management to do more.

#### **Environmental KPIs**

There was progress against target in five out of the eight KPIs. Two targets were missed and one target was marginally missed.

### **Customer KPIs**

Efforts are ongoing to enhance the adoption of customer engagement with digital safer gambling tools where appropriate, and we continue to encourage customers to use the resources if needed.

The Committee notes that management is proactive and purposeful in seeking to improve safer gambling aspects within Rank and is an advocate of continuous improvement across the industry.

During the year the Directors of ESG and Public Affairs & Investor Relations met with the Betting and Gaming Council to establish a subcommittee on ESG in order that best practices across the sector might be shared for the benefit of all participants.

For more on Safer Gambling please see page 23.

### Colleague KPIs

Female representation in management was below target. The Committee discussed during the year the lower gender diversity in senior management and considered the plans presented by management to address this. Different business units had significantly different performances in this respect, reflecting core skillsets, availability of talent, current career paths and demographics.

The area of greatest challenge is female diversity in senior management in digital and within Enracha in Spain. In terms of developments in diversity and leadership, more can be seen on page 44.

We achieved a target engagement score of 8.3.

Please see pages 41-50 for more.

### **Community KPIs**

This was the eleventh year of fundraising for the Carer's Trust. Rank was pleased to raise £400,891 during the year and to achieve a milestone of £4m.

The Senior Independent Director was able to attend a meeting of a grant panel, which met to allocate funds raised by Rank to individual carers who had applied for a grant. The meeting brought to life the important impact Rank's relationship with Carers Trust makes to individuals in the local communities. For more please see pages 60-70.

For more on Rank's community involvement see page 65 of this report.

### Work culture and learning and development

See also pages 41 to 50 for more information on insights into Rank's culture and colleague engagement in the year. The Board is committed to Rank having a positive working environment and both listening and acting upon the views of colleagues.

During the year the Director of Communications and Engagement presented "Love to Learn", which is a programme that enables more access to flexible learning and education in the workplace.

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PepTalk – an external learning hub that delivers learning through storytelling – continues to grow with active users across the Group engaging in short, story-led weekly sessions.

Udemy, a premier online learning platform, is also being developed and better promoted to achieve higher uptake. The online platform offers an extensive array of courses across diverse fields such as technology, business, personal development, and more. At present there are more than 200 active users who are engaging with content tailored to their specific roles and functions. The online learning environment enables users to take exams and earn recognised qualifications.

Additionally, Rank is developing a learner engagement strategy to seamlessly integrate Udemy's offerings with our core people practices, including onboarding, appraisals, and career development pathways.

There is also a mentoring calendar of events with mentoring of individuals by way of Mentoring@Rank. During the year the business also partnered with Mentorloop to develop Rank's mentoring programme.

Thirty-one senior leaders attended masterclasses with the Henley Business School. A further ten colleagues were enrolled in classes with The Henley Partnership through a corporate membership scheme with The Henley Business School, part of the University of Reading. This provided transformative professional development through online learning.

For more on Training & Development see pages 42-43 of this report.

### Solar panels, degasification and boiler efficiency

During the year the Committee reviewed a report on a net zero site audit and venue-specific environmental recommendations were considered for investment. As part of this, a report from management was presented on the feasibility of installing solar panels on various sites. Individual sites were being considered for their appropriateness and a business case would be prepared to trial the technology in a small number of locations.

An audit of potential degasification of venues was also reviewed by the Committee. The audit had been carried out to understand how to remove gas based heating and hot water. This will primarily be achieved through air source heat pumps, electric heaters and heat pump systems. The next stage is to stress test the sites for feasibility and cost, with input from an external consultancy. The Committee will oversee the process and consider the proposals on their merits.

The Committee was also provided with progress on boiler replacement following an audit of the estate. Where boilers had reached end of life they would be replaced by more energy-efficient models. Sites were being prioritised and various models of boilers were being trialled and assessed. To assist in the ongoing development of the net zero plan, an environmental manager was recruited in October 2024. The plan for net zero for Spain had been progressed with finalisation of the decarbonisation plan for Scope 1 and 2 greenhouse gas emissions and completion of a Scope 3 baseline exercise for the UK in 2025. Focus areas to reduce emissions for the future included improved data collection from suppliers on Scope 3 emissions and encouraging supplier emission reduction, further building employee engagement and auditing of regular purchases to identify where savings could be made. The setting of goals and developing a communications plan, training resources and a supplier incentive programme will occur in the next 12 months.

#### For more on net zero see page 52 of this report.

### Waste management

A waste and water management agreement with Biffa entered into in 2024 included a target saving of 50%. Currently the business recycles 48.8% of its waste and is seeking to improve on this

On 31 March 2025 Rank launched Simpler Recycling with Biffa in response to Government harmonisation of waste and recycling services across the country in order to increase waste segregation and improve recycling rates generally.

#### Net zero

The Committee oversaw Rank's carbon management work through the Net Zero Working Group (NZWG) and the progress made to develop its reporting framework in line with the Task Force on Climate-related Financial Disclosures (TCFD). See page 52 on our Net Zero Pathway for more information.

The Committee considered the recommendations made and actions taken in regards the Net Zero Pathway, which set out a measured approach, and the establishment of an interim greenhouse gas emissions reduction target to be achieved by 2035, alongside the longer-term target of achieving net zero by 2050

During the year gas use (Scope 1) reduced by 14%, in part due to warmer weather, the closure of a small number of venues and efficiency efforts. The Company signed certified green

electricity agreements for the UK and Spain in January 2025. This led to a reduction of 51% in electricity (Scope 2) emissions compared with the previous year. Overall, Scope 1 emissions reduced 16% and the business exceeded its target of a reduction of 4,604 tCO $_{\rm 2}e$ .

The Committee reviewed and approved the net zero plan for 2035. This plan includes a reduction of 12% in emissions, green energy certification for the UK in January 2025 (-28% emissions) and completion of the feasibility study on degasification (-41% emissions). This will be implemented by 2035

Energy usage by carbon emissions had dropped during the year by 25% to 16,498 tCO $_2$ e (Group-wide) through a combination of energy efficiency, warmer temperatures and a reduction in Scope 2 electricity emissions.

### Climate change and Task Force on Climate-related Financial Disclosures

The Committee has worked alongside the Audit Committee in determining the TCFD-aligned disclosures set out in this Annual Report, along with the Remuneration Committee to link sustainability performance to executive remuneration that further embeds the imperative of responsible operating practices into Rank's core culture.

### For more see pages 56-63 of this report.

There has been interest from the investment community on how climate change impacts companies. We recognise that there are both internal and external expectations on us to establish a clear greenhouse gas emissions reduction strategy in line with international climate change targets and we have set Rank on a credible carbon Net Zero Pathway. The Committee is also cognisant of the new requirements under UKLR 6.6.6R(8), which the Group is required to adopt this year, to include a statement in this Annual Report setting out whether our climate-related financial disclosures are consistent with the recommendations of the TCFD. Our disclosures can be found on pages 56-63.

### Safer gambling

Safer gambling remains the Group's primary focus area and a core pillar of Rank's strategic objectives. The Committee continues to emphasise the importance of safer gambling within Rank's wider ESG framework and the Committee is comfortable that there is a strong focus on this area by the business as a whole and by the leadership of respective business units.

The Committee continues to emphasise the importance of safer gambling within Rank's wider ESG framework and the Committee is comfortable that there is a strong focus on this area by the business as a whole and by the leadership of respective business units.

Whilst there remains no industry standard KPIs we continue to evolve the measures that we review in the Committee alongside the management deep dives and other activities that come to the Committee.

The Committee was pleased to note that in the October 2024 and May 2025 employee opinion surveys, that colleagues rated Rank highly for its performance on safer gambling and the willingness of the business to take sensible measures to protect vulnerable individuals. For more see page 46.

During the year the Committee received reports from the managing directors of each business area to provide updates on safer gambling initiatives. These initiatives took a 'customer-first' approach to enhancing existing player protection measures, as the Group continues to evolve its user journeys and deliver targeted improvements for those players who need our support.

We also considered changes resulting from new regulatory requirements and industry consultations and commitments. We engaged with the Government and with the Gambling Commission on consultations and proposals and have sought to educate and inform members of Parliament of the value to the community that our venues bring.

The Committee received reports and analysed the developments being made to further strengthen the safer gambling culture throughout the Group. The work being undertaken is to ensure that the business continues to instill a group wide approach to the processes and behaviours our colleagues employ to achieve Rank's purpose and to deliver exciting and entertaining experiences within a safe environment.

To best equip our colleagues with the skills and understanding to recognise players that are potentially at risk of problem gambling, we have conducted extensive employee training. Every employee must complete mandatory safer gambling training on an annual basis, with progress and training completion rates monitored through our online training platform. Additional training is provided as required or according to a particular role's needs.

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### Support and training

We continue to provide support to anyone affected by gambling related harm through chatrooms, a helpline, a forum and other self-help resources, as well as face to face meetings. We also direct individuals to the right institutions which can provide further assistance.

Following GamCare's decision to cease its training operation in November 2024 we carried out a full review of the Group's safer gambling training to ensure that it adequately includes training includes development of the important skills to engage customers in safer gambling conversations. We shortlisted two training providers who conducted trial sessions in May 2025. Since then we have selected the preferred supplier and work is underway on potential training rollout and costs. We will be holding a trial session with the Grosvenor Leadership Team prior to final sign-off which is planned by the end of August.

### Early-stage engagement and technological developments

The Committee noted that Grosvenor had improved the safer gambling environment through earlier stage customer engagement and had provided an advanced training programme on safer gambling for venue managers. Grosvenor had recruited new Player Protection Managers for venues and had redesigned the risk app used by colleagues to ensure key decisions are taken by local management with good local knowledge of customers. A new case management system was also being implemented to improve workflows and to improve the quality of information delivered to decision makers.

New financial vulnerability checks at Mecca were implemented to assess risk at a £150 loss and there were some game redesigns to reduce the risk of harmful play, for example removal of quick play and a reduction in spin speed.

### Awareness raised and self-help promoted

The business also raised the safer gambling profile and features of safer-gambling tools with customers through marketing campaigns focusing on safer gambling and self-help measures allowing them to take control to better manage their own risk profile. This work will continue in 2025/26 with a renewed focus of customers using the safer-gambling app.

### Legislative changes

The business continued its focus on the Gambling Act review changes in respect to new online slot staking limits, financial risk assessments and improving direct marketing preference controls.

The Committee received several updates on the same throughout the year on how regulatory developments would impact customers and was able to assess management's response to the opportunity and risk these developments presented.

Operational changes to the online maximum stakes limits (£5 maximum staking per spin, £2 for under 25's) were made to comply with legislation effective April 2025. Changes to online marketing preferences to allow customers to select market preferences for each product vertical (casino, bingo and sports) were made in May 2025.

### Safer gambling horizon scanning and industry collaboration

The Committee regards safer gambling as a high priority topic for the Company's stakeholders and an important part of its work is to consider their views on the Company's approach.

#### See page 23 on safer gambling in this report.

The Committee recognises that the Company cannot simply look at the initiatives it has in-train as a reaction to regulation, but must also proactively consider customer, regulator, colleague, shareholder, political and wider public sentiment in its plans.

The Committee receives regular reports from the Director of Corporate Affairs and Investor Relations to ensure that it remains up to date on external sentiment, influences, developments and political change. It challenges the business to ensure that it considers such views in all projects and initiatives across all workstreams.

During 2024/25 the Director of Corporate Affairs and Investor Relations presented regular updates on legislative progress of the Government's White Paper proposals on gambling and regulatory reforms. Following a change of Government, and some delay, the first Statutory Instruments for proposed landbased casino reforms were laid before Parliament in April and May 2025 and came into force on 22 July 2025. The Committee continues to consider stakeholder views and those of the industry and media during ongoing consultations and any legislative developments.

Rank's contributions to the Government's review have also extended to shaping responses from the Casino Chapter within the Betting and Gaming Council (BGC'), the BGC itself and the Bingo Association, all of which are important voices in respect of regulatory change. We continue to have representation on the Bingo Association and BGC's committees and their working groups, including all those specific to land-based gaming. We recognise the importance of our contributions aligning with our industry peers and we work hard to ensure that Rank's proposals and arguments are in tune with our peers.

### Research, Prevention and Treatment (RPT)

During 2024 Rank upheld its voluntary commitment to RPT (Research, Prevention and Treatment) and for 2025 is to pay a new Statutory Levy to the Gambling Commission to fund RPT research.

During the year the business received a report on gambling research through the University of Liverpool, the funding of the YGAM educational programme for a sixth consecutive year and the making of a direct payment towards GamCare for its ongoing work in treatment of gambling-related harm.

### ESG & Safer Gambling Committee evaluation

It is incumbent on the Board, to ensure that a formal and rigorous review of the effectiveness of the Committee is conducted each year. This year, Rank's evaluation exercise focused at the Board level, facilitated externally by Lintstock Limited. As part of the process, questionnaires were circulated on whether the Committee was operating effectively.

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The Committee's work was rated very positively. It was commented that the structure and content of the meetings were improving, with greater clarity of the papers thereby enabling the Committee to focus on the right areas and to engage in meaningful debates.

The Committee's progress against last year's actions and focus for the year ahead are set out below.

### Focus areas for 2024/25

The focus areas for 2024/25 were:

- 1 Ongoing evolution around ESG planning, targeting, measurement, and reporting was seen to be required with progress on refining KPIs and monitoring player protection KPIs being key priorities.
- 2 A broad review of current market practices and considerations on safer gambling is to be undertaken to assist on industry understanding.
- 3 The Committee was to be supported with additional training on environmental considerations in order to obtain a clearer focus.
- 4 Double materiality was to be considered and the Committee was to be supported to understand fully the implications for the Group.

### Progress made during 2024/25

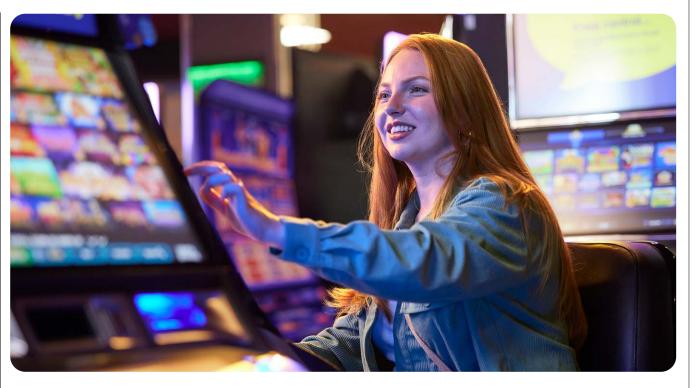
The Committee had:

- 1 Monitored the evolution of KPI targets and had considered options concerning metrics for safer gambling.
- 2 Overseen the ongoing work on developing player protection KPIs and considered competitors' key data to benchmark performance.
- 3 Sought to verify the quality of ESG metric data and had encouraged management to develop an Executive Summary to assist with this.
- 4 Considered how assurance of KPI data was to be achieved. The assurance process had been agreed with the assistance of Internal Audit and the Audit Committee. A roadmap for 2026 and 2027 assurance had also been laid out.
- 5 Reviewed the progression of Double Materiality Assessment (See Double Materiality Assessment page 6.)
- 6 Noted the proposals for training on carbon emissions for Committee and Board members.
- 7 Reviewed the proposals by management to make ESG relevant to the daily activities of employees in a way that would drive a competitive advantage and benefit the business and relevant stakeholders.

### Focus areas for 2025/26

The focus areas for 2025/26 were:

- 1 Committee members would benefit from focused training in connection with safer gambling which would take into account the operating procedures of industry peers and the KPIs used to measure performance.
- 2 Safer gambling metrics were to be analysed through a deep dive which was to include peer review. Selecting the right metrics was important and would help with performance and stakeholder engagement.
- 3 The issue of culture and community as a remit of the Committee was to be reviewed with consideration to tightening the Committee's scope.



### In conclusion

Rank recognises the importance of ESG across all its operations and wishes to ensure it creates a sustainable and resilient business which operates in the interests of all our stakeholders.

By working closely with our Board colleagues and all of Rank's committees, the Committee is looking to include ESG into all relevant areas of the business. The increased clarity to measure progress through the KPI measures will be critical to aid the Committee in ensuring Rank remains aligned to its strategy and protects and grows shareholder value.

We remain committed to providing a safe gambling environment for customers to enjoy the services that we offer. We aim to work constructively with regulators to ensure ongoing compliance with regulatory requirements.

We continue to develop a collaborative approach to safer gambling matters such as improving the identification of vulnerable customers. As Rank continues to focus and strengthen its cultural values throughout the organisation this will ensure that safer gambling underpins all aspects of our decision-making.

On behalf of the Committee, I look forward to reporting on the continued progress that is being made and will be happy to answer any questions on this report at the forthcoming Annual General Meeting.

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Katie McAlister

Chair of the ESG & Safer Gambling Committee

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### **Governance framework**

### **ESG** management

Our sustainability strategy is articulated through four focus areas: Customers, Colleagues, Environment, and Communities. This strategic framework has enabled us to define clear aims within each area, supported by specific KPIs that measure our progress and impact. Crucially, four of these KPIs are directly linked to executive remuneration. This underscores our unwavering commitment to operating responsibly, and ensuring that the pursuit of these objectives is incentivised and driven from the highest level of the business.

While our overarching ESG strategy is defined at the Group level, the four focus areas serve as a unifying framework for our business units. Regular updates from the business units are structured around these pillars, demonstrating how our Grouplevel ESG ambitions are being effectively operationalised and embedded within their day-to-day activities.

The Board retains ultimate responsibility for defining the Group's overarching ESG strategy, a mandate supported by the oversight and expertise of the ESG & Safer Gambling Committee. Regular progress updates are presented to the Board by the Committee Chair, whilst the Risk Committee informs the Board of any evolving or emerging sustainability-related risks.

At management level, our Director of ESG is responsible for the operationalisation of our sustainability strategy. Formerly also responsible for IR, the refinement of this role reflects the importance we place on ESG. Our Director of ESG leads the ESG Working Group ('ESG-WG'), comprising representatives from across all business functions, and reports directly to the ESG Steering Group ('ESG-SG') at Executive Committee level.



#### Customers

We are committed to delivering excitement and entertainment to our customers, whilst also providing a safe environment in which to enjoy those experiences. A robust safer gambling strategy that includes messaging, customer interactions, tools, and products is managed on a day-to-day basis within the business units under the direction and oversight of the Managing Directors of each business unit, and in consultation with the Director of Responsible Gambling and Compliance to ensure adherence to the laws and regulations that govern their relevant jurisdictions.

The ESG & Safer Gambling Committee meets every quarter to receive updates, from the Managing Directors and the Director of Responsible Gambling and Compliance, on all matters pertaining to player protection, and any findings are then reported to the Board. Our Chief Executive has ultimate responsibility for the business's interaction with customers, including engagement, ethical marketing, and the direction of the Group's safer gambling approach.



### Colleague

We want to support and develop our colleagues at every stage of their journey and therefore take a comprehensive view of the employee lifecycle. To effectively manage our people and culture function, we have structured it around the following key areas:

1) Business Unit People Directors; 2) Reward, Performance, & Operations; 3) Communications & Engagement; and 4) Talent Acquisition, Talent Development & Learning.

The function is led by our Chief People Officer, who is ultimately responsible for the implementation of our people and culture strategy, plans and actions, and who reports to the Board and provides regular updates on culture, capability, succession and development, and ED&I to the Nominations Committee.

Accountability for management of teams then flows down through the People & Culture Business Partners and leaders and managers. There is a regular Board agenda item on colleagues and a reporting cycle which we set annually, as well as a biannual detailed discussion on colleagues on the ESG & Safer Gambling Committee agenda.



#### **Environment**

This year, we appointed an Environmental Specialist to spearhead our decarbonisation efforts. They now chair the Net Zero Working Group ('NZWG'), which is also attended by our Director of ESG. The NZWG is supported by external consultants with environmental management expertise and is developing a strategy to reach net zero emissions in line with our targets. Further details on our governance of climate-related IRO can be found in the TCFD section, page 56.



### Communities

Beyond entertaining people, we recognise that we play a pivotal role in the communities in which we operate. At Rank, a key focus is on providing employment opportunities in the communities in which we operate. We continue to strengthen our collaboration with job centres and other employment-focused organisations, partnerships which support individuals through core training and development, with a clear pathway into roles within our business. Our venues often serve as a social hub, and our Mecca venues, in particular, are a key place for social interaction.

A KPI for every club's General Manager is to deliver on community-based engagement. While our partnership with Carers Trust focuses a lot of the Group's fundraising efforts on supporting the valuable work of unpaid carers, the nature of other community engagement activities is driven by local need, from providing spaces in our venues for groups to use as meeting places or for events, to employees fundraising for charitable causes that are close to their hearts. This venue-based approach resonates with our employees, creating tangible impact in the communities in which they live. Within Mecca, we recognise that our community engagement resonates strongly with our customer base and is therefore a key part of the value we deliver for customers. Hence, our Mecca Managing Director leads on the community strategy, ensuring it is integrated into 'business as usual'.

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The Rank Group Plc

Sustainability
Report 2025

### Regulatory framework

We hold licences in all the markets we are required to, which are Great Britain, Spain (in Andalusia, Catalonia, and Madrid), and Gibraltar, and we are subject to the laws and regulations of each jurisdiction. The regulatory bodies in each location are the Gambling Commission in Great Britain, La Dirección General de Ordenación del Juego ('DGOJ') in Spain as well as the regional authorities in Andalusia, Catalonia, and Madrid, and the Gibraltar Regulatory Authority.

We hold the relevant operating licences and land-based venues licences in each jurisdiction, as well as individual Personal Management Licences for those in key management roles. We also hold Personal Functional Licences for specific gaming roles within our casinos.

As a minimum, we operate in line with the regulatory requirements set out by the local authority in each jurisdiction. In the UK, gambling legislation is advanced and far-reaching and, as such, the measures we have in place to promote safer gambling are well-established and recognised by customers and colleagues alike. Our Safer Gambling Policy in the UK sets out our approach to promoting responsible play. The Compliance and Responsible Gambling Committee tracks and approves any changes to policy and procedure and monitors the effectiveness of our approach to safer gambling internally.

In Spain, there are fewer legislative requirements for measures to protect customers than in the UK (although the requirements that are in place are more prescriptive); nevertheless, we are committed to creating safe environments for our customers to play in, guided by the wider Group's approach to safer gambling.

In the UK, we use third-party specialist training companies to support with enhanced training for our customer-facing colleagues. In our Spanish business, we work with a UK-based gambling addiction charity, Gordon Moody, and a Gibraltar-based safer gambling consultancy, Better Change, to deliver training for our Spanish venues' teams.

To maintain strong working relationships with the regulators in each operating location, we strive to be both collaborative and responsive. By notifying regulators of immediate concerns and engaging with and responding to regulator consultations, we demonstrate our commitment to being a responsible operator. We attend regulator workshops, key stakeholder meetings, and regulator conferences at every opportunity.

We review the effectiveness of our framework of compliance controls on a regular and ongoing basis. In doing so, we examine guidance and public statements issued by regulatory bodies as learnings for the gaming industry. We also evaluate best practice guidance and other recommendations for improvements issued to Rank following compliance assessments.

### Industry associations and accreditations

We believe it is important for leading companies within the sector to share knowledge and information, to advocate for improved standards, and contribute to discussions on policy changes and new regulation in the sector. Through our membership of industry associations in the UK, Spain, and Gibraltar, we continue to drive progress and positive change in our industry.

We are members of the Betting and Gaming Council ('BGC'), which represents our interests in terms of our land-based casinos and digital businesses in the UK, and sit on multiple BGC committees, including the Compliance Directors Forum. This year, the focus has continued to be on the industry's responses to the Gambling Act Review consultations and making sure that the timelines for implementation of changes are feasible to enable operators to promote customer safety whilst maintaining a seamless customer experience.

The Bingo Association ('BA') is the trade group for all licensed bingo operators in Great Britain. We attend their quarterly Compliance Committee meetings and we have continued to work with our peers in the bingo industry to respond to the proposed changes from the Gambling Act Review consultations.

In Spain, we are members of Jdigital, the country's online gambling trade association, as well as land-based bingo associations in the three regions where we operate: ASOBING (Andalusia), AEJEA (Catalonia), and ASEJU (Madrid).

Rank makes financial contributions in support of research, prevention, and treatment ('RPT') of problem gambling. The payments cover the April 2024 to March 2025 contribution year, with all payments made in advance of the 31 March deadline. The total contribution was £700,540, which was distributed as follows: £470,540 to GamCare, £115,000 to University of Liverpool, and £115,000 to YGam.

In April 2025, a new statutory levy came into force that requires gambling businesses to provide a percentage of gross gambling yield ('GGY') to fund RPT. From the final quarter of 2024/25 onwards, Rank will therefore contribute under the terms of the statutory levy as follows: 0.2% of GGY for UK land-based bingo, 0.5% for land-based casinos, and 1.1% for UK digital revenues. For Q4 of 2024/25, the total donated under the levy will be £1.14m (£66k from Mecca, £432k from Grosvenor, and £646k from UK digital).

We have previously worked with the organisation GamCare to provide safer gambling training to colleagues and to have our safer gambling approach reviewed and accredited. In December 2024, GamCare announced that it would no longer offer a training service but nevertheless completed the training which it was scheduled to provide to our colleagues up to the end of December 2024. We are exploring options to work with another provider to deliver external training going forwards.

In January 2025, we commissioned a third party to conduct an independent review of our Markers of Harm model, used by our online business to identify customer who may be at risk of gambling harm, and we are taking forward actions from this assessment.

Rank is a constituent company of the FTSE4Good Index Series, which is designed to identify companies that demonstrate strong environmental, social, and governance practices measured against globally recognised standards.



FTSE4Good

Total contributions in support of research, education, and treatment

£700,540



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### **Business ethics**

### We uphold the highest standards of business ethics and expect all employees to act in accordance with these standards.

Our guidelines for professional conduct are enshrined in our Group policies, including but not limited to those relating to Anti-Money Laundering ('AML'), Anti-Corruption and Bribery, Data Protection, Disciplinary Procedure, Grievance Procedure, Whistleblowing ('Speaking Up') and Health and Safety, as well as our Code of Conduct.

### **Anti-money laundering**

We are resolutely committed to preventing gambling from being exploited for criminal activity and adhere rigorously to anti-money laundering ('AML') regulations in all jurisdictions in which we operate. We employ specific models within our business to pinpoint potential AML risks that necessitate enhanced scrutiny, continuous monitoring, and rigorous due diligence checks. Furthermore, we maintain a comprehensive anti-money laundering policy, coupled with targeted training programmes, to proactively prevent money-laundering across our organisation.

All employees are provided with AML training, ensuring a baseline understanding of their responsibilities in combating financial crime. We deliver additional training to employees in roles with heightened AML exposure.

Our Hawkeye 'pilots', who form part of our player protection team for the digital business and are responsible for operating our digital play live monitoring system, are equipped to identify potential fraudulent behaviour. They receive enhanced due diligence ('EDD') training, which incorporates comprehensive anti-money laundering ('AML') awareness and enables them to recognise specific triggers that warrant further investigation and escalation.

In the UK venues, there are various tools used to monitor for fraudulent behaviour, including the monitoring of spending levels. There are trigger points at which enhanced due diligence conversations will take place, requests for documents will be issued, or a meeting between the customer and a venue colleague will be required. The player protection teams have oversight of this for our venues in the UK.

This year, we have also delivered in-person training to almost 200 support office colleagues located in Gibraltar and the UK to enhance AML awareness. Each session lasts between two hours and six hours depending on the type of role we are delivering the training to.

In our Spanish digital business, we are collaborating with key national agencies to strengthen AML defences. We are currently working with the DGOJ (the regulator in Spain), SEPBLAC (the Spanish financial intelligence unit), and the national police force, on an initiative designed to reduce the risk of citizens' exposure to money laundering.

The Spanish digital business also undergoes an annual independent audit specifically focused on money laundering compliance.

Reports on business ethics and compliance aspects of internal controls are submitted to the Board's Audit Committee on a regular basis from, amongst others, the Group's Money Laundering Reporting Officer.

Number of hours per employee who undertook AML training

0.5

### Whistleblowing

To maintain a culture of transparency and accountability, we want our colleagues to feel empowered to raise concerns without fear of reprisal. To this end, we have a comprehensive whistleblowing programme, designed to facilitate the reporting of potential issues and ensure that such matters are addressed promptly and effectively. Our whistleblowing policy, Speaking Up, applies across all our locations, providing a consistent framework for reporting and investigating concerns globally.

The programme is operated by an independent third-party service provider. It has multilingual accessibility, meaning that colleagues in any of our locations can communicate in their local language. The service is available 24 hours a day, seven days a week, and reports can be made online or by telephone. The programme guarantees the anonymity of individuals reporting concerns, and our whistleblowing policy stipulates that there will be no retaliation against individuals who make a report.

Reports received by the independent service provider are then submitted to the responsible individuals in the Group for investigation. The Group General Counsel in the UK receives all reports and is responsible for managing an internal investigation, if required (with the exception of reports originating in Spain).

In Spain, due to regulatory changes, reports originating from the country must now to be submitted to an individual who is a resident in the country for investigation, and so the Spanish HR Director is now responsible for this. A bespoke approach is taken to each investigation, with subject matter experts brought in as required to ensure a thorough and impartial assessment.



All reports are treated with strict confidentiality, and identified concerns are referred to appropriate managers within the Group for investigation and resolution.

We actively publicise the availability of the Speaking Up programme to ensure that all colleagues are aware of their rights and responsibilities. We promote its availability periodically, by delivering annual awareness training, having signage displayed in our support offices, and making it readily accessible on our Group-wide colleague engagement platform, Connect.

We also encourage colleagues to raise issues directly with their line manager, if they feel comfortable doing so, and in Spain, colleagues can also raise concerns directly with their HR Director.

The Group General Counsel oversees our legal, data protection, compliance, and health and safety teams, and reports directly to the CEO. In Spain, the HR Director reports to and escalates any serious issues to the International Managing Director. The Board is also made aware of whistleblowing incidents via the Audit Committee, which receives an analysis of all reports submitted via the Speaking Up programme.

In our Spanish venues, we have an independent whistleblowing channel for suppliers and customers. The procedure is operated by our external AML supplier for Enracha. Signs in the venues include the contact details through which individuals can submit a report.

Number of reported cases of unethical behaviour or corruption

**Zero** 

Total number of hours of staff training on anti-corruption

21,344

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## Supply chain management

Managing a varied supply chain over multiple jurisdictions, coupled with the complexities inherent to operating in a highly regulated industry, requires an experienced and effective procurement function.

Our procurement category managers each focus on a different area of the Group's value chain, including technology, gaming, food and beverage, and marketing.

To support continuity of our service offering, we seek to engage high quality vendors. We conduct market research to understand supplier performance and ensure we have a supply chain that is fit for purpose.

### **Supplier Code of Conduct**

Our Supplier Code of Conduct, available on our website, lays out the principles and expectations for all suppliers conducting business with Rank. Suppliers must comply with all applicable laws, regulations, and standards in the countries where they operate, conduct all business activities with integrity, and avoid any form of corruption, bribery, or fraudulent practices.

This includes prohibition of child labour and forced labour, providing fair wages and benefits in line with local minimum wage standards, respecting workers' rights to freedom of association and right to collective bargaining, ensuring a workplace free of harassment, discrimination and abuse, complying with all applicable laws on working hours and overtime, and providing a safe and healthy working environment for all their workers.

We also expect suppliers to comply with all applicable data protection laws and regulations when processing personal data, avoid conflicts of interest, maintain a process for their employees to report concerns or illegal activities without fear of reprisal and ensure that their own third parties and subcontractors comply with Rank's Supplier Code of Conduct.

### **Protecting human rights**

Suppliers must comply with all internationally recognised human rights which, at a minimum, are understood as 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 Principle and Rights at Work in any part of its supply chain.

To make sure that human rights are not being contravened by any of our suppliers, there is oversight of practices for any businesses in high-risk industries, such as clothing manufacturers. Spot checks are carried out on factories, either by our own internal team or third-party auditors.

Taking a more proactive approach to modern slavery risk, this year we have partnered with Slave-Free Alliance. This organisation will be supporting Rank with their expertise by assessing our supply chain and reviewing our risk management framework. By commissioning this independent review of our procurement function, we can validate the strength of our existing controls and procedures.

### **Environmental expectations**

Reflecting our own sustainability commitments, we want to work with third parties that demonstrate environmental responsibility. Our Supplier Code of Conduct includes a requirement for suppliers to minimise their environmental impact by adopting sustainable practices.

This includes promoting waste reduction, and responsible use of energy and water. Suppliers must comply with environmental laws and regulations and strive for continuous improvement in their environmental performance with appropriate policies and systems in place.

Under Scope 3 emissions reporting, Rank needs to assess those emissions that are produced indirectly by our suppliers. We have included the expectation for suppliers to share environmental performance with Rank within our Supplier Code of Conduct. We encourage collaboration and engagement between ourselves and our suppliers to foster a responsible and sustainable supply chain.

### Monitoring compliance

Suppliers are expected to have systems in place to monitor and demonstrate their compliance with this Code. They should be open to audits or inspections by Rank or an appointed third party. We conduct spot checks for key suppliers. We have a contract management system that supports us through a contract's lifecycle, and we review contracts at different points dependent on the tier level of each supplier. It is very important to Rank to pay all suppliers on time, being part of our strong business partnering methodology we adopt into all of our commercial relationships. Our suppliers are critical to the continued success of Rank and as such, we support the Government's consultation on prompt payment practices, which ends in October 2025, on how to improve business-to-business payments, especially for small and medium enterprises. During 2024/25, Rank has continued to invest in transformation of its purchase-to-pay processes to improve the speed of which we pay our suppliers; Rank's average time to pay suppliers has improved from 24 days in June 2024, to 19 days in June 2025.

We partner with Alcumus, our dedicated verification provider, to conduct comprehensive due diligence and compliance checks on all contractors engaged across our venues, ensuring they possess the requisite documentation and certifications to deliver services in alignment with our operational and regulatory standards. This enhances our supply chain visibility and risk management by verifying critical aspects such as health and safety compliance, insurance coverage, environmental policies, financial stability, and adherence to ethical practices.

As a business in the betting and gaming industry, we must ensure that the third parties we work with are compliant with regulation and operate according to the same high standards of ethics that we set as a Group. Manufacturers of gambling equipment and software in the UK are required to have all their equipment and software tested and certified by independent test houses approved by the Gambling Commission. We must only source from those Gambling Commission-approved suppliers for our UK-based venues and online sites. If a company is not certified, we will not work with them.

Regular assessments of our gambling equipment and software suppliers are conducted, including benchmarking against other suppliers in the industry. Any identified instance of non-performance is treated seriously and we will support the supplier to improve the level of service they are providing us with. We carry out quarterly business reviews and all games are audited on an annual basis.

Though the legislation around manufacturers of gambling equipment and software is different in Spain, we have set the same high standards for the third parties we engage outside the UK. We seek to work with suppliers that can constantly increase the quality of their work, whilst maintaining zero tolerance for illegal and immoral conduct.

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## Data privacy and IT security

We employ well-established processes to safeguard our customers' privacy and ensure the security of their data. Our robust data and cybersecurity procedures and programmes are complemented by comprehensive employee training, fostering a culture of vigilance.

### **Data protection**

We have a dedicated Group Data Protection Officer ('DPO'), who works in close collaboration with the data and information security teams but is independent of the operational side of the business. This allows them to provide impartial guidance and advice and undertake compliance monitoring work. The DPO reports on a monthly basis to the Risk Committee and other management committees within the business, as required. A report is produced for the Audit Committee twice a year or more frequently, as required.

Our Spanish business aligns to the same framework; an external local data protection officer provides guidance and support with monthly reports provided to the Group DPO, and our Data Protection Committee in Spain meets every four to five months.

The Data Governance Council is composed of stakeholders and decision-makers from across the business to promote responsibility and accountability. We have also established an AI Governance Council, chaired by our Chief Information Officer, which is responsible for looking at key principles, including safety, security, and ethics, as we further implement and integrate AI tools and ways of working into the business.

We have a mature approach to data management and security; our priority is to ensure data is used in a fair and transparent manner and prevent breach or loss of data by understanding the risks presented by wrongful access, whether by our colleagues, customers, suppliers, or third parties.

This is managed via appropriate tooling and processes, with broad alignment to ISO 27001 and enhanced requirements of other regulators, including the Gambling Commission in the UK, the Information Commissioner's Office ('ICO'), and Payment Card Industry Data Security Standard ('PCI-DSS') regulations. Within Spain we are audited biannually under the Spanish Gambling Act 2011 (Ley 13/2011, de 27 de mayo, de regulación del juego).

We continually monitor the landscape for changes in regulation to ensure that Rank remains ahead of the curve and can meet all regulatory requirements. As a business with offices across the globe, we ensure we remain aware of the differing requirements for each location in which we operate. Our strategy is to work in accordance with a singular framework that sets the most stringent methodology, thereby streamlining compliance as far as possible whilst ensuring we are operating in line with industry best practice. This was demonstrated by Rank being one of the first companies to certify against the new PCI-DSS standard version 4 in Europe, twelve months before it was fully enforced.

The Data Protection Compliance Monitoring Programme, managed by the Group DPO, embeds the ICO accountability framework and identifies areas for improvement or increased monitoring or where different jurisdictional requirements apply.

Our Data Protection Policy provides direction on data handling matters, including user rights, data retention, data sharing, and security. The policy is reviewed regularly to ensure it aligns with changes in regulation, and all employees must adhere to these stated procedures. Training on the policy is provided to our colleagues on an annual basis. In Spain, we review our Data Protection Policy annually; all new employees must read and sign the policy to demonstrate acknowledgement and their responsibilities regarding data protection.

Our data breach reporting process encourages colleagues to report near misses in order to reduce the number of actual incidents, as people are more aware of the risks, and improvements to processes can be identified before a breach occurs. We use the reports submitted to identify trends and areas where there is a gap in knowledge, and issue specific guidance to address the gap.

### **Employee awareness**

A critical factor in maintaining data security is ensuring that employees are aware of both the related risks and the proper data handling procedures. To maintain the prevalence of data protection in colleagues' minds, we take a number of actions in our UK businesses.

There is compulsory information security induction and completion of annual data protection and information security refresher training. Bespoke training on data protection is provided to colleagues responsible for product development and for high-risk roles. Awareness campaigns are tailored to the location of colleagues, such as office-based posters reminding our office teams how to securely dispose of printed materials and reminders about the risk of phishing attacks.

Site visits are carried out by the information security teams as appropriate, during which we train employees to treat security at work like they do at home to improve on their personal cyber hygiene. All team members are required to engage with security forums and attend security expos and maintain their own development and accreditations.

Best practice newsletters are sent out every month across the Group and translated into Catalan and Spanish to bolster knowledge and keep employees abreast of cyber trends. Data protection training is included in the welcome pack for all new employees in Spain.

### IT and data security

We maintain clear accountability of IT and data security. The Board of Directors has ultimate responsibility for data security, with clear reporting lines and delegated responsibility through the Chief Executive to the Chief Information Officer, Chief Data Officer, and Director of IT Security. Their respective teams have expertise in data governance and architecture, data security, vulnerability management, Security Operations Centre ('SOC'), cybersecurity, security governance, ethical hacking, and development, security and operations ('DevSecOps').

The protection measures we employ are dependent upon the level and type of security required. These include, but are not limited to, password management (complexity and frequency of change), multifactor authentication, firewalls, encryption, rolebased access controls, end point protection, intrusion detection/prevention, and employee education.

These measures are aligned with industry best practice and covered within the policies that are reviewed and updated annually to ensure compliance.

A 24/7 365 managed service, known internally as the SOC, is in place, monitoring security events internally and externally across the Group. Our dedicated SOC team reports any activity of concern directly into our internal Information Security Team and relevant support team ready for further investigation and next actions, to ensure our security posture remains intact.

To ensure the effectiveness of our systems, we contribute to regular internal and external audits and assessments. Accredited vulnerability audits and scans are carried out on a monthly basis, audits for the Gambling Commission and our PCI-DSS compliance are carried out on an annual basis and internal audits are carried out on a project and risk basis. To mature our responses on security events, we complete quarterly cyber simulations to test both our security tools and the support teams.

The Gambling Commission requires our UK digital business to undertake and pass an annual security audit. The framework is aligned to the ISO 27001:2013 standard, totalling over 60 security controls being audited, and multiple stakeholders across the business being involved in the process, providing evidence that we meet the controls specified in the policies.

Number of data breaches

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### **Spotlight:**

Responsibly unlocking Al's potential

Our aim is to provide exciting and entertaining experiences to our customers, and we recognise the transformative potential of AI and how it can elevate our offering. Nevertheless, we must also acknowledge the inherent risks associated with AI.

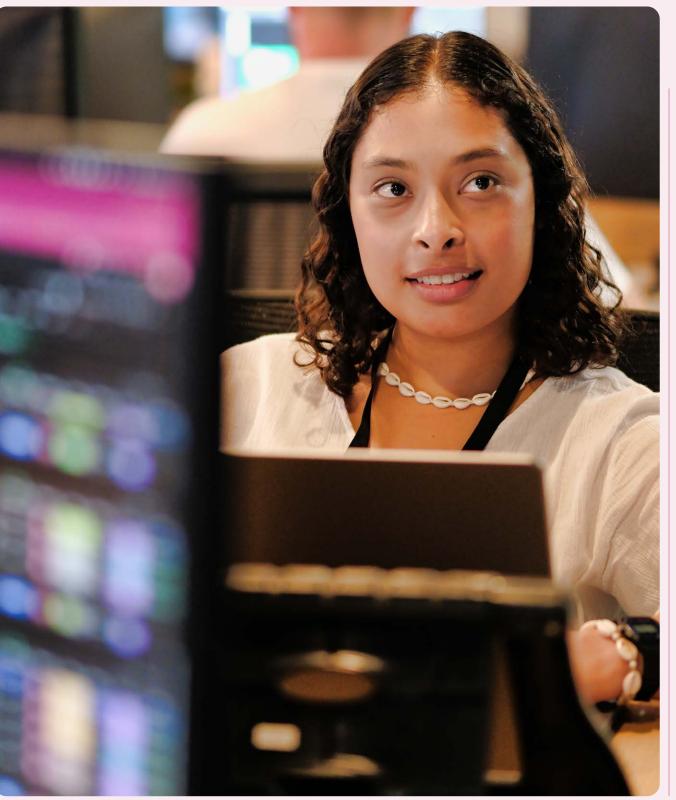
We have therefore adopted a measured approach in integrating AI capabilities into our business, prioritising ethical considerations, data privacy, and responsible implementation.

The AI Governance Council is chaired by the Chief Information Officer ('CIO'), and includes procurement and our Data Protection Officer. This council is responsible for ensuring that all AI initiatives adhere to key principles of safety, security, ethical conduct, responsibility, and accountability, aligning with our values and strategic objectives.

Our AI Steering Committee, meanwhile, is chaired by our Transformation Director and brings together our leadership including the CIO, Chief Operating Officer, Chief Data Officer, and Chief Product Officer. The Committee is focusing on AI from an innovation perspective and assessing use cases across the business.

There are a whole host of opportunities for implementing AI to save time and automate manual processes, but there are also opportunities to improve accessibility and inclusivity. AI capabilities for instant translation can help us more quickly communicate with our colleagues in different locations and international customers that visit our venues.

We know that the higher the quality of the data we are inputting, the more effective and efficient AI will be in delivering what we need. Our Central Engagement Platform ('CEP') is key in this respect; it draws on our numerous digital and venues systems, amassing our data into a single trusted source of the truth. By using the CEP when deploying new AI technology, we can be confident that it is using quality information.



## Utilising AI to improve the colleague and customer experience

As the use of AI necessitates a comprehensive risk management framework, a decision was made to restrict the general use of such tools until a robust protocol could be established. An exception was made for specific use cases where clear parameters could be defined and rigorously monitored. One such application is the introduction of an AI co-pilot within the customer service centre.

This initiative involved a collaborative development process, led by a dedicated AI Lead, working in close partnership with the customer service team. A thorough testing phase was conducted to refine the AI tool and ensure its accuracy and usability.

The AI co-pilot assists customer service representatives by processing queries from the live chat function and generating suggested responses. These responses are then reviewed by the representative, who can choose to send the AI-generated response, edit it, or compose their own response. The customer service team has reported a high level of accuracy in the AI-generated responses and also highlighted the benefit of AI in creating a universal language in our customer interactions. Furthermore, AI is being utilised to automate the creation of customer interaction summaries, a previously manual and time-consuming task.

The implementation of the AI co-pilot has yielded tangible benefits, freeing up customer service representatives to focus on more complex and nuanced customer issues. The AI Lead continues to collaborate with the customer service team, monitoring the tool's performance, gathering feedback, and developing new functionalities to automate additional manual tasks. This iterative approach ensures that the AI co-pilot remains a valuable and relevant tool for the customer service team.

By prioritising risk management, establishing a robust governance framework, and focusing on targeted applications, Rank is harnessing the power of AI to enhance its operations while mitigating potential risks. We will continue to refine our approach to using AI and look forward to implementing this new technology in other parts of our business.

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# Customers

**Aim:** Deliver exciting and entertaining experiences in safe environments

How we measure progress:

Customer net promoter score ('NPS')\*



Customer feedback scores on safer gambling\*

**84%** Below target of 85%



**Employee NPS on safer gambling** 



UK digital customers using safer gambling tools\*\*

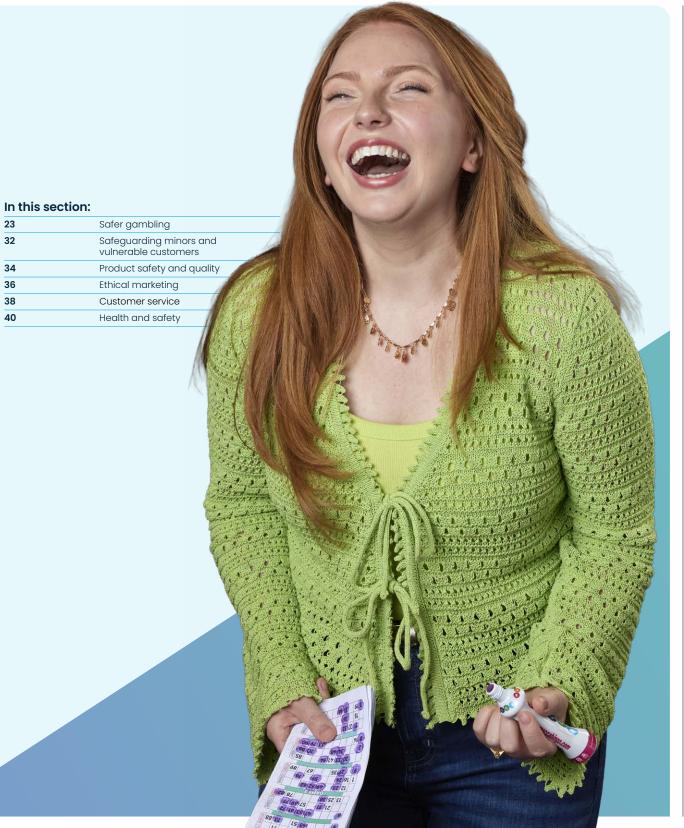


### Our responsible approach to operating is reflected throughout our Customers focus area.

We are committed to delivering excitement and entertainment to our customers, whilst also providing a safe environment in which to enjoy those experiences. Our safer gambling ethos runs through everything we do, including how we market our products in an ethical manner, and the steps we take to safeguarding vulnerable customers. Protecting our customers also includes their physical safety, and we have robust health and safety processes in our venues. We also make sure that we are always listening and responding to our customers, and have continued to elevate our customer service through investment and training. While we have a clear understanding of the material issues we consider from a customer perspective, our double materiality assessment identified the specific impacts, risks, and opportunities ('IRO') which are currently most material from a financial and an impact perspective.

'Delivering exciting and entertaining experiences for our customers' and 'high customer satisfaction results in higher NPS and positive reputational impact' are unsurprisingly key for our customers and for driving the success of the business. Our customer service section talks to the efforts we continue to make to elevate our offering, while our Annual Report contains further details on the products and services we are delivering across our brands. Surpassing our NPS target this year demonstrates the success in our approach.

Safer gambling is naturally a critical focus for our business, and the risk around 'failure to adequately protect customers from gambling-related harm' was reinforced through the double materiality assessment. The Safer Gambling section details our approach of continuous improvement in identifying at-risk play, from investing in new technology to making sure that it is at the forefront of colleagues' minds through awareness and training initiatives. While we retained the same customer feedback score on safer gambling, we exceeded the target for our employee NPS on safer gambling.

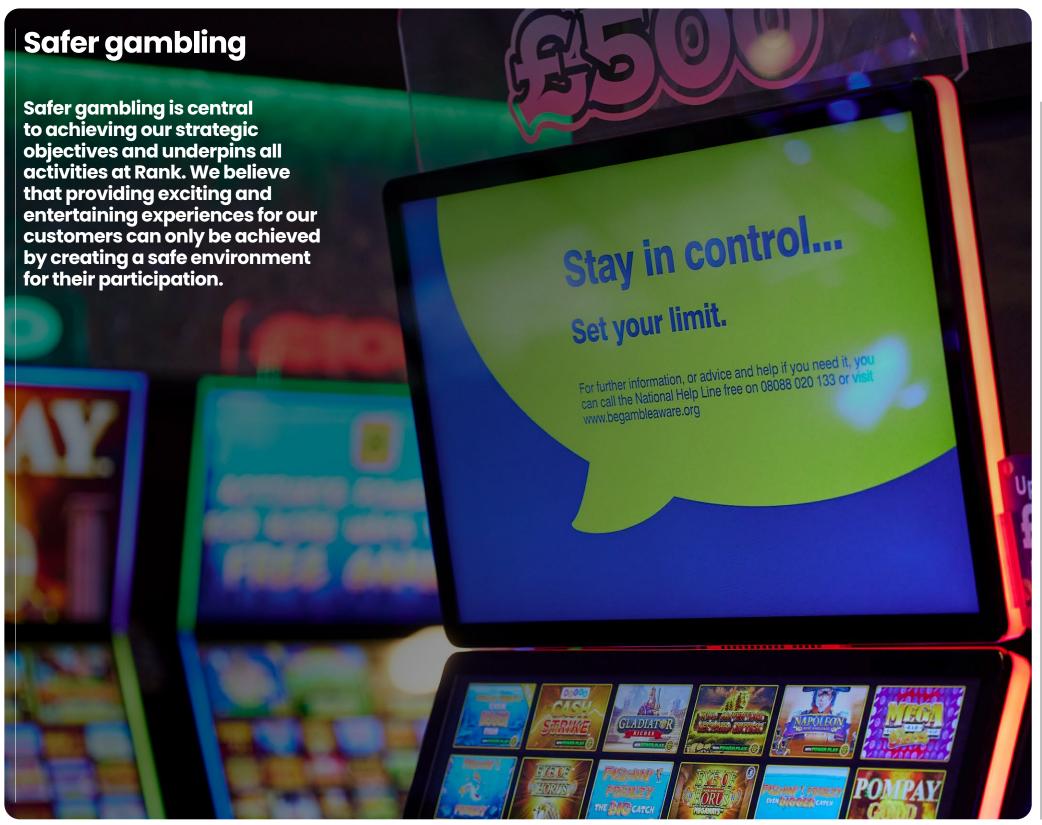


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**Customers** 

<sup>\*</sup> An average for last three months of the year and this Group score is a

<sup>\*\*</sup> This is the percentage of total active customers that have used safer gambling tools during the year



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We have safer gambling policies in each jurisdiction in which we operate, tailored to the regulatory environment. Our safer gambling strategy is focused on providing the right support and safeguarding, while also maintaining a seamless experience for our customers. Foremost, we are committed to promoting awareness of safer gambling practices amongst both our customers and colleagues through consistent messaging in every venue, across every platform, and in all our communications.

We provide our customers with a range of information and safer gambling tools that they can utilise to control and enhance their awareness of their play. These tools are designed to empower customers to make informed decisions and manage their gambling behaviour effectively.

Despite equipping our customers with the knowledge and measures to have a safe experience, we recognise that a small proportion of individuals may exhibit at-risk behaviour. It is therefore critical that we continuously monitor for signs of at-risk play and intervene as appropriate.

We have a continuous improvement approach, constantly evolving our safer gambling processes. This includes utilising new technologies and upskilling our colleagues to ensure they are equipped to identify and support customers who may be experiencing gambling-related harm.

Maintaining compliance with all relevant regulations in every jurisdiction in which we operate is paramount. Furthermore, we proactively seek opportunities to go beyond regulatory requirements where we identify opportunities to provide additional safeguards for our customers. We also work diligently to anticipate regulatory changes and prepare to meet new requirements. This proactive approach ensures that we can maintain a smooth customer experience while adapting to evolving legislative requirements.

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### Safer gambling messaging

A core tenet of our strategy is promoting awareness of safer gambling. To this end, we have prioritised the integration of safer gambling messaging across all communication channels, ensuring consistent visibility for both our customers and our colleagues. This comprehensive approach serves to reinforce awareness of responsible gambling, providing readily accessible support resources while maintaining a seamless customer experience. We follow industry best practice on safer gambling messaging and comply with GamCare's Industry Code for the Display of Safer Gambling Information on websites and apps and, following its introduction last year, we also comply with the Code for the visibility of safer gambling in UK land-based venues. Our customers' assessment of our approach to safer gambling is tracked across our digital and land-based brands. This year the customer feedback score on safer gambling was 84%.

#### What's new?

In Grosvenor, we have introduced QR codes in venues for customers to scan and easily access information, such as the rules of the games. This is also another touchpoint for safer gambling messaging. In Enracha, we have increased the presence of safer gambling messaging in venues, with posters on each door in the bathrooms and making more leaflets available.

We have commenced a pilot exercise to improve safer gambling awareness for UK digital customers through the use of display messaging to customers while logged in and active. This type of messaging can direct customers to safer gambling information and clearly marks routes to safer gambling tools. The pilot will include an assessment of the effectiveness of displaying real-time messaging to customers.

# Going beyond regulation

Our pilot exercise to improve safer gambling awareness for online customers goes beyond what is required of the business by the Gambling Commission. Through this enhanced messaging, we seek to understand the effectiveness of early signposting to customers.

### Safer gambling messaging is present throughout the customer journey, at multiple different touchpoints: **Introductory safer** Whether registering to play online or in venue, every new customer in the UK or in our Spanish digital business receives a safer gambling message that includes information about the tools available to all players. At our Enracha venues, gambling message customers must show their ID on entry and can be provided with more information on safer gambling if they require it this is in line with regulation in Spain. Website links We make safer gambling information easily accessible with links on every page of our websites to our dedicated safer gambling pages or standalone website (see below). There are resources and links to gambling charities on the dedicated safer gambling page of the Enracha website and for Rank's Spanish digital business. **Dedicated safer** Our standalone, dedicated safer gambling website in the UK, Keep It Fun, is a hub for advice and information on safer gambling tools available. Keep It Fun messaging appears on all our communications as standard and is signposted on all gambling website our UK diaital sites. Tailored messages Targeted interactions are driven by the proprietary Hawkeye model, with tailored emails sent to UK digital customers advising of Safer Gambling tools and resources. For Rank's Spanish digital business, customer communications and marketing materials include links to our safer gambling page and the national self-exclusion scheme. **Leaflets and posters** There are safer gambling leaflets at various locations throughout our venues. In compliance with GamCare's Industry Code for the Display of Safer Gambling Information (Gambling Venues), we have prominent safer gambling messaging in all UK land-based venues, including printed resources available for customers to read or take home, and digital touchpoints in our newly refurbished venues. In our Enracha venues, safer gambling messaging can be found on posters in every toilet and on leaflets available at reception, providing information on where players can seek help, and we also have a small 'vignette' on every slot machine concerning responsible gambling. We ensure that leaflets and posters are displayed and available in colleague areas of the venues, to remind colleagues of our commitment to safer gambling and provide easy access to materials and information. **Enhanced CRM activity** There is enhanced safer gambling activity to support the annual Safer Gambling Week initiative in November. As well as a social media programme highlighting Safer Gambling Week, enhanced internal communications, and promotion of the week on our corporate website, we had additional materials and messaging in the venues and on our brand websites. Gaming machine signs There are safer gambling notifications on all machines across the Mecca and Grosvenor estates and there is appropriate signage in the gaming machine areas. In our Enracha venues, safer gambling messaging can be found on all gaming machines.

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### Safer gambling tools

Our safer gambling tools are designed to support customers to control their play. Clear and prominent signposting ensures that these resources are easily discoverable should customers require them.

To ensure their continued efficacy, we regularly review our existing measures, introducing new tools or updates based on player behaviour, while maintaining compliance with industry requirements.

Use of these tools is an important measure of safer gambling awareness amongst our customers. The rate of use amongst our UK digital customers is a KPI and this year 30% percent of customers employed safer gambling tools.



### Deposit and loss limits



In the UK, we encourage our digital customers to set net deposit or financial limits, which can be set for a 24-hour, sevenday or 30-day period. Customers must wait 24 hours before a deposit limit can be increased.

When a customer registers with our Spanish digital business, default daily, weekly, and monthly deposit limits are set on all games. Customers can immediately set that limit at a lower level if they prefer, and must apply to the business to increase the limit.

In our UK venues, customers can apply machine time and loss limits at gaming and electronic roulette machines in our Grosvenor venues and on B3 gaming machines within the Mecca estate. The gaming machines present a default limit that customers can choose to change or remove before playing; throughout their play, a message will pop up at set intervals to remind the player how much they have spent.

In our Mecca venues, customers can set deposit alerts on Mecca Max electronic touch screen tablets. When a customer reaches a self-set machine spend limit, they are alerted accordingly. A notification is sent to a dedicated mobile handset carried by the venue's manager, who can then assess and determine whether a formal interaction with the customer is necessary.

### **Time limits**



UK digital customers can set up Reality Check alerts on their account; these are pop-up alerts which remind the customer they have been logged into their account for a specified period of time. Customers can block access to their account, for anything from one day to up to six weeks, by means of our Take a Break tool.

In Spain, digital customers must set themselves time limits on play on all games with the exception of sports betting.

In our UK venues, as well as deposit/loss limits, customers can set time limits on the same gaming machines, with reminders popping up accordingly. Mecca Max tablets also offer customers the opportunity to take a break from playing, but not to self-exclude from Mecca completely. This is a useful tool to enable a customer to further control their spend while also continuing to enjoy the social aspect of the bingo club.

### Self-assessment



We provide links to GamCare's self-assessment tool from our UK dedicated safer gambling website. Customers can work through the questions on the assessment and, through their answers, evaluate whether they suffer from any at-risk behaviours.

We issue online and offline activity messages and monthly reports to our international digital customers to support awareness of the level and nature of their play. During their play session the customers will receive, at least every 60 minutes, informative messages with transparent information about their session behaviour and spending. Additionally, a monthly report with an activity summary will be provided.

Continues on the next page



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# Self-exclusion (Rank process)



Taking an enforced break from gambling can be the preferred option for customers who are concerned that they have a problem with gambling and feel that setting limits is not sufficient. All our channels offer the option to self-exclude. To support a customer that has self-excluded, their status will be updated automatically on our marketing system, which will suppress all communications to that customer.

The process of returning to gamble following a self-exclusion is also arduous by design. In the UK, a customer will have to apply in writing or in person requesting that they are reinstated. For venues, the local venue management will interview the customer and assess whether they recommend reinstatement. Rank operates an independent safer gambling team which assesses each reinstatement request and takes a holistic view of the customer's lifetime history with Rank. They also, in the case of customers who use our venues, take into account the views of local management. Only then do they determine whether reinstatement is the appropriate decision for both the customer and Rank.

For our Spanish digital business, our operator self-exclusion scheme allows customers to exclude from playing for any duration from one day onwards. If a customer self-excludes for a period of less than six months, the self-exclusion ends automatically at the pre-selected time and cannot be lifted early. If the self-exclusion is for six months or more, it can be lifted early if the customer requests to, however the request must first be reviewed by the Safer Gambling team.

# Self-exclusion (national schemes)



Customers are able to self-exclude from all regulated operators by means of national schemes in Great Britain; GAMSTOP for digital, SENSE for land-based casinos, and BISES for land-based bingo. Customers may sign up online or, in the case of SENSE and BISES, in venue. Rank runs regular checks against the databases held by the providers of these national schemes to ensure that it implements self-exclusions that have been put in place this way. Our Keep It Fun website in the UK includes information about how to self-exclude and details of the national self-exclusion schemes.

Where a customer has removed themselves via SENSE and BISES, we have a robust reinstatement process designed to protect them. Rank's independent safer gambling team is notified and performs a holistic review of the customer's lifetime history with Rank. In Grosvenor, approval is required from the Grosvenor operational team; local venue management then hold a mandatory safer gambling and affordability conversation with the customer and only permit the customer to enter if they are satisfied that they are in control of their gambling; and for reinstated customers with more than one previous self-exclusion, their play post-reinstatement is monitored for the next 90 days. In Mecca, the Mecca operational team must approve reinstatement if the customer's history includes more than two previous self-exclusion periods.

In Spain, customers can self-exclude from playing nationwide through RGIAJ (regulator's ban), managed via the national regulator's platform. For land-based gambling, the registration system can vary from one region to another. Customers can choose any exclusion period. Once the ban is lifted, accounts remain suspended until reviewed by the Safer Gambling team upon request. The RGIAJ status is automatically synced via an API with the regulator's database, so we always have real-time visibility of a customer's status. Once a customer has self-excluded, they cannot enter our venues, are removed from the customer database, and will not receive any communications from Enracha or our Spanish digital brands.

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### Detecting at-risk customers

We are proud to provide exciting and entertaining experiences to our customers both online and in our venues. We recognise the importance of proactive measures to mitigate potential gambling-related harm, and by educating customers about safer gambling practices and providing them with the tools to play responsibly we minimise this risk.

Nevertheless, a very small proportion of customers can exhibit behaviours that indicate they are at risk. It is therefore critical that we implement processes to identify these individuals promptly and provide them with the appropriate support. We have established clear methodologies for detecting instances of at-risk play and determining the most effective intervention strategies, while ensuring a seamless and frictionless experience for all customers. The specific approach employed is tailored to the unique characteristics of each business unit and jurisdiction. We leverage data models, utilise play monitoring systems, and promote employee awareness of problem gambling behaviours.

### What's new?

GamProtect commenced in 2023 as a pilot initiative and collaborative project involving the BGC, the ICO, the Gambling Commission ('GC'), and gambling operators. The project moved from the pilot stage to the implementation stage in 2024, and Rank's UK digital business is currently in the preparation stage for joining the full scheme.

Under the scheme, participating operators will identify a player as being at risk if the customer themself states they meet one of five triggers: that they have a gambling addiction, they are seeking support or treatment for addiction, they might harm themselves and/or others, they should not be gambling due to a health condition, or they want to stop gambling due to gambling addiction. Once a trigger is identified, an operator will share the customer's personally identifiable information and the reason for the flag with GamProtect, allowing other operators to check if the same customer has an account with them and to close it if necessary.

We have taken steps to improve oversight of customers' play on the gaming machines in Mecca venues this year. We have removed reliance on manual recording of slots play through the delivery of real-time, data-led customer monitoring within our arcades. Through the introduction of behaviour reporting, we are also enabling enhanced player evaluation. Finally, by centralising the oversight of slots play, we are able to strengthen the support given to the Mecca venues in detecting at-risk behaviours.

In May 2024, the Gambling Commission announced new requirements for online operators to conduct a financial vulnerability check when a customer loses £500 in a rolling 30 days (effective 31 August 2024 and reducing to £150 net deposits in a rolling 30-day period on 28 February 2025). The intention is that the check is carried out using publicly available information, checking for red flags such as bankruptcy orders and court judgments.

The ultimate objective would be to identify financial vulnerability and risk to help operators prevent serious cases where customers are able to spend large amounts in short spaces of time without any checks or support.

A pilot commenced in August 2024 with the largest operators and credit reference agencies ('CRAs') to test how financial risk assessments could be introduced in a way that supports high-spending customers in financial difficulties, while also supporting a frictionless customer journey for the majority of customers. The pilot will help inform how the data could most effectively be presented to operators to provide a good understanding of a customer's individual financial risk.

The first two pilot stages consist of retrospective analysis of customer data by CRAs, the results of these stages are currently being evaluated; the scope of stage three has not yet been determined. In line with new requirement from the UK Government, we completed the technology development required to restrict maximum staking for online slots to  $\pounds 5$ , with a  $\pounds 2$  maximum for those aged under 25, for our UK digital business in line with the respective April 2025 and May 2025 implementation deadlines.

For the first time since it was launched in 2022, we engaged a third party to conduct an independent assessment of our UK digital business's Markers of Harm model. This included reviewing procedure documents, assessing compliance of processes, reviewing customer files, and on-site attendance at our Sheffield office to gain a clear understanding of our processes working in practice.

A final report was produced with feedback, recommendations, and insights on best practices from other operators for consideration. A summary of the recommendations was presented to the Compliance & Responsible Gambling Committee in May 2025. Progress updates will be monitored through to completion at the biweekly Player Protection SteerComeetings and monthly progress updates will be provided to the Compliance & Responsible Gambling Committee. This independent evaluation will be valuable in enabling us to enhance our existing processes and strengthen the effectiveness of our framework.

At the inaugural EGR Europe Awards in March 2025, we were delighted to win the European Safer Gambling Initiative Award for our development and use of Hawkeye, our in-house live monitoring player protection suite of tools.

These awards recognise and reward operators, affiliates, and service providers leading the industry in innovation, sustainability, customer experience, and product development across the continent. This win reflects the dedication of our Player Protection team, as well as the many individuals and teams behind Hawkeye, who continually enhance the platform to keep up with changing regulations and player behaviours.





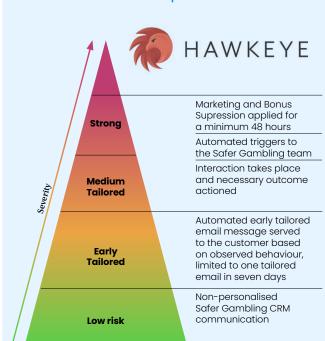
### Monitoring play

We employ a number of different tools to monitor play in venues and online. By tracking behaviours that could indicate at-risk play, we are able to identify whether an intervention is required. Our Central Engagement Platform then draws on information from all the UK digital and land-based brands, creating a centralised source of data and a single view of our customers.

The experience of and training provided to our colleagues also enables us to monitor play in venues – this is covered in more detail in the following section (pages 30 to 31).

# Going beyond regulation

Our Hawkeye system enables live monitoring of all UK digital play 24 hours a day, every day of the year. The system was built fully in-house, enabling us to tailor it to suit our needs and processes.



# Digital play monitoring

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We use Hawkeye, our 24/7 live monitoring system, to monitor digital play in real time. The system tracks numerous different behaviours, including stakes, failed deposits, session length, velocity of play, and late-night play. Our Markers of Harm model is an overlay in the Hawkeye system, scoring customers based on demographic, transactional, and behavioural data. If a customer's score exceeds the predetermined threshold, this is a trigger for a safer gambling interaction.

By tracking these behaviours, we are able to build a picture of a customer's behaviour over time and track trends in their play. For example, if a customer were to repeatedly exceed the Markers of Harm trigger score, additional action would be taken to help protect that customer from harm. Alternatively, a customer demonstrating behaviours that do not exceed the threshold on Hawkeye for an interaction but fall in the range directly below that threshold could still be at risk; they will receive an early tailored interaction email, which explains the specific behaviour they demonstrated online and offers help and advice on how to manage their gambling.

# Grosvenor casino management system



NEON, our casino management system, assists our teams in detecting at-risk play by tracking all players that are entering Grosvenor venues. Prompts are issued on the system when a customer spends defined trigger amounts at the tables and if a customer visits more than one casino in the same day and spends above Grosvenor's thresholds.

### Grosvenor venues app



The Risk app provides greater connectivity between the assessments of the risk matrix and the behaviour of customers in venue by providing real-time colleague notifications of customers entering a venue. We can therefore more quickly identify these individuals and provide them with the support they require.

The Risk app automatically updates NEON with the outcome of any review or interaction with a customer that has taken place. From the daily report generated by the Risk app, we can identify customers that have demonstrated at-risk behaviour under pre-defined circumstances (these relate to risk, affordability, and spend). This automatically requires the venue team to open a conversation with the customer and to do so within five visits to the venue by that individual. Furthermore, the Risk app also indicates on each customer's profile where an action, such an interaction, is outstanding.

# Mecca venues electronic bingo tablets



In the Mecca venues, we can track customer spend on the Max electronic bingo tablets.

We monitor customer activity against set financial thresholds through Mecca Max and take action when required.

# Mecca machine management system



Playsafe, a machine management system, enables Category B3 machine play in our Mecca venues to be monitored in real time.

Certain play behaviours will trigger alerts on the system, prompting the managers in the venue to review the behaviour and confirm what action (if required) should or has been taken, by utilising their knowledge of the customer.

# Central Engagement Platform



The Central Engagement Platform ('CEP') has enabled us to create a single view of our customers. This provides a richer understanding of a customer's engagement with our brands across our channels, which is fundamental in ensuring we correctly communicate to customers with the right marketing and service messages at the right time with accurate information. Critically, this supports our safer gambling objectives, as we are more accurately able to predict and identify at-risk customers through triggers and statistical models. We continue to build the capabilities of the CEP by improving our data quality, enhancing performance as we decommission old systems and transfer their functions to CEP, and increasing the amount of process automation and efficiencies. This is enabling us to become a more proactive, dynamic, and responsive business.

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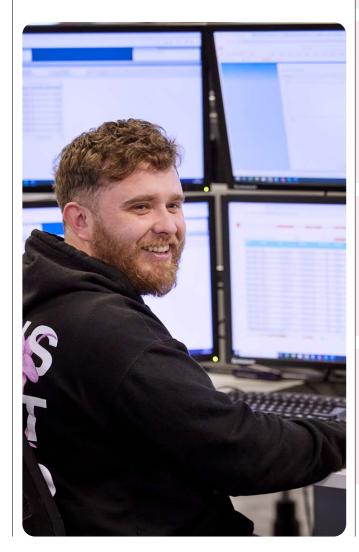
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### Data models

Data modelling enables the identification of customers who may be vulnerable to problem gambling by leveraging relevant behavioural and transactional information. These models feed into our different methods of monitoring play – whether that is the systems we have in place (as detailed above), or the in-person observations of our staff in venues (detailed in the following section) – and help us to make informed decisions about how to support customers.



## Markers of Harm model (UK digital)



The Markers of Harm model enables us to identify those customers for whom an early intervention may be appropriate, and to approach intervention in a more tailored and personalised way. The model is run continuously on all customers and it uses demographic, transactional, and behavioural data, and known markers of harm to assess customers. The score a customer receives based on this data evaluation indicates the level of risk attributed to that individual. This determines the type of interaction they will need to receive. This can range from an email with safer gambling information, a direct call, or blocking the account altogether.

Customer profiles are constantly updated based on the information we glean from the model monitoring and elsewhere, and they are reviewed to inform the appropriate action to safeguard the customer. Anyone scoring over a particular level is prevented from receiving CRM activity and has a reduced visibility of on-site marketing and promotional assets.

We are continuously reviewing the effectiveness of the Markers of Harm model and making improvements to ensure that it is best placed to identify risks.

## Affordability assessments (UK digital)



We never want our customers to spend more than they can afford. For our UK digital business, each new customer attempting to deposit is checked against their credit profile. The result provides us with an early indication of any affordability red flags. We use the results from this check to inform limits that may be applied to customer accounts at an early stage in their journey.

In addition, we employ an affordability model in our UK digital business, which assesses customers based upon their level of play relative to their likely level of discretionary expenditure. Income is estimated based on national distribution of income by age band, and at a postcode level. We are proactive in applying limits to customer accounts if we have a reason to suspect that a customer may be playing to a level that is more than they can afford or if they are in an age demographic that is considered to be at more risk of financial harm, such as under-25s. In Spain, we are currently exploring open-source methods to understand potential risk indicators.

# Risk matrix (Grosvenor venues)



For customers playing in our Grosvenor venues, we have a risk model to identify potential at-risk play and to assess a customer's level of affordability. We assess customer spend in relation to their income (known or estimated), their number of visits and corresponding expenditure, their patterns of play, and how much they have spent in the last 90 days versus the 90 days prior.

A report from the model is published daily to each venue. Trained, in-venue colleagues have the ability to observe customer behaviour first-hand and draw on their own knowledge of customers from face-to-face interactions and day-to-day provision of customer services. They use their insight and personal knowledge of customers, together with the data provided by the risk model report in Grosvenor, in order to determine if any further interaction is required.

# Risk algorithm (Spanish digital)



In Spain, for our digital businesses, the requirements for safer gambling tools are regulator led and dictated, with each new online account having a default deposit limit and a clear application process if a customer wishes to increase it. If a customer applies for an increase in deposit limit, but their trajectory of spend suggests they would be at risk, they are denied the increase and assigned a 'cool-off period' before they can reapply.

In Spain, risk is determined against an operator's internal criteria; our risk algorithm is based on suspicion and evidence of risk and there are several factors that will inform a customer's score. This includes variables such as self-exclusion, time passed since national ban, and deposit velocity. Our Safer Gambling Protocol includes our risk algorithm, and we have a safer gambling platform and reporting mechanisms within our Spanish digital business.

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### Culture of responsibility

Instrumental to the effectiveness of our safer gambling approach is our colleagues. Through regular training and by fostering a culture of awareness and responsibility, we make sure that safer gambling is at the forefront of everyone's minds and that our colleagues understand at-risk behaviours and provide or signpost support as needed.

### **Employee training**

To ensure our colleagues possess the requisite skills and understanding to identify potentially harmful behaviours, training is crucial. All UK-based employees are required to undertake regular mandatory safer gambling training, with progress meticulously tracked via our online platform. Supplementary training is provided as necessary or tailored to the specific demands of individual roles.

We have previously partnered with the charity GamCare to deliver two tiers of customised training across Mecca, Grosvenor, and the UK digital business. The Gold Level training is a one-day intermediate level course, focused on spotting markers of harm and initiating first interactions, valuable for frontline, customer-facing team members, such as bingo chat hosts, duty managers, and cashiers. The Platinum Level is delivered to colleagues responsible for escalated safer gambling conversations and educates them on the use of motivational interviewing techniques, which involves helping customers at risk of harm to recognise that they may need to change their gambling behaviour, before supporting them to understand what that positive change may look like.

Going forwards, GamCare will no longer be providing this training in partnership with operators. We are therefore exploring other options for third-party training. Our internal training programmes will continue as normal.

Within our Spanish venues business, we have implemented a safer gambling training programme to enhance employee awareness. This programme was developed in partnership with Better Change, an external organisation specialising in this area. The training is specifically tailored to the operating context of our business and is delivered via an accessible online platform.

Recognising that some employees may lack computer access at home, our HR team made sure to provide dedicated computer access points within our venues. Mandatory completion of this training was required for all colleagues within the Spanish venues business during the reporting year.

The training curriculum incorporates short video modules, detailed explanations of indicators associated with problem gambling behaviours, guidance on effective questioning techniques, and strategies for adapting employee behaviour when interacting with potentially at-risk customers. Furthermore, a clearly defined checklist is provided to ensure consistent and appropriate action is taken upon the identification of a customer exhibiting signs of gambling-related harm.

For our Spanish venues, we also have a training programme which was developed by a gambling addiction charity, Gordon Moody, available through our online learning platform, Campus. The purpose of the training is to improve awareness of problem gambling and identifying customers that may be at risk.

In our Spanish digital business, we have safer gambling training every year for all members of the team. We also provide specific training for customer-oriented colleagues annually. Safer gambling training is included in the onboarding for our customer services and payments teams as well.

Percentage workforce completion of safer gambling training

82%

# Going beyond regulation

In Spain, safer gambling training for colleagues is not a regulatory requirement. However, we provide this training as we feel it is beneficial for our colleagues to be informed about safer gambling. This also means the business is well placed should regulation be introduced that requires such training.

### **Employee interactions**

When initiating a safer gambling interaction in a venue, our colleagues' insights and personal knowledge of customers are invaluable. Upon identifying a customer for interaction, the team will react in a timely manner to ensure that a conversation is held with the customer at the earliest possible opportunity. Team members will check on the customer's wellbeing and query their comfort with the level of gambling at which they are playing.

All conversations with casino customers that lead to an affordability assessment are systematically tracked, with the outcomes of each assessment thoroughly documented. In cases where concerns arise regarding a customer's gambling behaviour and further engagement is deemed necessary, we retain the authority as an operator to suspend their account or impose limits until the conversation has taken place.

If a customer's activity triggers the need for a review (across Mecca, Grosvenor, or UK digital), previous interactions are carefully examined, including the timing of the interaction and any subsequent changes in the customer's gambling behaviour or patterns.

To uphold standards of responsible gambling, first-line operational teams conduct regular quality assurance checks on customer interactions. Additionally, from a second-line monitoring perspective, the compliance team performs monthly customer file sampling exercises. These sampling activities include an evaluation of the impact of employee interactions identified during the reviews, ensuring continuous improvement and adherence to safer gambling practices.

Employee interactions with customers concerning safer gambling are also reflected in customer reviews, providing valuable insights into the effectiveness of these engagements.

Upon identification of at-risk behaviours for a Spanish digital customer, our safer gambling team will send a direct message to the customer. This communication will explain the identification of the at-risk customer, information regarding activity and spendings, behaviour changes (if any), and game controls recommendation, including the self-exclusion and the national ban. Furthermore, for those customers that exhibit at-risk play, we do not allow credit cards to be used and payment methods must be verified; players must accept these conditions in order for the account to remain open.

We assess colleague sentiment on the Group's approach to safer gambling twice a year and the eNPS score on safer gambling is one of the four ESG KPIs linked to executive remuneration. Our latest eNPS on safer gambling was 72, exceeding both last year's score and our target for 2024/25.

# Going beyond regulation

In Spain, safer gambling regulation does not require gambling venues to proactively intervene with customers. Nevertheless, we have a comprehensive protocol outlining how to support customers who may be exhibiting behaviours indicative of risk.

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### Case study:

General Manager (Grosvenor Manchester Bury New Road) Emily Stratton talks about fostering a culture of responsibility at her venue

We recognise that our customers get huge enjoyment from playing in our casino. It's a fun pastime in an exciting environment and that's why our customers return to us.

Most of our customers play well within their means and have huge fun in doing so, however we recognise that there is a small minority who could get into difficulty by spending more than they can really afford. We take a responsible approach and have worked hard to integrate safer gambling into everything we do.

My role as General Manager involves ensuring that we are upholding this commitment in every aspect of our operations. I regularly review the venue's activity, specifically looking at who lost money. I delve into individual customer cases, asking myself: "Am I happy with the quality of the conversations we had? Were there enough conversations? Is there feedback for my managers on how we managed these situations?" My managers understand how important safer gambling is to our way of working.

We actively discuss customers who are losing, and customers who are winning too, and whether we are satisfied with the level of conversations and interactions we're having with them. It's not just a tick-box exercise; it's ingrained in our culture and values that we look after our customers.

One of the most delicate aspects is balancing the need for intervention with maintaining a smooth and welcoming experience for our customers. We aim to identify those who might be at risk without being intrusive. If a customer needs to be spoken to, my first recommendation to managers is to invite the customer into the casino where conversations can be held discreetly and in a welcoming environment.

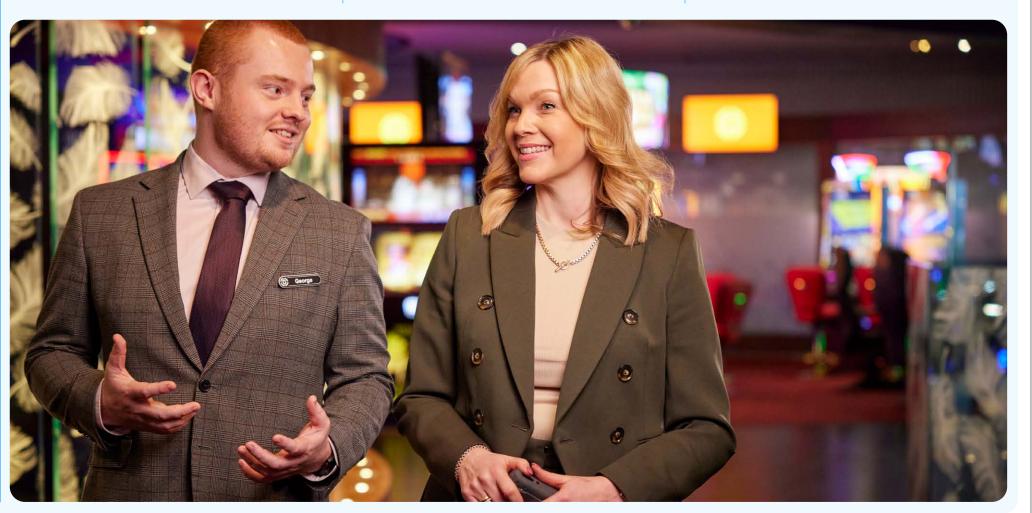
We make it clear it's a caring conversation, not a punitive one. We also have live, in-the-moment conversations, discreetly checking in with customers to ensure they are comfortable with their level of play. What was once awkward is now largely accepted; our customers are used to it and understand it's just a checking conversation to ensure they're okay.

We ensure that information about safer gambling is highly visible and accessible. In almost every area of our venue – including the restrooms and even on the main frontage outside – there are leaflets, posters, and signs. All customerfacing staff undergo regular safer gambling training, and crucially, safer gambling is introduced to new dealer trainees during the first week of their induction.

Our team, especially the dealers, are on the frontline, and they are incredibly vigilant. They get to know our customers, understanding what's normal for them, and can identify when a check-in conversation is needed.

Ultimately, we genuinely try. We offer our customers the opportunity for entertainment and excitement, but we are decent people, and the last thing we ever want is to negatively impact someone's life.

It's incredibly important to all of us that our customers are happy, gambling within their means, and if they're not, we put things in place. We spend a lot of time with our customers, so we truly care about them.



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# Safeguarding minors and vulnerable customers

and protecting our customers from harm are fundamental responsibilities for our business. This commitment is driven not only by our strict adherence to the UK Gambling Commission's Licence Conditions and Codes of Practice ('LCCP') and the requirements of DGOJ in Spain, but also by our core values as a socially responsible organisation.



# **Challenge 25**

If you are lucky enough to look under 25 you will be asked to **prove that you are over**18 to buy alcohol or tobacco.

If you are under 18 you are committing an offence if you attempt to do so.

### Acceptable forms of proof include:

- Valid Passport
- Photocard Driving Licence
- Any other form of identity approved by legislation



### To enforce this policy, we employ a range of verification methods, including:

### Grosvenor venues



A registration policy, IDScan technology, CCTV, and the presence of supervisors limit the risk of under-18s entering the premises. We also check the age of customers suspected to be under 25.

### Mecca venues



We check the age of customers suspected to be under 25, refuse entry to anyone unable to produce an acceptable and valid form of photo identification that states their date of birth, and refuse entry in any circumstances where an adult is accompanied by a child or young person.

### **Enracha venues**



Signs on entry state only over-18s will be admitted and identification must be shown to enter the venue.

### **UK digital**



We use third-party credit reference databases to check and validate customer registration details to prevent under-18s from gambling on our sites.

### Spanish digital



An age verification process is conducted using a service provided by the Spanish regulator.

### Preventing underage gambling

We maintain a zero-tolerance policy towards underage gambling. Individuals under the age of 18 are strictly prohibited from accessing our venues and online platforms, and we take decisive action to prevent and address any unlawful attempts to gain entry.

In compliance with advertising codes, a constant consideration in our marketing is to ensure that communications or advertising are not pitched in a way that would appeal to children.

Due diligence for the opening of a new venue includes local area risk assessments. This ensures appropriate decision-making and effective risk mitigation for locations that might be close to schools or youth facilities.

In the UK, our casino and bingo venues participate in collective mystery shopper programmes organised by the respective trade associations. This provides both the Group and the industry reasonable assurance that we have effective policies and procedures to prevent underage gambling. We have recorded strong results on the mystery shopper programmes and a monthly report on age checking is sent to the Compliance Committee.

Rank requires that all colleagues understand their responsibility for preventing underage gambling. This includes appropriate training, which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.

Number of breaches of no under-18s policy (UK)



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### Protecting vulnerable customers

Customer vulnerability can arise from a range of factors, including significant life events, changes in financial circumstances, addiction-related challenges, and underlying medical conditions. We also acknowledge that individuals under the age of 25 have the highest average problem gambling score of any group, as well as lower disposable income, ongoing neurological development impacting risk perception and common life stage factors like managing money for the first time.

The effectiveness of our approach to identifying customer vulnerabilities is, to a significant extent, reliant on the accuracy and completeness of the information provided by our customers. High-quality, up-to-date data enables us to implement safeguards more effectively, ensuring that measures such as self-exclusion cannot be circumvented. To support this, we remind customers of their responsibility to inform us of any changes to their personal details, including in our correspondence when an individual self-excludes and in our terms and conditions.

#### What's new?

Our Player Protection Business Partners are assigned to different regions in the UK and provide support and guidance to venues on customer risk assessments. In transitioning to a regional structure in Grosvenor, the Player Protection Business Partners now provide additional support to the Regional Directors, as well as the General Managers from the region, in reviewing specific customers. This includes identifying customers at risk and advising venues on steps to mitigate risk, training managers of venues, and overall performance management in terms of player protection. Similarly, in Mecca, they support the General Managers in delivering a safe environment for customers.

In our Spanish digital business, in compliance with Government regulation, we set the bar higher for communications with those customers aged 25 and under. Customers aged 25 and under that register with us are therefore sent a specific message to reinforce safer gambling and all the potential harms of gambling.

When a Spanish digital customer spends over a certain threshold, we will request information to confirm whether their level of spending is affordable. This can include asking for their occupation, requesting to see bills, salary, or annual tax return, and enhanced due diligence requirements to establish proof of origin of funds.

Age considerations	We set the bar higher in our marketing by not targeting promotional messages nor the products themselves towards anyone under the age of 25. We factor in the age of our customers as part of our affordability model and apply automodeposit limits for all customers who are under 25.
Local area risk assessments	Prior to the opening of a new venue, we carry out local area risk assessments, and then do so on a continuous basis.
Markers of Harm model	Using demographic, transactional, and behavioural data, and known markers of harm to assess customers, any individual that scores in the high-risk category will not receive any marketing from any of our brands.
Colleague awareness	All colleagues are required to understand their responsibilities relating to the protection of vulnerable customers as they are well placed to recognise changes in customers' circumstances when conducting interactions.
Colleague training	Colleagues in venues receive training relating to the protection of vulnerable customers and on how to recognise and respond to indicators of concern.
Referrals	We take appropriate action if a vulnerable customer is identified, including discussing with the customer the indicator the suggests vulnerability, signposting safer gambling resources and, if considered necessary, refer the customer to GamC for additional support resources and also remove the customer from marketing lists. We take action to limit a customer play or stop them completely with either a temporary or long-term suspension.
Contacting emergency services	The Threat to Life process ensures that if the customer may be at immediate risk of harm, colleagues are trained to contact the police to request a welfare check. If a member of our customers services team receives a call from a customer and identifies a threat to life situation, they can press a button while still on the phone to the customer which alerts their colleagues on the floor that they are speaking to someone vulnerable – this helps give the colleague suppor handling the situation as well.
Monitoring	Any potential or known vulnerabilities are recorded on a customer's account and taken into consideration when assess their play. We operate a system that captures contact details for the individual in case of an emergency.

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## **Product safety and quality**

### Regulation of products

In compliance with UK regulations, all equipment that we use in venues and for our digital business meets the stipulations outlined in our operating licences. All gambling equipment and software is sourced exclusively from companies licensed by the Gambling Commission ('GC').

All content providers must possess B2B certification from the Gambling Commission, and each individual game undergoes independent certification and testing by the supplier. We are also responsible for engaging third-party inspection/testing annually of our Grosvenor Casino live and direct products, which are games in venue livestreamed to our digital channels.

The gaming machines we utilise must adhere to specific Gambling Commission technical standards. These requirements vary depending on the type of gaming machines and pertain to game features, display notices, and general machine operation.

Additionally, the Gambling Commission has established technical standards for remote gambling systems, detailing the specific technical and security requirements that licensed remote gambling operators and gambling software operators must meet.

The venues compliance team visit a minimum of 24 venues in the UK per year and perform a wide-ranging compliance and licensing check in a second line of defence role. The venues' teams themselves perform quarterly internal checks on machine numbers and machine compliance.

Our Compliance Manager for the Spanish land-based business conducts audits of the Enracha venues every three months to ensure that the licences on gaming machines are valid. Each autonomous community has its own regulatory requirements for machines, which include rules around display of information, average game duration and value of prizes.

All gambling products installed in our Spanish venues are certified in accordance with regional regulation. Each machine must have its individual homologation paper (which is completed by the supplier) and fulfil the legal Return to Player ('RTP') rate. The legal team also ensures that the licences are displayed in the venue. The regional gambling authorities visit each venue three times during the year and conduct an assessment of a different aspect in line with the local municipality requirements.

### Key regulatory requirements in the UK include:

### Speed of play



Ensure that games cannot be played at a speed significantly faster than the manually operated equivalent, and that the player is given adequate time to place their initial and any subsequent bet(s) within the game.

# Display of information on players' game devices



Game devices must be capable of clearly displaying certain information.

# Random number generation for digital games



Ensure random number generation is 'acceptably random' and demonstrate to a high degree of confidence that the output of the random number generators ('RNG') is random.

### **Testing**



The Gambling Commission's Licence Conditions and Codes of Practice ('LCCP') requires that all non-remote gaming machines, technical gambling software and remote operating licence holders must comply with technical standards and requirements set out by the Gambling Commission, relating to the timing and procedures for testing.

# Games test reports (remote gambling and gambling software)



Games test results and RNG test results must be submitted to the Gambling Commission to provide assurance that new games (or major updates of games) comply with the Remote Gambling Software and Technical Standards ('RTS'). It also assures that the RNG-driven products, such as casino, bingo, and virtual betting, comply with fairness specifications.

## Games test reports (gaming machines)



The gaming machine testing strategy requires gaming machine technical licence holders to conduct testing on new games and submit the results to the Gambling Commission. Games testing must be carried out by an approved test house.

### Non-gaming areas



All casinos in the UK must devote 10% of the venue to non-gaming areas, which are usually devoted to food and beverage.

For our Spanish digital business, any new games must be approved and homologated by the DGOJ. We conduct a monthly internal check of the RTP rate, specifically evaluating any significant variation.



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### **Product performance**

Maintaining oversight of our product performance is essential for delivering a seamless and enjoyable player experience, while simultaneously ensuring that our games operate in full compliance with all applicable regulatory requirements.

We track the performance of our equipment across all our brands, both online and in physical venues. Proactive monitoring system enables us to identify and address any potential issues as swiftly as possible, minimising disruption and upholding the integrity of our gaming operations.

Ongoing performance reporting also informs our longer-term strategy regarding the types of game we want to bring on board and the suppliers we want to work with.

### Venues games

To uphold compliance and maintain the integrity of our operations, the testing of physical games is conducted at each venue. In the UK, this is done through a task management system, while in Spain testing is led by our Compliance Manager who audits venues every three months. Furthermore, all equipment and materials are sourced exclusively from nominated suppliers.

### Digital games

For our UK digital business, all suppliers are required to monitor the performance of the gambling software they provide. This tells them whether a game is under or over performing. The RTP rate is the key metric we use in monitoring games across our digital brands.

For each game, the expected levels of performance across a number of rounds are assessed, as there will be variance in the RTP. This establishes the bounds within which a game should be performing. Therefore, if the RTP is consistently or significantly outside the usual levels, this can be quickly identified, and we can investigate whether there is a defect in the game.

# Physical gaming machines: Grosvenor and Mecca



Operating standards for all hardware are in place for Mecca and Grosvenor to eliminate faults, such as broken buttons or glitches in machines. Our Grosvenor gaming machines have fault logging to highlight and measure any product quality issues, while all our Mecca gaming machines have data capture which allows us to see when a machine is offline. We also have daily gaming machine reports which can flag issues such as terminals not connecting, unusual margins, or promotional spend abuse. Our operations teams have a daily checklist that is targeted to report or remove product issues at the start of each session or day.

### Table games: Grosvenor



The shuffle machines are cleaned and checked weekly; the front and back of playing cards are checked daily to ensure they are in good condition; we make sure all cards are present at the start of a gaming session; all table games are supervised and all games in the venues are monitored by CCTV and the footage is reviewed on an ad hoc or as needed basis; and win percentages are reviewed daily and weekly to monitor performance.

# Roulette wheels: Grosvenor



Roulette wheels are cleaned and balanced daily, and weekly drop zone tests are conducted. We utilise Wheel Management Software to analyse data from games to ensure the equipment is balanced and without bias, and the wheels are certified by the supplier. All balls are purchased from a nominated supplier, stored securely, and checked by our gaming teams. The data from wheels in all venues can be accessed centrally on one system allowing our central team to detect wheel imbalances and alert the relevant venue's team to investigate.

# Physical gaming machines and games: Enracha



Similar procedures are in place and testing is completed in respect of machines in our Spanish venues. To guarantee they are operated honestly, gaming machines in Enracha venues are subject to internal tests and external tests, by both the company that markets them and the Spanish gambling regulator, General Directorate for the DGOJ. Each gaming machine must undergo a review every four years in line with regulatory requirements. Each slots area is checked every day prior to the opening of the venue. We check the bingo ball extraction machines work properly, as well as checking every single ball before the first game, every day in the venues.

When a game does present an issue, the supplier will notify us immediately, and the game will then be removed from the site immediately. The supplier will investigate the incident, and an investigation will be launched internally, including addressing any compliance issues and ensuring any players impacted are correctly compensated.

In Spain, testing of digital games is undertaken by a certification company authorised by the regulator.



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## **Ethical marketing**

### Compliance of advertising

In marketing our products, we are seeking to effectively communicate our offering to only our intended audience, while simultaneously upholding responsible advertising practices that align with regulatory requirements. Balancing the dual objectives necessitates rigorous checks and balances, which are well-established across the Group.

In the UK, the Advertising Standards Authority ('ASA') oversees companies' advertising approaches. The established advertising codes, consumer protection laws, and licensing requirements together stipulate all operators must ensure that promotional communications are restricted to the intended audience and that advertisements do not idealise gambling or its perceived benefits. In Spain, requirements for online gambling promotions and advertising are set by the Spanish Royal Decree 958/2020. Rank's membership to the BGC also compels the Company to adopt the industry body's Code for Responsible Advertising.

#### What's new?

We have well-established controls and procedures in place for our marketing. To make our responsible and compliant approach to marketing understood across the Group, we introduced a new Ethical Marketing Policy. The Policy details our responsibilities and commitments as they pertain to advertising in the UK (regulation varies by jurisdiction, and there are different requirements for the Spanish market). We have made the policy available on our website.



### Internal expertise



Our marketing team members possess the requisite knowledge of the advertising codes. Any new or significantly different materials that are produced are reviewed by our compliance team before release for tone, intent, and whether materials are in violation of any regulations. Within the compliance team, we have subject matter experts who are the specific point of contact for the marketing teams. We have an online resource hub which houses guidance and which we update with additional guidance following new rulings; this can be accessed through Connect (our communications and engagement platform) and we direct the marketing teams to this resource. We have also delivered training to Mecca venues' teams in relation to social media posts.

### **External approval**



Broadcast advertisements are reviewed to ensure they are compliant ahead of submission to Clearcast (a non-governmental organisation that preapproves most television advertising in the UK, <a href="https://www.clearcast.co.uk">www.clearcast.co.uk</a>).

### Due diligence



We conduct thorough due diligence when working with affiliates or other third-party marketing firms, ensuring compliance with our terms and conditions (which includes a requirement to comply with all applicable laws and regulations) and approval processes, and we continuously monitor their compliance performance.

### Social media guidelines



We have established clear criteria for our social media interfaces with customers (and non-customers). We stringently vet the follower base of social media influencers to ascertain that their underage following across all platforms does not exceed our thresholds, in either percentage or absolute terms, to establish whether they have strong appeal to a younger audience. As standard, we do not operate on TikTok, as it has a relatively larger base of under-18s. We also refrain from using emojis that could be seen as appealing to children. When we execute paid social media campaigns, these advertisements are only targeted at people over 25 years old, and we only show YouTube ads to people that have been age verified.

### **Age-gated promotions**



All online interfaces are executed within established parameters; all our online promotions are age-gated and contain the necessary signage indicating potentially harmful content for underage viewers.

For our Spanish operations, the Spanish Royal Decree 958/2020 regulates online gambling promotions and advertising. One element of the legislation is aimed at protecting children from underage gambling. It mandates that gambling communications and sponsorship are only allowed under very strict scenarios, promotions allowed only on operators' sites or to registered customers, and all advertising must include a clearly displayed 18+ icon.

The regulations also require measures to be taken to ensure children below the age of 18 are not targeted by gambling adverts. Furthermore, advertising on TV and radio is restricted to certain times of the day. We strictly adhere to all relevant legislation.

Upheld breaches of advertising codes



# Going beyond regulation

To uphold our commitment to responsibly marketing our products, we take additional precautions to prevent appealing to audiences other than those we intend to reach. When sending directly mailed communications, we make sure any appealing messages or images used are fully concealed in the envelope addressed to the individual. For Grosvenor digital, our targeted offers are split according to customer value segment; this ensures that promotions are appropriate to each individual's level of play.

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#### Safer gambling and advertising

Communicating our safer gambling message is a critical consideration in advertising. In the UK, in compliance with BGC commitments, the safer gambling messaging must be included in all advertisements. Additionally, 20% of our 'above the line' (broad, mass media advertising) media expenditure in the UK is reserved for safer gambling messaging on campaigns.

To protect our customers' safety, we suppress any marketing communications to those customers who have self-excluded. If a customer that previously self-excluded rejoins (only after a review and approval by the business), they are not automatically re-added to our marketing lists; rather, they must themselves opt in to receiving communications again. Furthermore, any UK digital customers scoring over a particular level on our Markers of Harm model are prevented from receiving CRM activity and have reduced visibility of on-site marketing and promotional assets.

For the venues business in Spain there is no obligation to display the 'responsible gambling' message in our operating locations of Catalonia, Madrid, and Andalusia, however, we always add the message to our advertisements.

For the digital business in Spain, while we always display the responsible gambling message when required, the obligation to do so is dependent on the following: content and type of communication, communication channel, the targeted users/those potentially impacted, and which company is responsible for the communication.

We also have a policy not to sponsor within sport other than horseracing and greyhound racing, to prevent the promotion of our products and services to children and young adults.



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## **Customer service**

We are committed to providing exceptional service to our customers. Customer interactions occur both in person, with our colleagues in venues, and through our various customer service channels, with the customer service centre.

Our objective is to offer timely and friendly support to all customers, wherever they engage with the business. Furthermore, the feedback we receive is invaluable for gaining insights, implementing improvement, and evolving our product offering, thereby ensuring we are delivering the most relevant services to our customers.

Safer gambling also clearly informs customer interactions; for more details on our approach to engaging with customers from a safer gambling perspective see page 23.



#### **Communicating with customers**

To support accessibility and ease of communication, we provide a number of dedicated customer feedback channels. To monitor the effectiveness of these channels, we track our response times and ability to resolve issues in the first instance. We are committed to the ongoing adaptation and improvement of our service provision, implementing alternative methods for customers to initiate contact, and introducing new technologies to reduce our response times.

# Face-to-face interactions in venues



In our Grosvenor, Mecca, and Enracha venues, customers can speak directly to colleagues. Colleagues in all our venues have received training on how to support customers and deliver an excellent experience.

#### **Website contact options**



There are 'Support' pages on the websites of all our digital brands. For our UK digital businesses, this takes customers to our new self-service support hub. Live chat functionality is also available on the support hub if the customer is unable to find the answer to their query.

For our Spanish digital brands, customers are directed to the support page which includes frequently asked questions, as well as live chat, email, and telephone contact options.

#### **Complaints policy**



Complaints in venues can be received by the colleagues on the floor or escalated to the venue's general manager. In all our UK and Spanish venues, complaints can also be submitted via email or a physical complaints form, or posted online through search engine reviews, which our marketing team review.

Our Complaints Policy and contact details are available on the website of all our UK digital brands. Through the support section on our Spanish digital websites, customers can use the contact details to submit complaints. The chat moderators on the Mecca and Spanish brands' bingo chats also feed back any complaints from that channel.

#### **Chat hosts**



On our Mecca site, the online chat room feature always has a Chat Host present to converse with customers. Our bingo chats on our Spanish digital channels also have chat moderators.

# Customer Net Promoter Score ('NPS')



To assess customer sentiment, we track customer NPS across our brands. This is also one of our eight key performance indicators, for which we set a target annually in order to drive progress.

In the UK, when a new colleague joins the customer service centre team, they go through the Academy. This is a 12-week training programme which introduces the business and its products, as well as equipping new team members with the skills required for their role. In Spain, before they can begin taking customer calls, new members of the team undertake two weeks of specialised training.

All frontline colleagues receive safer gambling training to improve their ability to recognise vulnerabilities in individuals who contact the team and, if they arise, to be able to handle 'threat to life' situations. In the UK and Spain, we maintain a dedicated communications channel with the safer gambling team for any of our customer services team to raise queries on

#### What's new?

Last year we began a customer service transformation programme to improve the customer experience. This has involved implementing new tools and technologies, and we have already seen positive results from this transformation programme.

The introduction of new self-service portals for all our UK digital brands has enabled customers to easily and quickly resolve a multiple of queries without having to speak directly with a member of our team. The portals cover a wider range of topics and easily guide the customer to the possible solutions with clear instructions. The portals are constantly updated to reflect any changes in the business. If a customer is unable to troubleshoot the issue, there is a chat function available to help resolution.

Since going live, the portals have resulted in fewer requests to our team, allowing our customer service champions to deal with more complex issues. We have also introduced AI tools to support our customer service team members. Chat Assistant AI suggests answers to common queries during live chat, significantly reducing our response times.

We have embedded a voting system into the portals, with each page including a 'Was this article helpful?' question at the end. The feedback helps us assess whether the information provided was helpful and accurate or whether changes need to be made.

We have also introduced AI tools to support our customer services team. The Chat Assistant AI supports team members by suggesting answers to common queries for live chat, significantly reducing our response times. Summaries of customer interactions can also be produced by the AI tool, saving additional time.

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#### Responding to feedback

Our customer service centre champions are the frontline colleagues trained to deal with the majority of complaints, while more complex issues are escalated to the second line team. Customers in the UK have the option to seek independent adjudication of complaints through the Independent Betting Adjudication Service ('IBAS'). We have a weekly report on customer service in the UK which is shared with management and the wider business unit.

To leverage customer feedback to implement improvements in our service delivery, our quality and monitoring function assesses all customer interactions and provides direct feedback to team members. We utilise a case management system to categorise complaints, enabling us to track trends and identify common or recurring issues requiring attention.

Following each interaction with a customer in the UK, customers receive an email survey to rate the service received, indicate whether the issue was resolved, and provide further comments. We employ text analysis to extract insights from this feedback. All data is used to identify broader issues for root cause analysis and to determine appropriate resolutions. Findings from the gathered feedback are shared internally with relevant teams to drive continuous improvement.

This year, our Spanish digital business has commenced tracking customer satisfaction rates via a new platform, incorporating a post-chat survey. The customer service manager reviews survey responses daily. We will begin processing survey data to assess trends and inform and update our approach as appropriate. This year, we have seen an increase in our customer NPS, reaching 54. This exceeded both last year's NPS and our target of 51 for this year.



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# **Health and safety**

With both customers and colleagues visiting and working at our venues across the UK and Spain every day, we must ensure we have the right procedures in place to protect their physical health and safety ('H&S').

We maintain the highest standards of H&S and continually update our processes to align with local government regulations and industry codes of practice.

In the UK, we have a dedicated team responsible for overseeing the management of H&S at all our clubs and support offices. The team is led by our Head of H&S, who is supported by a team of H&S regional managers. In our venues, our General Managers are delegated the responsibility of meeting our adopted standards. Our H&S team is responsible for overseeing H&S and food safety, while responsibility for the management of fire safety has been divided between the in-house H&S team and an accredited third-party provider.

In Spain, health and safety is managed by an external provider. This provider operates in compliance with Spanish law on occupational risk prevention, taking actions to minimise risk to the health and safety of employees, including risk assessments, preventative planning (specific actions to prevent identified risks from occurring) and carrying out medical check-ups. Training is also provided to colleagues when they join the business, and refresher training is carried out when required. Audits of venues for health and safety and food safety are conducted. Firefighting equipment is subject to regular maintenance and inspections.

Number of RIDDOR\* (UK)

10

Audits	$\bigcirc$	The H&S team visit every club and support office once a year to conduct a comprehensive H&S and food safety audit, with further support provided where required. The H&S team also monitor fire safety between the formal fire risk assessment schedule.
Fire safety	$\bigcirc$	Fire safety is managed through a combination of third-party fire risk assessments and interim monitoring by the H&S team. Further to the completion of the fire risk assessments this year, the H&S team will create a fire risk profile for the estate which will determine the frequency of fire risk assessments going forward. This will be verified and agreed with our primary fire authority, Hampshire Fire & Rescue.
Food safety		Our Food Safety Management System and Allergen Policy govern our food safety processes and both are supported by comprehensive 'How to Manage' guidance including how we approach customers about allergens.
Learnings	$\bigcirc$	Audit results are communicated to the venues' leadership team and their progress is monitored on an ongoing basis. The H&S team revisit venues to provide additional support where needed, assisting the venues' operations with the implementation of escalated actions stemming from audits and conducting additional reviews as necessary. The frequency of these revisits can vary based on specific needs.
Facilities management	$\bigcirc$	The H&S team work collaboratively with the internal and external facilities management team to ensure that plant and equipment maintenance and compliance is included in the venue audits.
Policies	$\bigcirc$	H&S policies are reviewed on a regular basis and assured by our prime authority, Wakefield Council. Current policies include Health and Safety, Accident Management, Allergen Management, Asbestos, Controlling Contractors, Display Screen Equipment, Fire, Food Safety Management System, Hazardous Substances, Legionella, and Working at Height. The H&S team also provide comprehensive 'How to Manage' guidance documentation to support policy implementation.
Health and Safety Management System ('HSMS')		Our HSMS has been developed in accordance with HS65 guidance published by the UK Government's Health and Safety Executive. This comprises policy, procedures, risk assessment, training, and communications, as well as the mechanisms to enable timely review. We are in the process of centralising H&S incident data from our international support offices, with the exception of Spain, who manage their own H&S separately.
Annual training	$\bigcirc$	H&S training is available to colleagues on our online platform, Springboard. There is basic H&S training for all employees which must be completed during onboarding and then annually. We have implemented mandatory fire safety training as a separate course for all our employees.
Specialised training		Specialist training courses are made available to venues-based employees, the extent of which varies depending on an individual's roles. Fire warden/marshal training is delivered to those who have specific fire safety responsibilities. Food safety training has been extended from Level 2 (which all food handlers are required to have by law) to Level 3 (which provides more detailed training) on a continuous rolling programme.
Reporting		Audit data, updates on the training completion, and planned preventative maintenance ('PPM') reports are communicated to the Risk Committee monthly and to the Audit Committee twice a year or more frequently as required.

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#### Aim: Be an admired employer

How we measure progress:

**Employee engagement score** 



Above target of 8.0

Percentage of women in senior roles\*

**32%** Below target of 40%



#### Our colleagues are critical to the long-term success of our business.

Enabling colleagues' growth through engaging work and the right learning and development opportunities continues to be a focus. Demonstrating how we value our colleagues, we continue to promote their wellbeing, foster an inclusive working environment, and recognise and reward their hard work.

Our double materiality assessment highlighted the colleaguerelated IRO with the highest importance from both an impact and financial perspective. The risk of a 'poor employee value proposition resulting in poor employee satisfaction' is reflected in the investment we have made into engaging with colleagues; the subsequent sections detail how we leverage different communications channels to listen to and respond to colleagues, and our engagement score, which surpassed its target, demonstrates the progress we are making. The DMA also flagged the risks around recruitment and attrition; we are continuing to improve our talent attraction approach and have set our ambition of becoming an admired employer.

is important from both an impact and financial materiality perspective. The evolution of our Talent and Learning Strategy is aligned with the specific needs of each business unit, and this report highlights the extensive array of training platforms progression of colleagues.

Offering effective learning and development opportunities and development programmes in place to support the continued 41 of 88

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\* These roles are defined according to the Companies Act 2006 definition of senior managers, which for Rank includes Executive Committee members, Executive Committee direct reports who are M1 and M3, and any statutory director not covered by the above. This now includes the direct reports of two senior colleagues within our UK digital business.

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# Learning and development

#### **Development opportunities**

Enabling our colleagues to grow and develop their skills is a key part of our employee value proposition. Our wide-ranging learning and development offering gives colleagues in every business area and location the opportunity not only to excel in their roles, but also to advance their careers.

Tailored management and leadership programmes enable us to nurture and build talent within the business and develop a strong pipeline of future leaders and managers. We also support the learning and development of our Board, providing regular corporate governance and industry updates, with particular focus on safer gambling and ESG matters, and specific director training.

#### What's new?

We have evolved our Talent and Learning Strategy to identify the priorities for continued colleague development and growth across the Group and within business units. This has been aligned with specific business needs and supports our areas of focus across the development of our colleagues. We continue to expand our Mentoring@Rank programme, and this year we increased the places to 250 for mentees and mentors. This crossorganisational programme provides colleagues with the unique opportunity to connect with others from across the business and learn from different perspectives, with mentors and mentees building supportive relationships to facilitate development.

The mentoring programme has received positive feedback from participants, rating the quality of the programme at 4.3/5, well above average and increasing month on month. We have also achieved a more balanced gender representation, with 32 female and 49 male mentors. We delivered webinars to support participants in progressing their mentoring relationships, and hosting group sessions for mentors, where they can share and learn from each other's experiences.

Following the development of our Leadership Framework (which establishes leadership expectations and supports succession planning), we are building out our central offering for management and leadership development. As part of the first phase, core and essential management modules have been built into programmes being delivered in Mecca and UK digital and has underpinned our Management Essentials programme being delivered in Mauritius. The framework will be a consistent foundation of the development programmes across the Group. The second phase will include further management development, core leadership modules, and a programme for our high potential individuals ('HiPOs').

E-learning platforms		Our e-learning platforms each serve to support a different aspect of our colleagues' development. Springboard offers over 700 courses in professional and personal skills development, as well as being a hub for our mandatory training courses. Love to Learn provides tailored learning, education, and development for colleagues, allowing individuals to create individual playlists of learning. Udemy technical training continues to support our colleagues working in specialist digital and technical roles. We have enhanced our licences allowing us to curate learning into career pathways, linked to roles and progression. For our Spanish venues business, our training platform, Enracha Campus, gives colleagues access to different soft skill courses, and also acts as a means of talent detection, identifying colleagues that have obtained strong results on completion of training courses.
Performance reviews		Annual performance reviews and mid-year check-ins are carried out. We are improving the process, with more colleagues completing their review online. We will also be offering Development Planning and Goal Setting drop-in sessions and workshops. At Board level, annual skills reviews are conducted to assess knowledge and experience of our Directors, while our Executive and two levels below Executive are reviewed biannually to consider high potential capability and any competency gaps. Our CEO, CFO, and CPO meet every six weeks to specifically discuss talent, development, and their reviews feed into the biannual process.
Succession planning		Succession plans are maintained through the Nominations Committee for the Board, Executive Committee, and other members of the Senior Leadership Team. Our Leadership Framework identifies consistent leadership expectations and helps to ensure that there will be continuity of capability in key roles and that any risks are mitigated. Data and insights from talent reviews are utilised to identify future talent and skills required, inform the development opportunities required, and feed into our strategic workforce planning.
Supporting external qualifications	$\bigcirc$	A formal process enables colleagues to apply for financial support to undertake external training, such as a master's degree, Mini MBAs, and project management courses, that will support their professional development and build capability in their role.
Supporting external qualifications		Apprenticeships are used as a tool to develop and upskill individuals within the business or prepare them for management roles. Colleagues have completed apprenticeship qualifications in a range of functions including HR, Leadership & Management, Internal Audit, Facilities Management, and F&B Leadership. These programmes provide hands-on learning, professional qualifications, and valuable experience, all fully funded through Rank's apprenticeship levy. This will remain an area of focus for us into 2026.
Mentoring and coaching	$\bigcirc$	Mentoring@Rank programme provides exclusive internal mentoring opportunities that allow colleagues to network with, learn from, and support each other's development and growth. Bespoke performance coaching is also offered to members of senior management with succession potential, and we use a roster of qualified external coaches and mentors to provide support.
Development programmes	$\bigcirc$	Bespoke development programmes, including our Henley Partnership and Shine (Women in Leadership), are offered to colleagues. Magnify your Game, Future GM Programme and Our Management Essentials are development programmes for Mecca, Grosvenor, and UK digital focusing on future talent and developing a succession into key roles across our venues. For our Spanish venues business, Silver Talent is a scheme intended to provide professional development of skills and technical abilities for high potential individuals. This is a two-year scheme with training on leadership, competency, and business management, delivered across 12 classroom and six online sessions led by external trainers and experts in each subject area.

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#### **Case study:**

Our colleague Stephen talks about his mentoring experience



It's true what they say that you learn something new every day. That's been my experience since I decided to venture into the world of marketing, a completely new direction for me.

As an Assistant Manager at Mecca in Taunton, I naturally gravitated towards improving the venue's marketing efforts – creating engaging social media content and staying ahead with our point-of-sale materials. This hands-on experience sparked a new passion for marketing.

Curious to learn more, I connected with colleagues in Mecca's marketing team and decided to pursue a CIM qualification in digital marketing to deepen my understanding.

Around the same time, I applied for the company's mentoring programme, hoping to be paired with someone with marketing expertise. I was matched with Elliot Golchewski from the Personalisation team in Rank's Gibraltar office.

As I progressed through my studies, my enthusiasm for marketing grew. Then an exciting opportunity came up – a Marketing Executive role in Grosvenor Casinos. It felt like a pivotal moment, but the idea of moving into an office-based role gave me cause to pause.

Elliot's support was invaluable. He helped me prepare for both interview rounds, including crafting a presentation for the second stage. Importantly, he empowered me to do the work myself, offering constructive feedback and boosting my confidence. The result? I secured the role on a six-month secondment — a major milestone in my career transition. Elliot also supported me with feedback on my main CIM assignment.

This journey has taught me it's never too late to learn something new, discover a passion, or take a leap of faith. I encourage anyone considering a mentoring programme to grab the opportunity.

Learning and development

#### Talent attraction

To attract the best talent to our business, an effective and inclusive hiring process is essential to our business success. We have taken a number of steps to make sure we are reaching the widest possible pool of talent. We publish job vacancies across a range of platforms, utilising the primary channels in each location. We also collaborate with job centres to advertise vacancies where there is a specific location-based need.

To promote inclusivity in our hiring process, refresher training on unconscious bias was conducted this year. As planned, we have implemented hiring manager interview training, which has been launched across Mecca and is currently being rolled out across Grosvenor, with subsequent implementation planned for the remainder of the Group. Where feasible, and as part of our ongoing training initiatives, we are encouraging the use of mixed interview panels with diverse demographic representation.

We are in the process of migrating our recruitment system to the same platform as our core HR system, Dayforce. This integration will enable us to not only better track the diversity of our candidate pool, allowing us to monitor our reach more effectively, but also to more easily track candidate feedback, which will help inform our recruitment decision-making processes.

For new General Managers joining Mecca, we have rolled out a rotational training programme. This programme includes a comprehensive checklist of key areas to be covered during the rotation, providing a structured introduction to the business for new personnel.

Our Gaming Academies, which run across Grosvenor venues, are six-week intensive training programmes for individuals who want to learn dealing-based casino games. We recruit people specifically for these courses, providing skilled employment and free training.

We are actively working on enhancing brand recognition. In the UK, Mecca and Grosvenor are well-established and recognised brands, however, we know our digital business could benefit from further investment in our colleague branding, particularly in our locations outside of the UK and Gibraltar.

We are undertaking a significant colleague branding initiative in Mauritius, with a major branding campaign planned to support the ongoing attraction of talent into both locations, but also to better market our digital business as an admired employer of choice.

Percentage of management roles on leadership training programmes

**53%** 

Number of colleagues who have been trained by Grosvenor to be licensed dealers

298



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**The Rank Group Plc** Sustainability

Report 2025

# Equality, diversity, and inclusion

Advancing equality, diversity, and inclusion ('ED&I') at Rank means creating a culture where all colleagues feel valued, respected, and empowered to contribute their best. To drive ED&I progress, we have three strategic aims:

- 1. To be recognised as an admired employer worldwide, known for attracting and retaining top talent, we will create a colleague experience that showcases the opportunities to work, win, and grow at Rank across all our global locations.
- 2. Remove perceived or actual barriers to career progression and drive a continuous learning and development culture that enhances our global talent pool's performance, positioning ourselves as an admired employer with ambitious teams.
- 3. Create an inclusive and diverse global culture that embeds equity into all business practices, ensuring every colleague feels valued, recognised, respected, and empowered to contribute their best, thereby driving higher engagement and performance.

These embody our commitment to emphasising authentic and meaningful internal actions over external perceptions. Embedding ED&I principles into our culture and every stage of the colleague journey remains a crucial priority. Our gender pay gap improved this year; the median gender pay gap was 4.3%, a reduction from 5.2% in the previous year.

Aim 1: To be recognised as an admired employer worldwide, known for attracting and retaining top talent, we will create a colleague experience that showcases the opportunities to work, win, and grow at Rank across all our global locations.



We are proud to have exceptional female leaders at Rank, and it is always rewarding to see their talent recognised. This year, our Director of ESG, Sarah Powell, and Transformation Director, Saffron Pawar, were featured in the Hospitality, Travel, Leisure, and Retail ('WiHTL') 2025 Women to Watch Index, which highlights inspiring stories of women across the sector.

Our Head of Marketing Procurement, Jade Wigmore, was also featured in Novo-K's Advancing Women in Procurement, released for International Women's Day. Myra Cooke, Talent Development Lead, was shortlisted for HR Diversity Champion of the Year at the British Diversity Awards 2025.

This year we had two female leaders from our venues business shortlisted at the 2025 Women in Gaming Diversity Awards: Sarah O'Neill, Mecca Central Operations Director, was shortlisted for Industry Achiever (Operator) and Inspiration of the Year (Operator) and Sue Price, Grosvenor Director of Table Games, was shortlisted for Positive Role Model of the Year (Operator) and took home the award for Industry Achiever (Operator). At Board level, Karen Whitworth, Senior Independent Director, was shortlisted for The Sunday Times 2025 NED Awards, recognising her contributions to Rank's long-term success.

We are also proud to have been shortlisted for Company of the Year at the 2025 Women in Gaming Diversity Awards. Being recognised as a finalist is a strong reflection of our ongoing commitment to building a diverse, inclusive workplace and our ambition to be an admired employer worldwide.

To support the development of future female leaders, at the end of the previous year we launched Shine, a career development programme designed to help women gain clarity on their career paths. The three-day programme enables participants to build a personal and professional vision, and since the pilot, two participants have been promoted internally. This year, another eight women recognised for their leadership talent completed the programme.

Through our WiHTL partnership, we continue to support ED&I in the industry while creating development opportunities for colleagues. In 2024, we had colleagues participate in WiHTL's Women NED and Global Women Leaders programmes. We will continue to support more colleagues in accessing these and similar development opportunities to strengthen female leadership across the business.

Our colleagues also contribute to WiHTL committees, bringing best practices back into the business in areas such as HR leadership, data and insights, race and ethnicity, accessibility, and employee networks. In addition, Rank is represented in Global Gaming Women, a network dedicated to supporting, inspiring, and empowering women in the gaming industry.

Aim 2: Remove perceived or actual barriers to career progression and drive a continuous learning and development culture that enhances our global talent pool's performance, positioning ourselves as an admired employer with ambitious teams.

Rank is committed to creating an inclusive workplace, with a zero-tolerance approach to discrimination embedded in our company policies. All colleagues complete mandatory ED&I training, including a new module aligned with the Worker Protection (Amendment of Equality 'Act' 2010) 2023, ensuring awareness of workplace safety and harassment prevention.

Policies are regularly reviewed to align with strategic ED&I aims, including flexible working and enhanced maternity leave for colleagues in leadership pathways. The Family-Friendly Policy in the UK and Gibraltar provides support for adoption, maternity, paternity, parental, and shared parental leave, as well as time off for dependants, pregnancy loss, and fertility treatment, ensuring colleagues receive the flexibility and support needed during key life events.

To attract and retain diverse talent, ED&I principles are embedded into recruitment. Hiring managers have received specialist training, along with the creation of hiring guides to ensure fair and inclusive hiring processes. Additionally, general managers, assistant managers, and team leaders have been trained on the importance of onboarding in our venues and inducting new starters, reinforcing Rank's commitment to a supportive and inclusive workplace.

A colleague dashboard tracks workforce demographics, gender, and location to monitor ED&I progress, ensuring Rank continues to build an equitable and diverse organisation.

Rank launched Connect, a global colleague communication and engagement platform in 2024, designed with accessibility in mind. Available via app and web, it offers instant translation across locations, ensuring all colleagues can stay informed and engaged.

Our employee opinion survey in November 2024 introduced a new ED&I question on career development and progression, receiving a positive engagement score of 8.0. When asked about barriers to career progression, 91% of colleagues reported seeing none. Comments were followed up further locally and were also shared with our colleague network groups to help identify opportunities for further improvement.

Aim 3: Create an inclusive and diverse global culture that embeds equity into all business practices, ensuring every colleague feels valued, recognised, respected, and empowered to contribute their best, thereby driving higher engagement and performance.

Rank's colleague network groups provide a platform for colleagues to share their voices in a safe and supportive environment. The five groups - Women@Rank, LGBT+, Racial Equality & Diversity, Accessibility@Rank, and Worklife & Wellbeing – play a supporting role in driving ED&I forward. Progress updates are provided to the Board.

To strengthen their impact, each group now has additional sponsorship from the People & Culture leadership team and will take part in a workshop to define best practices and agree a strategy and key aims. These networks are also integrated into Connect, Rank's global communication and engagement platform, to expand their reach and encourage participation.

ED&I events highlight the year-round efforts of colleagues in driving inclusion. These initiatives are aligned with our network groups and are further supported by our learning platforms and external partnerships, including Inclusive Employers and WiHTL. We also utilise Love to Learn, our digital learning platform, to promote content linked to our annual engagement calendar, sharing curated lists of learning materials (e.g. articles, videos, courses, quizzes) for events including World Day for Cultural Diversity and Pride month.

Gender pay gap (median)

Colleagues reporting seeing no barriers to career progression at Rank

4.3% 91%

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#### Case study:

Interview with Saffron Pawar, Chair of the Racial Equality and Diversity ('READ') colleague network group



#### What has been your objective as Chair of READ?

I've had the privilege of chairing the READ (Race, Ethnicity and Cultural Diversity) network for the past three years. The group brings together colleagues from across the business, giving everyone the opportunity to be part of the conversation, no matter where they work.

The objective has been simple: to provide a safe, open space where colleagues can share thoughts, ideas, and challenges around representation at Rank. As we operate in some of the most demographically diverse parts of the UK, we are very aware that our teams should reflect that diversity.

#### What's been achieved so far?

As well as providing a safe space for colleagues to share lived experiences and talk about any challenges they may be facing, this year we raised our visibility by recognising World Day for Cultural Diversity, where we arranged a cultural pack exchange between our global offices, giving colleagues the chance to share customs and traditions. We also invited everyone to get involved on our communications platform by sharing a photo, memory, or short story about their heritage or culture that has had a meaningful impact on their life.

We have worked on expanding our network's reach and now have increased participation from our colleagues in South Africa and Mauritius – ensuring our work continues to reflect Rank's global footprint.

#### What's next for the READ network? Ethnic representation at senior levels.

The READ network would like to work with the business on capturing ethnic promotion data so we can better understand progression trends and identify any barriers. We would like this data to be used in learning and development plans and talent reviews to support equitable growth opportunities.

#### Improving the impact of unconscious bias training.

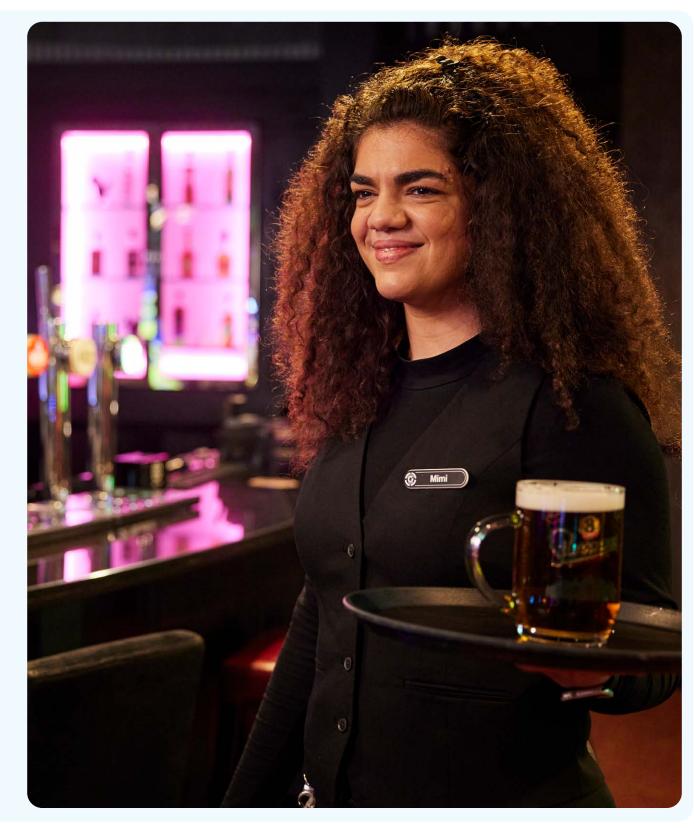
While hiring managers currently receive unconscious bias training in venues, we believe there's an opportunity to make this training more impactful across the business. Moving some learning out of online training platform and into live environments, such as strategy days, will increase relevance, engagement, and reflection.

## Inclusive communication through Al-enabled translation.

We see a strong opportunity to introduce AI-enabled translation tools for in-venue communication and training. This would ensure colleagues (and customers) with English as a second language feel included.

## How do you communicate your efforts across the Group?

We utilise a dedicated network page on Rank's internal communications platform, where we share educational resources to deepen understanding and appreciation of the diverse cultures that exist across our business. We believe that when colleagues see their backgrounds, cultures, and identities reflected and respected in the workplace, they feel more seen, heard, and valued – and that positively impacts job satisfaction.



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# **Engagement and reward**

#### Colleague engagement

For a business of our size, with over 7,700 colleagues in office-based and venue-based roles across seven jurisdictions, consistent communication is paramount. Utilising a range of different engagement channels, we notify our colleagues of Group news, as well as business unit-specific updates.

We monitor colleague sentiment during our biannual engagement surveys, but also more informally through forums and listening sessions, network groups, and one-to-ones. We encourage our managers and senior team members to lead by example and foster engagement through open-door policies and personalised communications.

Our employee engagement score serves as our KPI for employee satisfaction and is linked to executive remuneration. Our latest opinion survey, carried out in May 2025 as a check-in following our full survey in November 2024, shows that colleague engagement continues to grow. Our overall engagement score has increased from 8.1 (November 2024) to 8.3 (May 2025), placing us in the top 25% of organisations in the consumer industry (the group we are benchmarked against).

#### What's new?

During the year, we updated our Listening Strategy to make sure that we are able to hear from and respond to all colleagues across the Group. This embodies the 'Glocal' approach, with a global listening strategy established at Group level, but tailored implementation across the business units to reflect local requirements.

This is reflected in our approach to Townhalls; these are a helpful forum for colleagues from across the Group to hear from the Executive Committee, however, business unit meetings are important for more specific updates. As such, Grosvenor has introduced bimonthly Townhalls, while Enracha and Spanish digital now host quarterly and bimonthly stand-ups respectively, and in Mecca, the team have implemented listening sessions which take place in each region and are hosted by the Operations and People Directors.

**Employee engagement score** 

8.3

We utilise a wide range of engag	jement cho	annels to communicate with and hear from colleagues:
Employee opinion survey		Our employee opinion survey ('EOS') is conducted twice a year in all locations; an in-depth survey covering all aspects of working at Rank and a 'Pulse' survey six months later as a check-in from the full survey. Our EOS gauges engagement levels and gathers feedback on all aspects of our colleagues' experience – with the opportunity for colleagues to give open-endec comments.
Feedback from the survey	$\bigcirc$	Feedback is actioned through a 'You Said, We Did' framework. In Spain, feedback is analysed by management and a meeting with the colleagues in each Enracha club is hosted to present the results and answer any questions.
Employee engagement platform	$\bigcirc$	Our employee communications and engagement platform, Connect, is available to all colleagues through an app or via the web, and all content is instantly translatable. It provides timely, relevant and engaging updates, supports a culture of two-way communication, and allows the business to connect with venues' colleagues who are not office-based.
HR data analytics		Our HR data analytics capability has been enhanced through a Power BI dashboard that brings all our people data together with a live feed from the core HR information system. This real-time, Group-wide view of people trends on key metrics (such as colleague performance and attrition) supports strategic planning and helps business managers identify key trends and areas for focus in the business.
SharePoint	$\bigcirc$	The online Rank Resource Hub serves as a hub for all key colleague and business policies and guides. We are aiming to move this onto a knowledge base within Connect during 2025/26.
Townhalls	$\bigcirc$	Townhalls are conducted monthly, led by the Group Chief Executive with presenters from across the different areas of our business, and a Q&A where colleagues are able to ask questions and have the option to submit them anonymously. Colleagues can attend the sessions live on Teams or access the recordings.
Venue management meetings	$\bigcirc$	We hold General Manager team meetings, Regional Operations meetings, and venue listening forums with the Managing Directors of Mecca and Grosvenor venues.
One-to-one meetings and team meetings	$\bigcirc$	We conduct hiring, onboarding, and long-service surveys, as well as exit interviews. Annual performance reviews and mid-year check-ins are also carried out. Line managers are encouraged to hold one-to-one check-ins regularly with their team members to ensure performance feedback is provided and any necessary support is given for development. Team meetings are held within departments; project and performance meetings and business review meetings are also held with a regular cadence to ensure colleagues understand how the business is performing and how they or their teams contribute to the success of Rank.
HR email	$\bigcirc$	We have an HR mailbox through which we can receive and respond to colleagues' questions.

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**66** We have a lot of things that keep us engaged. Mauritius is a multicultural island, and one of the fun things about the office is that we embrace each other's cultures and celebrate all the festivals in the office. Also, we have our STARS awards, and during each Townhall, these are given to colleagues to reward their efforts. It is very nice to feel recognised and loved. You can see you are making a difference and impact in the company.

#### **Lily Patel**

**Customer Champion** 

Last year, we launched Connect, our employee communications and engagement platform, which is accessible via the web or through an app, enabling the business to connect with venues' colleagues who are not office-based.

This year, we have seen how it has been embedded by the business units and used to great effect to engage with their teams. In Mecca, most communications are driven through Connect; 89% of colleagues have engaged with the platform, and of the 1,481 colleagues, 471 are daily users.

Importantly, 82% use Connect via the app, which highlights that we have achieved our objective in bridging the gap to connect with our frontline teams.

Mecca colleagues that have used Connect

#### **Employee forums**



It is important to have a setting through which elected employee representatives from across the Group can ask questions or raise concerns. Twice-annual Group Employee Voice Forums allow colleagues to speak directly with Executive Committee members, while local Ask Me Anything sessions, also held twice a year, are attended by the leadership teams in each location. Themes from each meeting are extracted and we assign responsibility to specific teams to take suggestions forward or implement solutions.

#### **Employee value proposition**



To further embed our employee value proposition, Work. Win. Grow. ('WWG'), we have delivered sessions with teams from across the business who are critical to the engagement of the WWG, including HR operations and payroll. This understanding of what is most important to our colleagues has helped in refining the tone of voice, articulation, and communication of the work they do. We have also held WWG sessions for management and leadership teams using the business unit articulation and themes to reflect the unique focus that engages colleagues.

#### **Board-led engagement**



Our Board visit our venues and our designated Non-Executive Director ('NED') for workforce engagement spearheads biannual confidential virtual employee listening sessions for colleagues from across the Group and reports formally to the Board on key matters discussed in these sessions.

#### **Union engagement**



We have an open line of communication with union bodies and hold regular meetings. In Spain, on an ongoing basis in all the venues, as well as at regional and state level, we have forums for the negotiation of agreements of national or regional application.

#### Whistleblowing and grievance policy

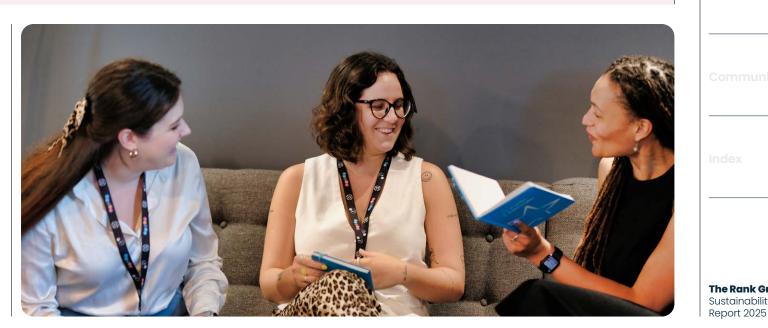


Speaking Up, our whistleblowing platform, is managed by an independent service provider, available 24/7, has multi-lingual communication channels, and ensures anonymity of the individual reporting a concern. We have a Grievance Policy in place and the grievance mechanism is managed by our People and Culture team, providing another avenue for colleagues to raise concerns.

**66** The way Rank engages with people is a real positive. We complete employee surveys twice a year, and following the last one. I can see that the business has implemented new things, such as fostering more engagement with other colleagues in the business and having team outings. There is a feeling that they are listening and taking steps to make sure that everything works for as many people as possible. That is such a great plus from my perspective, just feeling heard.

Ola Rotimi-Toviho

Change Manager



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#### **Case study:**

Our UK digital strategy days

A key theme from our last employee opinion survey was that our UK digital team wanted to see more feedback from the leadership team on the direction of travel for the digital business.

We immediately enacted a programme of in-person strategy and engagement days across various locations, delivered by the UK Digital Managing Director and Group Chief Operating Officer. These roadshows have been a fantastic opportunity to bring to life engagement efforts following 'You Said. We Did'.

In each session, we outlined our strategy and targets over the next five years across our digital brands, how we are looking to achieve these ambitions, and our progress to date. By showing people how they are contributing to the strategy, we are bringing everyone along on our journey. our geographies has been incredibly inspiring. Following the presentations, each team and individual actively contributed to the workshops, leading to fantastic feedback on how we can more effectively implement the strategy across the business.

#### **Andrew Peat**

UK Digital Managing Director



#### Case study:

From Like to Love

This year, we expanded and accelerated our 'From Like to Love' cultural change programme, designed to inspire both our team and customers to move from simply liking what we do at Grosvenor to truly loving it.

Our recent team survey showed record levels of engagement, but we are committed to going further – helping our people feel even more fulfilled at work, supporting their growth, and empowering them to bring their passion to every customer interaction. When our team love what they do, this energy translates into outstanding experiences for our customers and stronger business performance.

Over the past year, we delivered 22 two-day Leading Like to Love programmes, with 631 leaders participating. We recruited and trained 128 passionate Game Changers, our cultural champions chosen for their commitment to driving positive change for both team members and customers.

We held seven, two-day Game Changer workshops across the country, equipping them with facilitation skills, storytelling techniques, and the first nine training modules to share with their teams. Additionally, we hosted two Game Changer Roadshows where we introduced to them the Grosvenor Wheel, our revised roadmap for deepening our culture and supporting our commercial ambitions.

Looking ahead, we have ambitious plans to embed the From Like to Love Wheel throughout the business. Our Game Changers will be instrumental in bringing this to life. We will also launch a new team recognition scheme, awarding badges to celebrate colleagues who embody our From Like to Love behaviours. With these initiatives, we aim to further enhance our customer experience, strengthen our culture, and continue our journey of From Like to Love.

We can already see the impact from Like to Love; before it was implemented in May 2023, our engagement score was 7.0 for Grosvenor. This has seen a huge jump, with a score of 8.4 in the latest employee opinion survey.



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#### Reward and recognition

Fundamental to our aspiration of being an admired employer is providing an attractive working environment where colleagues are rewarded and recognised for their contributions.

In addition to competitive and fair remuneration, our benefits package is designed to support colleagues' wellbeing.

#### What's new?

To improve the process around our STARS awards for our venues, we have now enabled nominations to be made through our recognition platform, Full House. If a colleague wins an award, they will automatically receive points on the platform (which can be redeemed with a wide range of online brands). Everyone has sight of the nominations, which has increased awareness; we have seen a significant increase in the number of nominations, with an average of 3,000 being submitted each quarter.

At our Mauritius office, managers have been allocated a budget to enable them to celebrate successes as a team. This gives the managers more ownership of the recognition approach and directly shows their teams that their hard work is valued.

Our business areas and teams celebrate success in many ways from individual recognition, to team building events, colleague bingo nights, or poker evenings. Connect enables teams and colleagues to be instantly recognised, and we see daily posts of pictures, shout-outs, successes, and events, celebrating the great work our teams do across Rank.



Employee awards	$\bigcirc$	Our awards programme, STARS (Service, Teamwork, Ambition, Responsibility, and Solutions), recognises individuals or teams nominated by their colleagues for exemplifying Rank's values in their work. The awards are presented at our global Townhalls for both office and field-based colleagues. Following the Group quarterly STARS awards, finalists are put forward for local STARS awards. Additionally, STARS awards are held annually for our venues' teams.
Recognition platform		Our recognition platform, Full House, enables peer-to-peer recognition through a transparent and fair process that reinforces our culture of peer-to-peer, non-monetary recognition. Colleagues can redeem points they are awarded for items on the built-in discount platform, which features high street shops and online brands. We are currently working to roll out Full House across all our international locations.
Employee Assistance Programme ('EAP')	$\bigcirc$	We have reviewed the performance of our EAP providers globally, to ensure colleagues in each UK and international location can access the support they need (e.g. awareness of options for affordable quality medical care through our medical plans, wellbeing support, and financial advice).
Annual bonus plans		Following on from shareholder approval to a revised Remuneration Policy, we undertook a review of the management bonus plans to ensure colleagues – especially those in cash-generative roles – are rewarded appropriately for their contribution to business performance. The extensive communication and engagement of our colleagues with the 2024/25 bonus programme has contributed positively to the continued improvement in the Group's financial results and progress on our ESG and Safer Gambling ambitions.
Annual pay review		Our annual pay review was delivered in April 2025 with the successful implementation of the compensation software capability of our new HR information system, Dayforce, and integration of data from our new global provider of market pay benchmark information, Willis Towers Watson. The new system provided managers and supporting HR teams with a secure and effective process to review salaries for all eligible colleagues and ensure compliance with the revised minimum living wage in the UK (6.7% increase). Formal minimum wage checks are conducted and built into our payroll processing, and they are regularly monitored. Union pay negotiations were conducted across all relevant sites.
Pension plans	$\bigcirc$	Company pension arrangements have been reviewed in all our locations to maintain our competitive position and provide an appropriate and affordable opportunity for colleagues to build towards their retirement. As a result of the review, during 2025/26, we intend to consolidate our UK pensions provision with one provider, implement a pensions savings opportunity for our colleagues in Gibraltar, and launch a new pension savings plan for colleagues in South Africa.

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Each office benefits from a dedicated Social and Wellbeing Squad, responsible for organising activities and initiatives for their colleagues. For example, in our Malta office, we provide activities such as yoga and meditation, organise social and sports events, and offer complimentary breakfasts and fresh fruit. Such initiatives are tailored to the specific needs and preferences of our colleagues in each location.

Our UK Employee Assistance Programme ('EAP'), 'Be Supported', is provided by AXA Health and includes a mobile app designed to facilitate the development of positive wellbeing habits in daily life. This provides colleagues with readily accessible resources and support. We also provide webinar content from PepTalk, covering a wide range of subjects, including mental health and wellbeing.

The Love to Learn digital learning platform supports colleagues and managers with a broad range of learning, support, and education tools. It also provides resources to support, drive awareness of, and educate our colleagues on many topics including mental health and wellbeing.

We operate a Mental Health First Aider ('MHFA') training programme, equipping colleagues with the skills and knowledge to provide initial support to those experiencing mental health challenges. We are now looking to build on this by moving to manager training in mental health, to place greater focus on proactive support and early intervention.

We continue to invest in back-of-house colleague areas across our Mecca and Grosvenor venues as part of our refurbishment programme. In 2024, we also gave our Sheffield office a makeover and introduced a new relaxation room.

In 2025/26, we are planning to relocate our Mauritius office to a new space that better accommodates the growing team there. This ongoing programme of work ensures colleagues have access to a good standard of rest and learning spaces, contributing to their overall wellbeing.

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# **Environment**

Aim: Reach net zero emissions by 2050

How we measure progress:

Reduction in absolute carbon emissions tCO,e

5,520\*



We recognise our responsibility to reducing our environmental impact and have set a Group-wide target to reach net zero emissions by 2050.

We developed our Net Zero Pathway to show a clear roadmap to achieving this ambition.

The double materiality assessment highlighted the financial materiality of 'failure to meet internal or external stakeholder climate-related expectations'. To demonstrate the steps we have taken to meet stakeholder expectations, this report includes our disclosure on the recommendations of the Task Force on Climate-related Financial Disclosures ('TCFD'), as well as the steps we have taken so far on our Net Zero Pathway. We continue to listen to our stakeholders, including engaging them through our double materiality assessment.

We continue to progress on our journey to net zero, addressing the impact of 'the release of GHG emissions to the atmosphere as a result of Group's operations and across the entire value chain' through reductions initiatives across our portfolio. This year, we were pleased to exceed our target for reduction in total carbon emissions, showing the impact of the steps we have taken on the Net Zero Pathway.

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<sup>\*</sup> Please note, we previously reported 'Absolute carbon emissions'; moving forward, we will report the reduction in absolute carbon emissions. This represents reductions in our initial boundary of Scope 1, 2, and selected Scope 3 emissions.

# Emissions management and climate change adaptation

As a responsible operator, we are committed to taking the necessary measures to reduce our environmental impact.
We have set a target of reaching net zero emissions for Scope 1, 2, and 3 for the entire Group by 2050.

To meet this ambition, we are developing a Net Zero Pathway focused on assessing and baselining our energy use, engaging and educating our colleagues, and investing in improvements to our estate.

#### Our decarbonisation strategy

In 2023, we announced our commitment to reaching net zero emissions by 2050. We also set an interim target for all operations to reach net zero on Scope 1 and 2 emissions and selected Scope 3 emissions by 2035.

This year, we have made significant progress delivering on our targets through a wide range of workstreams. Critically, we have undertaken a re-evaluation of the Net Zero Pathway as increased data availability, knowledge, and capabilities has brought into scope a wider range of initiatives. The exercise has been enabled by the appointment of a dedicated Environmental Specialist which has allowed us to in-house our emissions reporting and critically assess the feasibility of our decarbonisation pathway.

Notwithstanding the recalibration exercise, we continued to push forward planned initiatives to maintain our momentum. We completed a Scope 3 calculation exercise for all our UK and Spanish operations in 2025, covering all relevant and material categories. This assessment now means that we have calculated the full carbon footprint for all three Scopes of emissions for our largest operating regions.

In conjunction with the assessment and baselining of our energy use, we also identified a significant opportunity to abate our Scope 2 emissions. We have procured Renewable Energy Guarantees of Origin ('REGO') certificates which enabled us to source 66% of our purchased electricity in the UK and Spain from renewable sources in 2024/25. In addition, we are actively investigating self-generation of power and conducted a solar power feasibility study for our UK operations in 2025.

The multi-pronged decarbonisation effort combines these actions with colleague engagement and behavioural programmes, as well as estate and equipment management. As a consequence of these we are seeing positive results.

We are pleased to report a 30.5% reduction in our Scope 1 and 2 emissions across our UK and Spanish businesses. Furthermore, our carbon intensity ratio was 20.74 tCO $_2$ e per £m NGR, an improvement on the previous year.

YOY reduction in Scope 1 and 2 emissions (UK and Spain)

30%

#### Net Zero Pathway What we have achieved **Our short-term** Reduced Scope 1 and 2 emissions by 30.5% Group-wide. **objectives** Entered Power Purchase Agreement ('PPA') in the UK. **Our long-term** Installing low-carbon heating and Continuous improvement and induction cooking solutions across awareness programmes to drive 66% of purchased electricity in UK our venues. energy efficiency and productivity. plans and Spain comes from renewable sources. Invest in on-site renewables, Continuously monitor technology e.g. solar power. developments/innovation for new Offsetting Implement policies and processes potential solutions. to drive low-carbon purchasing Install building control optimisation decisions Any residual emissions and energy management systems. Build partnerships across our supply will be offset using chain and industry to support and nature-based or incentivise decarbonisation. Continuously monitor technology technical solutions. Roll out electric and hybrid vehicles developments/innovation for new across our fleet. low-carbon solutions \*Indicative 2024 2025 2035 2050

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commitments marked the beginning, but this year we've refocused on our Net Zero Pathway development. By prioritising availability of Group-wide data, we are expanding our knowledge and improving our information quality, which will enable us to identify the most appropriate actions and necessary investments required for this journey towards our goals.

#### **Paul Murgett**

**Environmental Specialist** 





#### How do we manage our Net Zero Pathway?

In order to reach our stated goals, we have a robust governance structure in place to guide the business on its Net Zero Pathway. Our Chief Executive has overarching responsibility for our Net Zero Pathway, and the Board maintains oversight for the progress made through the ESG & Safer Gambling Committee.

The Net Zero Working Group ('NZWG') is responsible for operationalising our Net Zero Pathway. The NZWG is chaired by the Environmental Specialist.

All decarbonisation initiatives across the UK business are managed by the NZWG, but it is also kept appraised of all initiatives in the Spanish locations. The NZWG comprises key individuals from across the Group, including the heads of the property and procurement teams, as well as the lead for the decarbonisation initiatives in Spain. This year, our Environmental Specialist was initiated into the Committee and has chaired the group, providing valuable technical insight during the meetings.

Our external consultants in the UK and Spain provide support to the business on gathering energy data, carbon reporting, and reduction initiatives.

This year, we published our Group-wide Environmental Policy which commits to conducting business in an environmentally conscious and responsible manner. The policy is informed by the Paris Agreement, as well as the TCFD. We expect compliance from all Rank employees, third parties, contractors, subcontractors, suppliers, and anyone else employed directly or indirectly by the Group.

The policy also codifies our interim and 2050 net zero targets, while also bringing broader focus on resource management. Our CEO has ultimate responsibility for ensuring this policy is upheld while the ESG team ensures its adherence.

## What have we done to progress on our Net Zero Pathway?

#### Assessing consumption

We continually monitor facility-specific energy usage data at source using smart-sensing devices called PRISM. These are installed at our 39 highest-energy consuming sites in the UK. The devices capture data from every asset that is plugged in at these venues, from each individual gaming machine through to the heating, ventilation, and air conditioning ('HVAC'). This information is assessed alongside the metered gas data. Together, this provides a holistic picture of energy usage at each venue.

The information is available through the Mindsett energy usage platform, accessible either online or through the app. The Mindsett platform enables us to interrogate energy usage across different parameters, such as which equipment is most energy-intensive and whether devices are not being switched off overnight. By gaining a detailed understanding of energy usage in our venues, we can identify where behavioural change can be encouraged to reduce energy consumption. We can then apply these learnings across the entire Group.

A key function of this technology is in enabling predictive maintenance. By continually monitoring the operation of equipment, the platform can distinguish between assets, even if they are the same make and model. Each asset, whether that be a fridge or a PC, has its own data profile, and using this performance data we are able to predict potential faults. This allows the business to pivot from reactive maintenance to preventative, which in turn will mean more efficient energy usage and greater uptime of operational and revenue producing assets.

UK and Spanish venues with smart-sensing technology installed

39

Assets' energy use being monitored in real time

**11,249** 

Categories of Scope 3 we are gathering data for

10

Net zero audits completed

8

#### Case study:

Energy use monitoring in action with General Manager (Mecca Leeds Crossgates) Andy Pickard

Use of Mindsett allows me and my team to have the relevant and most up-to-date energy use data within our venue. We are using this data to implement efficiencies in our operations without impacting the customer proposition.

We can drill down into the data, looking at individual pieces of equipment and assessing if we are running these efficiently. We look for energy hotspots where we are using energy unnecessarily, such as lighting being left on, and have introduced new schedules for equipment to be powered down.

Previously, the temperature control system in the venue required constant adjustment. The introduction of new heating and ventilation controls has produced a more efficient way of keeping the venue at the optimum temperature for the comfort of our patrons.

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#### Scope 1 and 2 emissions

For the rest of our UK portfolio and our venues in Spain, we use energy billing to gauge consumption in each venue. Together with the asset level data collected using the PRISM technology in the UK, we are now able to build a more granular picture of our Scope 1 and 2 emissions.

Similarly in Spain, gathering our energy consumption data has enabled closer examination of our energy use, and we are continuing to leverage it to develop an Enracha-specific decarbonisation plan.

#### Scope 3 assessment

Scope 3 emissions are the largest and most complex area of most companies' carbon footprints. Gathering data on our Scope 3 sources is therefore critical to our long-term objectives. We completed a Scope 3 assessment of the UK business this year, with support from our carbon consultants.

A workshop with representatives from across the Group determined which of the 15 categories of Scope 3 were relevant to the Group and its value chain. This means we have now calculated our full Scope 3 carbon footprint for all categories considered relevant and material to Rank's UK and Spanish operations. The 'Scope 3 emissions by category' chart below shows the Scope 3 categories which were assessed.

Through this assessment, we have begun preliminary engagements to sensitise our key value chain partners to our increasing expectations around their carbon footprints.

We provided our key suppliers with a survey to start to understand their net zero ambitions, any existing emissionsreduction strategies, and data to address certain Scope 3 areas for us. The Group will support the suppliers on this journey and intends to communicate the outcomes of the engagement in the next reporting cycle.

We have included our commitments to this in our new Supplier Code of Conduct publicly accessible on the Group website. We will be focusing on our largest suppliers based on spend for this initial assessment.

In Spain, as well as completing Scope 1 and 2 emissions baselining, we continued to calculate our Scope 3 emissions for our nine venues and central office following an initial assessment last year.

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# Scope 3 emissions by category

**Total Scope 3 emissions** 

121,108 tCO<sub>2</sub>e

48.4%

Purchased goods and services

23.8%

Capital goods

transportation and distribution 6.3%

11.7%

Upstream

Employee commuting Downstream leased assets

0.1%

Use of sold

products

0.4%

End-of-life treatment of sold goods

2.3%

Fuel end energy-

4.4%

related activities

Business

2.5%

0.1%

Waste & water in operations



#### Net zero audits of venues

To ensure we have a holistic understanding of our emissions profile, we conduct net zero audits of our venues. Through the data captured, we identified 19 venues with the greatest opportunity for improvement. Subsequent surveys were administered to review energy efficiency, as well as assess the opportunities for renewable energy.

The findings from the audit and the survey have been incorporated into our re-evaluation and we are considering the most effective means to reduce energy use and improve efficiency.

#### Investing in improvements

Through assessment of the collected data, as well as our understanding of operations across the portfolio, we have kickstarted a host of initiatives which will reduce emissions in our UK estate.

This year we implemented new building management systems to improve efficiency in energy consumption. By replacing the previous system in six venues, we have achieved a more integrated control system that can monitor additional electrical systems with wider coverage across the building spaces. As a result we have already seen an average of 7.7% electricity spend reduction. We expect this programme to continue contributing to annual cost savings as a result of the planned upgrades in other venues later in the year.

Having entered into a Power Purchase Agreement ('PPA') for 2MW of baseload electricity (24 hours/day) in 2023, and purchased a REGO certificate, all purchased electricity in the UK and Spain is now sourced from renewable sources. The electricity supply at some of our venues is managed by landlords who continue to source from the grid. We have therefore begun engaging with landlords to encourage a shift towards our approach.

Going a step further, we also commenced an approach to assess our options for self-generation of power this year, and an external consultant was commissioned to carry out a feasibility study assessing the viability of solar energy as an alternative power source for our UK operations.

#### Understanding our approach

Tackling our Scope 2 emissions forms a key part of our Net Zero Pathway, and we took action this year to align our power supply distribution to match our ambition. The chart showcases the progress made by the Group this year from switching to renewable sources, while also highlighting the areas for improvement.

#### Best

Electricity consumption is sourced from renewable energy. This includes power from our PPA.

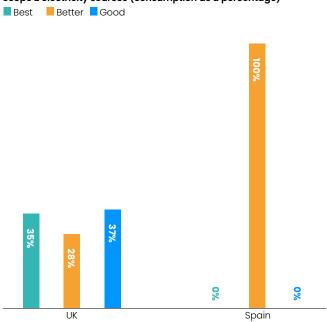
#### Better

Rank has purchased a REGO certificate, enabling us to confidently select renewable energy sources to meet our power requirements.

#### Good

In some locations, we are unable to purchase the necessary renewable energy certificates, and so rely entirely on the grid for power supply, some of which have unverified green electricity tariffs.





We commissioned a review of all our UK venues to assess their potential for solar generation, with both the cost and ease of implementation from a facilities management perspective being considered. Each site was rated with equal scoring for a comprehensive set of factors including roof suitability, annual electricity consumption, maximum potential solar power generation, and speed and ease of implementation

Using this information, they were classified into three tiers of potential to implement solar power.

- 1. Sites with good potential for solar implementation.
- 2. Sites with potential for solar after a more detailed review and some more investment.
- 3. Sites which currently do not have potential for solar.

41 sites were identified as having good potential for solar implementation and 13 of these were subsequently assessed in person to verify the assessment results. A further 29 sites present an opportunity for solar power implementation albeit requiring additional optimisation prior to implementation.

In addition, our energy consumption data revealed that gasbased heating systems form our biggest area of impact in terms of emissions. We are working with our facilities management provider and external experts to understand how we can transition away from fossil fuel-based heating systems in our venues.

#### **Engaging colleagues**

Assets are not the only element of our Net Zero Pathway; our people are also essential in delivering our plans. Behavioural change will be critical in reducing our carbon footprint and therefore, engaging and educating our colleagues on what we are trying to achieve and how to reduce energy consumption is vital.

Our cultural and behavioural strategy has multiple touchpoints for our colleagues to engage with the Net Zero Pathway. To drive our environmental initiatives across all UK venues, we have implemented a colleague engagement programme. We have appointed Rank Planet Champions ('RPCs') at every site to support General Managers ('GMs') in achieving energy consumption reductions, while the Mindsett app provides readily accessible real-time monitoring with automated reminders when equipment remains switched on.

Our Rank Planet Hub serves as a central intranet resource offering energy-saving tips, pathway progress updates, and initiative announcements, and annual surveys are conducted to understand employee priorities. The results of the surveys are then shared with RPCs. Additionally, we provide regular updates on our environmental progress through social media channels, and a quarterly newsletter highlighting different aspects of our sustainability initiatives.

#### What are our next steps?

Having established emissions baselines across all three Scopes, and across our largest operating regions, the UK and Spain, we are scrutinising the data to help evaluate energy usage and aim to target our biggest emission hotspots in the coming year. In particular, we recognise the significant impact of heating systems on our Scope 1 emissions profile and plan to critically assess potential decarbonisation strategies across our venues.

The completion of the feasibility study for solar power has outlined opportunities for the UK business to advance our intention to self-generate some of our power requirements. The project firmly aligns with our commitment to sustainability, and we will seek to make progress on it in the coming year. Specifically, in 2026, we intend to progress solar installation at selected venues.

We will continue to maintain our focus on colleague initiatives as well as implementing equipment improvements or replacements which will be essential to further realise energy efficiencies. We will be launching a new engagement programme for all our colleagues to promote positive behaviour change and increase knowledge.

Alongside developing a more robust Net Zero Pathway that addresses Scope 1 components, next year we also intend to share progress on reducing our Scope 3 emissions. This includes developing a specific Scope 3 reduction strategy that will supplement the preliminary engagement we commenced this year.

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#### Task Force on Climate-related Financial Disclosures ('TCFD')

The following section outlines our climate-related financial disclosures covering all four pillars and 11 recommended disclosures set out by the Task Force on Climate-related Disclosures ('TCFD'). These are consistent with all of the TCFD recommendations pursuant to Listing Rule 9.8.6 (R) (8). Our disclosures also meet the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022 amended sections 414C, 414CA, and 414CB of the Companies Act 2006 and requirements under UK Climate-related Financial Disclosures ('CFD').

#### Governance

#### **Board oversight**

For effective leadership on climate-related issues, there must be awareness and understanding of these matters from the very top of the organisation. Our Board of Directors are regularly kept apprised of climate-risk considerations, including progress against our net zero targets and ESG KPIs. Specifically, the ESG Steering Group, which assumes executive ownership and accountability for the sustainability strategy, provide updates to the Board; in 2024, this included progress on the Net Zero Pathway, and updates on the legislative landscape for climate reporting.

Our CEO and CFO both have climate-related experience, sitting on the Risk Committee, which reviews climate risk, the ESG Steering Group, and the ESG & Safer Gambling Committee, which approves budgets for ESG-related investment and expenditure. The Board has clear oversight of climaterelated matters through its committees. The ESG & Safer Gambling Committee in particular is responsible for overseeing the Group's approach to climate risk, defining strategies and proposed actions.

The terms of reference for the Committee are available on our website; their responsibilities regarding ESG includes climaterelated matters. As highlighted earlier in this report, the Chair of the ESG & Safer Gambling Committee, Katie McAlister, a Non-Executive Director on Rank's Board of Directors, is responsible for oversight of all ESG matters including climate change.

The ESG & Safer Gambling Committee met four times during the year, with climate-related matters raised at each meeting. The Audit Committee is aware of climate risk accounting considerations and the potential impact of climate change on the business.

#### Assessment of climate risk

The Risk Committee considers current and future climaterelated regulatory requirements and monitors them on an ongoing basis. Currently, climate change, though an emerging risk, is considered a low physical risk to the company across all time horizons. This Group Risk Register is also informed by the risk registers held at business unit level from Mecca, Grosvenor, Enracha, and our digital businesses.

Following the business's first double materiality assessment conducted in the last reporting year, the business maintained its materiality assessment of 'Emissions management and climate change adaptation'. Externally, the release of GHG emissions to the atmosphere as a result of the Group's operations and across the value chain, was identified as having a material impact in the short-term.

Nevertheless, this is mitigated by the continued development of our Net Zero Pathway, the completion of emissions baselining exercises across all scopes of emissions in our biggest operating regions, the transition to renewable energy to meet our power requirements via REGO certificates and the existing PPA, exploring self-generation of solar power, as well as continuing our building management systems upgrade programme. This should reduce the impact materiality of this issue over the medium to long term.

Internally, the climate-related expectations of our stakeholders were identified as having a material impact on the business financially. This is a result of our ongoing financial investment into our Net Zero Pathway to meet the Group's targets. However, this expenditure will reduce the financial materiality of the issue over the medium to long term as we reduce our carbon emissions footprint through the infrastructure, equipment, and environmental management systems we have invested into in the short term.

The business has considered the trade off in the cost of the Net Zero Pathway implementation against meeting stakeholder expectations by reducing our carbon footprint in the long term through decarbonisation.

Further climate-related risks were identified as having potential impact upon the business. However, the assessment concluded that these risks were of insignificant financial materiality over the short, medium, and long term. Please refer to the tables on pages 58 to 59 for a detailed breakdown of the transition and physical climate-related risks that we considered.

#### Climate risk in decision-making

Climate-related issues factor into the Board's decision-making processes. The development of the Net Zero Pathway has implications in terms of major plans of action, business plans and internal strategy, as it is a major workstream in the business which is relying on input from a cross-section of the Group, and meeting the expectations of external stakeholders.

A significant component of the annual budget is the continued investment into our real estate: and during the course of the year this included upgrading our building management systems. We also continued to pursue decarbonising our power supply this year, and purchased a REGO certificate, in addition to the existing PPA which represents 35% of our electricity consumption in the UK based on the year just ended.

Further opportunities for energy-use reduction are being explored and scoped, and this is occurring alongside the maintenance programmes to ensure that equipment is being replaced or upgraded at the most appropriate time.

Climate-related issues will continue to be a matter for Board consideration in reviewing and guiding performance objectives, as sustainability performance is linked to executive remuneration, including the Group's reduction in carbon emissions.

#### Management oversight

The approach taken to managing climate-related risks and opportunities is not static but reflects continuous monitoring and assessment of these issues, their potential impact upon the business, and the Group's impact on the environment.

The responsibility for both establishing the direction and implementation of our approach to climate-related risk and opportunities sits with our Executive and Management Teams. Our Director of ESG reports directly to the CEO and the ESG & Safer Gambling Committee, and has led on the implementation of the Group's ESG strategy since 2021, including TCFD reporting, engaging our carbon consultants, and building the Net Zero Pathway.

This year, we bolstered Group-level management for our environmental data through the appointment of an Environment Specialist who reports directly to our Director of ESG. The function builds in-house expertise to assess and address the Group's environmental impacts comprehensively. It also bolsters the focus on developing and operationalising a feasible decarbonisation strategy.

#### ESG Steering Group ('ESG-SG')

The ESG-SG is composed of members of the Executive Committee including the CEO. The ESG-SG plays a strategic role by setting out the ESG-related objectives for the Group, which includes climate-related matters. The ESG-SG meets as required, and all material matters, including those pertaining to climate, are fed through the ESG-SG and then up to the ESG & Safer Gambling Committee.

#### The ESG Working Group ('ESG-WG')

The ESG-WG is led by our Director of ESG, and attended by our sustainability consultants. The ESG-WG is responsible for operationalising the ESG strategy as set by the ESG-SG.

#### The Net Zero Working Group ('NZWG')

The NZWG, meanwhile, is focused solely on operationalising the Group's Net Zero Pathway, chaired by our newly appointed Environmental Specialist. The NZWG comprises a multidiscipline, cross-functional group of personnel including the Director of ESG, the Purchasing Director, and Director of Property. The NZWG meets quarterly, and updates are shared on progress on all net zero workstreams, with data on energy use being provided by our third-party consultants.

The Managing Director in Spain holds ultimate responsibility for the net zero strategy for our land-based Enracha venues, supported by the Strategy and Transformation Lead in Spain on day-to-day operations. Aligning with the overarching Group Net Zero Pathway, the business is developing a country-specific strategy for our Spanish operations.

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In the UK, the ESG Working Group and Net Zero Working Group are supported by external advisors, specifically relating to our climate-risk reporting and net zero workstreams. The consultants – Consultus, Cloudfm, and Burson Buchanan – each have unique but complementary skillsets. These skillsets satisfy the multitude of stakeholder requirements that drive operational, financial, and commercial success. In Spain, we engage consultants to support on net zero workstreams on an ad hoc basis.

The Group is informed by other corporate advisors. These include broking, legal and accounting professionals, with information delivered via webinars, publications, one-to-one training sessions, and ongoing internal discussions regarding energy utilisation. Considerations from multiple segments of the business feed into our assessment of climate-related risks and opportunities, as these risks can impact the business in many different ways. For the Group's balance sheet, climate-related risk has the potential to impact financial performance and cost base.

#### Governance

#### **Board**

ESG & Safer Gambling Committee

Board Sub-Committee led by Non-Executive Director, Katie McAlister

**Executive Committee** 

trategy

**ESG Steering Group** 

Executive group comprises CEO and members of Executive Committee

#### ESG Working Group

Led by Director of ESG and attended by thirdparty sustainability consultants

#### Net Zero Working Group

Cross-functional group of internal and external personnel, led by our Environmental Specialist Regarding investor relations, it is material in the management of Rank's capital markets profile and awareness of emerging risks and requirements. For our Procurement Team, a key consideration is emissions management within our supply chain driving the decarbonisation of materials used in our venues, and realising efficiencies in portfolio management.

#### Strategy

The NZWG constantly reviews new opportunities to refine our decarbonisation and investment strategy across the UK and Spanish portfolio and adjusts the Net Zero Pathway accordingly. These investments will support the Group's stated ambitions, and the upfront capex should positively impact the long-term opex requirement, with the introduction of more energy efficient and cost-effective solutions. The inclusion of climate assessment criteria into the project approval process for all areas of the business further integrates climate-risk consideration into our operations.

As set out in our Net Zero Pathway (see pages 52 to 55), Rank has committed to climate-related and aligned initiatives over the next ten years within the UK to meet its 2035 and 2050 climate targets. (It is important to note that this will include expenditure that is a matter of course for maintenance, but that will contribute to the reduction of the business's carbon footprint.) The investment made each year is dependent on the initiatives we are able to complete.

As a responsible operator, Rank seeks to engage with industry associations regarding climate change. While there is no publicly stated climate change policy adopted by the Betting & Gaming Council ('BGC'), or the Bingo Association, we convened a working group with the BGC this year to raise our climate ambitions within the industry.

Rank takes into consideration the useful life of the organisation's assets or infrastructure and the fact that climate-related issues often manifest themselves over the medium and longer terms. This year, Rank's accounting team reassessed the climate-related matters that may impact the Group's financial statements. The following table includes assessment of the potential future impacts that could be felt by the business.

Findings of assessment of climate-related matters on Group's financial statements				
Area of assessment	Potential impact			
Intangible assets, property, plant and equipment, leased assets	Climate-related risks may have a substantive financial or strategic impact of the Group's business, affecting the useful lives and residual values of intangible and tangible assets. It could be determined after assessment that useful lives may need to be reduced and depreciation and amortisation accelerated.			
Impairment of assets	Impairment indicators will include any significant changes in the technological, market, economic, or legal environment that negatively impact the Group. Our external consultants provide us with the risk-based cost of capital calculations which take into account climate risk. Increased awareness of the consequences of environmental change is triggering regulatory action, which is affecting stakeholders' perspectives.			
Provisions	As the Group takes action to address the consequences of climate change, these actions may result in the recognition of new liabilities or, where the criteria for recognition are not met, new contingent liabilities may have to be disclosed.			
Fair value measurement	The Group will ensure that fair value measurements appropriately consider the relevant climate-related risk factors. Our external consultants provide us with the risk-based cost of capital calculations which take into account climate risk. Climate change can have a tangible effect on assets and liabilities now and in the future (e.g. rising water levels, changing weather patterns, increased pollution levels etc).			
Summary findings	The Group constantly monitors the latest Government legislation in relation to climate-related matters. As of the year end, there is no legislation in place that will financially impact the Group. Should a change be required, key assumptions used in 'value in use' calculations and 'sensitivity to change' assumptions will be adjusted. Management has assessed that there is no material impact to the financial statements due to climate-related matters.			

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#### Climate-related risks and opportunities

Climate-related risks are not anticipated to have a material financial impact on the business. However, such issues do mean an adjustment in the Group's strategy to accommodate greater recognition of climate risk, as well as how this is assessed, resourced, and communicated to stakeholders.

The Board, Executive, and working groups will continue to monitor all climate-related issues.

#### Transition risks

Transitioning the business to meet the requirements of a lower-carbon economy may entail extensive policy, legal, technology, and market changes to address mitigation and adaptation requirements related to climate change.

Physical Risks			
Risk description	Potential outcomes	Financial impact	
Policy and legislation			
That Rank is not able to respond to increasingly stringent regulation on reporting	Monitoring potential legislative and regulatory changes.	Across the short, medium, and long term we consider this risk to be of insignificant financia	
to the frequency or quality required, resulting in legal and/or reputational issues, which in turn drive compliance costs and potentially impact the cost of capital.	Reporting against the recommendations of the TCFD.	materiality as we are reporting against internationally recognised frameworks, and we are currently developing our disclosure ready to meet new legislative requirements sustainability reporting.	
	Reported to the CDP.		
That nation states may introduce carbon emission levies, placing an additional fee upon energy consumption costs, which may increase Rank's operating costs.	Continue to monitor for potential carbon emissions levies.	We consider this risk to have insignificant financial materiality across the short, medium and long terms, as the development and implementation of our Net Zero Pathway will reduce our emissions.	
Market			
Climate-induced changes to customer	Continue to monitor customer behaviours.		
Climate-induced changes to customer preferences for leisure, such as more players choosing to play online at home, rather than incur possible transportation emissions and	Continue to monitor customer behaviours.  Offer cross-channel platforms for customers.		
Market  Climate-induced changes to customer preferences for leisure, such as more players choosing to play online at home, rather than incur possible transportation emissions and continued utilisation of inefficient spaces.  Reputational		offering means that if customers were increasingly moving online, we could adapt	
Climate-induced changes to customer preferences for leisure, such as more players choosing to play online at home, rather than incur possible transportation emissions and continued utilisation of inefficient spaces.		and therefore, consider its financial materiality insignificant. Furthermore, our cross-channel offering means that if customers were increasingly moving online, we could adapt	

#### Physical Risks

Physical risks resulting from climate change can be event-driven (acute) or due to longer term shifts (chronic) in climate patterns.

Flood risk assessment We once again completed a desktop assessment to review the perceived flood risk of our UK operations (both venue and office locations) and international operations (including all Enracha venues and the offices in Spain, Gibraltar, South Africa, Mauritius, and Malta). This research utilised data from the UK Government, Scottish Environment Protection Agency ('SEPA'), and Natural Resources Wales, as well as online tools such as Aqueduct's Water Risk Atlas, and ThinkHazard!, developed by the World Resources Institute and the World Bank respectively.

Of the 106 venues and offices in the UK, only ten were identified as high risk for urban/surface water, river, and/or coastal flooding. Of the 15 international venues and offices assessed, only two (venues in Spain) were identified as being at high risk of urban/surface water, river and/ or coastal flooding. Currently, we believe there is little to no impact from the physical risk presented in Spain on our financial performance.

All our venues are insured in the event of flooding. While flooding would impact our performance as clubs would have to shut, given the low likelihood of this occurring, we consider this of insignificant financial materiality to the business. This is our current analysis on the physical risks posed by climate change – while the physical risk may change over time, we do not believe financial materiality will.

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#### **Transition Risks**

Risk description	Potential outcomes	Financial impact
Acute		
Extreme weather events as a result of climate change could cause damage to our properties and vehicles which will incur increased capex and insurance costs. Impacts of supply chain disruption from increased severity of extreme weather events may affect opex and capex, or impact revenue if customer demands for online entertainment cannot be met.	Business continuity and crisis management plans in place.	Extreme weather events would impact our performance if a club were shut, and as a result, our cash flows. However, all our venues are insured, and we also consider this to be of low likelihood; it is therefore considered of insignificant financial materiality across the short, medium, and long term.

#### Chronic

Changes in average climate conditions, including rising sea levels, coastal flooding, and increased average temperatures, could increase opex driven by increased use of climate control systems, as well as maintenance and insurance costs.

Continue to monitor flood risk at all Enracha, Grosvenor and Mecca venues.

Clubs are insured in event of a flood.

Flooding would impact our performance and cash flows if a club were shut. However, all our venues are insured, and we also consider this to be of low likelihood; it is therefore considered of insignificant financial materiality across the short, medium, and long term.

#### Flood risk assessment for UK and Spanish venues

UK venues & offices	Surface water	Rivers	Coastal
High risk	5.7%	3.8%	3.8%
Medium risk	5.7%	3.8%	2.8%
International venues & offices	Surface water	Rivers	Coastal
International venues & offices  High risk	Surface water 0.0%	Rivers 6.7%	Coastal

#### Scenario analysis

To evaluate the resiliency of the Group's strategies to climate-related risks and opportunities, we conducted an analysis on two different possible scenarios: the rise in global temperature is limited to less than two degrees, or the global temperature rises by more than two degrees. The risks and opportunities to the Group under each scenario are presented below against short, medium, and long-term time horizons.

#### C2°C scenario

Our less than 2°C scenario assumes that we act responsibly, improve the efficiency of our portfolio by working with our landlords, and reducing our GHG emissions. This may include the introduction of carbon pricing by national Governments. We consider transition risks to pose the greater threat to our business under this scenario, with only a limited and manageable impact on our operations from physical risks. We considered the IEA's Net Zero Scenario in developing this scenario.

#### Risks

#### Short term (< 1 year)

Higher transition risks associated with moving to a low-carbon economy.

Compliance risk if we fail to meet regulatory requirements, including emissions reporting obligations.

Reputational risk with investors, customers, and employees if we do not adequately address climate change.

Increased cost of climate-related levies/increased pricing of greenhouse gas (GHG) emissions.

#### Medium term (1 – 5 years)

Continued transition risks.

Continuing compliance risk if we fail to meet regulatory requirements, including emissions reporting obligations.

Increasing reputational risk with investors, customers, and employees if we do not adequately address climate change.

Increased cost of climate-related levies/increased pricing of GHG emissions.

Changing customer behaviour.

#### Long term (> 5 years)

Less significant increase in physical risks. Continued isolated extreme weather events causing manageable direct business disruptions to office locations, and impacts to suppliers in our moderate supply chain.

Higher summer temperatures and rapid changes in temperature and humidity causing challenges for venue cooling, and increases in energy costs across our venues and offices.

#### **Opportunities**

Define net zero strategy to meet increasing stakeholder expectations.

Potential to develop a zero-emissions online product, or facility that allows customers to offset.

As demand for more energy-efficient infrastructure and equipment increases in the market, so demand will increase, which is likely to reduce costs. This will enable investment that will ultimately reduce energy costs.

Please note: The risk ratings of 'high' and 'medium' used in this table were defined by the sources from which we gathered the flood risk data. See the double materiality section of this report for full details on how Rank has scored the materiality of risks.

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#### >2°C scenario

This scenario assumes global climate policy is less effective and that unabated GHG emissions cause climate change above that envisaged by the Paris Agreement. Under this scenario, informed by the International Energy Agency's (IEA) Sustainable Development Scenario (SDS), we would expect physical risks to become much more apparent in the longer term, outweighing transitional risks.

Following our assessment, we believe that the business is resilient under either scenario. While we consider transition risks to be of greater threat to the business under the <2°C scenario, we believe that our ongoing efforts under our Net Zero Pathway mean we are mitigating risk in this area.

#### Risks

#### Short term (< 1 year)

Slight increase in transition and physical risks in the short term.

Isolated and manageable business disruptions caused by extreme weather events, such as flooding or drought.

Insurance costs rise in step with increase in physical damage to properties.

Ad hoc supply chain interruptions.

#### Medium term (1 - 5 years)

Increasing physical risks due to a failure to adequately transition to a low-carbon economy.

Increase in energy costs as traditional energy sources become more constrained, while underinvestment into cleaner energy fails to bridge energy demand gap.

Flooding at certain high-risk venues due to increased sea level.

#### Long term (> 5 years)

Increased physical risks due to a failure to adequately transition to a low-carbon economy.

Increase in energy costs.

Flooding at certain high-risk venues due to increased sea level.

#### **Opportunities**

Identify higher-risk properties within the portfolio to either invest in or to consider exiting to stave off future reparation and increase in insurance

Engage with supply chain to ensure availability of mission critical supplies.

#### Risk management

Each business unit also manages its own risk register, which feeds into the overarching Group register, therefore enabling a holistic view of risk for the company. The potential size and scope of identified climate-related risks is determined in the same manner as any risk on the risk register. We conduct an analysis which weighs 'Impact' against 'Likelihood'.

Decisions to mitigate, transfer, accept, or control climaterelated risks are made in the same manner as any risk on the risk register. As climate risk was considered not material to the business at present, it is not currently on the risk register. However, the Risks Committee and Board continue to monitor the materiality of climate risk.

The financial materiality of the identified climate-related risks has been assessed as part of the double materiality assessment we undertook. This process was aligned with our risk register to ensure that the methodologies were the same. Subject matter experts input upon the impact and financial materiality of each risk and opportunity, considering all the preventative and mitigating actions in place, and the likelihood and scale of each

Financial materiality was considered against operating profit and classified as insignificant, minor, moderate, major, or severe, and whether that impact was upon cash flows, development, performance, position, cost of capital, or access to finance. Each risk was considered across the short-, mediumand long-term time horizons, which we define as the following: short, <1 year; medium, 1 to 5 years; and long, >5 years (please note: we have updated the time horizons to reflect those which we used in the double materiality assessment, guided by the CSRD). The collated results of the double materiality assessment were presented to the Executive for consideration and approval.

Please see the double materiality assessment report on pages 6 to 7 for a complete understanding of the process. Responsibility for mitigating, transferring, accepting, or controlling climate-related risks sits with the NZWG and its Chair, our Environmental Specialist. The judgements made are related to the ESG Steering Group and ESG & Safer Gambling Committee for oversight and approval.

The NZWG convenes frequently to assess progress against our net zero targets: net zero by 2050, and an interim net zero target for Scope 1, 2, and selected Scope 3 for the Group by 2035. This is in line with national and international targets.

Our real estate portfolio is the most material carbon hotspot within the Scope 1 and 2 value chain. Consequently, this has been designated the primary area of focus for the NZWG. through the application of technology within the top 40 most carbon-intensive sites (which comprise over 50% of the Group's carbon profile). Having collected more than six months' worth of data assessing energy use and efficiency of equipment, we have identified improvement opportunities and commenced a programme of investment into our venues. A programme for building management system upgrades was initiated in six venues this year facilitating more integrated controls, and expanded control coverage across each site.

To further optimise our energy consumption, all UK venues underwent a desktop solar audit to gauge feasibility for solar power generation at each individual site. For more details, see page 55.

In addition to these initiatives, we have undertaken a Scope 3 assessment across the UK business which has ensured a calculation of our full Scope 3 carbon footprint for all categories considered relevant and material to Rank's UK and Spanish operations. This has been followed up with a programme of supplier engagement to understand the emissions profiles and ambitions of our key suppliers.

For more details on the Scope 3 assessment, see page 54.

To align with the Group net zero target, we are developing a specific net zero strategy for the Spanish portfolio, having previously completed an energy assessment of the land-based

While we continue to develop our Net Zero Pathway, we are implementing planned initiatives through three interrelated workstreams: carbon reporting, transformation (PMO and designing investment plan), and cultural and behavioural change (see the Net Zero Pathway section for more details on initiatives completed and commenced to date).

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#### Metrics and targets

We have set two net zero targets in line with our decarbonisation ambitions. We aim to be net zero by 2050 and intend to disclose an SBTi-aligned plan for reaching net zero by 2050, or earlier if possible. To ensure we are progressing in step with our own expectations, as well as those of our stakeholders, we have set an interim net zero target for Scope 1, 2, and selected Scope 3 emissions (transmission and distribution losses, air travel, rail travel, waste, water use, and employee travel) in the Group for 2035.

Our targets are based around clear workstreams for decarbonisation of operations, as part of our Net Zero Pathway. Foremost, building on an extensive energy assessment in venues in the UK, we have undertaken a raft of initiatives that include obtaining a REGO certificate and continuing our PPA supply which together ensure that all our purchased electricity in the UK and Spain comes from renewable sources; exploring the possibility of self-generation by conducting a solar power feasibility study across the entire UK; completing Scope 3 assessments for our UK business, addressing all its constituent categories; and a programme for building management system upgrades amongst various other energy reduction measures including colleague engagement initiatives, the implementation of which has already begun.

By integrating climate considerations into the approval process for projects, we are using GHG emissions and carbon intensity metrics to support the assessment and qualification of investments. We have also completed an energy assessment at all our venues in Spain, and are in the process of developing a decarbonisation plan for the Spanish portfolio.

The Scope 3 emissions assessment for our UK business means that we now have a complete assessment for all Scopes, in Spain and the UK, which will together inform the initiatives under our Net Zero Pathway. For more details on our Net Zero Pathway, please see pages 52 to 55.

The metrics currently used by Rank to assess climate-related risks and opportunities in line with its strategy and risk management process are Scope 1 and 2 emissions and all Scope 3 impacts on an absolute basis. These are published as part of the Group's obligations to report in line with Streamlined Energy & Carbon Reporting ('SECR'). For purposes of ongoing comparison, it is required to express the GHG emissions using a carbon intensity metric. The intensity metric chosen is £m NGR. Rank's NGR for 2024/25 was £795.3m, with a carbon intensity ratio of 20.74 tCO<sub>2</sub>e per £m NGR (for 2023/24 it was 30.1).

This year, we have used absolute carbon emissions as the key performance indicator for our environmental performance, and this is linked to executive remuneration.

#### **SECR report**

The Rank Group Plc is a quoted company and therefore required to report its GHG emissions through annual reports. This report has been prepared to support Rank's compliance with the Directors' Report under Part 15 of the Companies Act 2006 (Strategic Report and Directors' Report), requiring the disclosure of energy use and GHG emissions.

#### Scope boundaries & reporting methodology

Figures refer to the 52 weeks ended 30 June 2025. Please refer to Rank's Basis of Reporting available at [insert link] for full scope, boundary, and methodology disclosure for our greenhouse gas reporting. For our disclosure we have applied the methodology per the Greenhouse Gas Protocol.

#### **Energy efficiency actions**

Rank have implemented various projects to improve their energy efficiencies which include the installation of new, more energy-efficient chiller units, boilers, and air con units at several different sites. They also have measures being implemented in other sites which are still a work in progress. Some examples include:

- New, more energy-efficient boilers being installed at Mecca Leeds Crossgates and Mecca Croydon.
- Air conditioning split systems being replaced at Grosvenor Casino Reading South.
- The air-cooled water chillers have been replaced at Mecca Bingo Croydon and are more energy efficient.
- Building management controls updated to allow expanded control coverage at Grosvenor casinos in Huddersfield,
   Didsbury, Newcastle, Manchester Bury New Road, Walsall,
   Portsmouth, and Stockton plus Mecca Leeds Crossgate.

#### Independent assurance

Rank engaged ERM Certification and Verification Services, Ltd ('ERM CVS') to provide independent limited assurance of selected greenhouse gas emissions for the 2024/25 reporting period. For detailed information on the scope, activities, and conclusions of the assurance, please refer to the ERM CVS Assurance Report on Rank's corporate website.

#### Streamlined Energy & Carbon Reporting ('SECR')

Overall group position kWh					
<b>Emission source</b>					
Energy type	2024/25 kWh	2023/24 kWh	% of 2023/2024 total	Change +/-	
Gas	48,151,345	56,223,131	49.5%	-14.4%	
Electricity	54,657,202	54,378,618	47.8%	+0.5%	
Company transport	1,558,432	3,053,669*	2.7%	-49.0%	

104,366,979

IJK	aroup	position	kWh
OIL	group	position	L AAII

Total

Emission source					
Energy type	2024/25 kWh	2023/24 kWh	% of 2023/2024 total	Change +/-	
Gas	47,591,926	55,675,893	51.0%	-14.5%	
Electricity	50,109,665	50,355,849	46.2%	-0.5%	
Company travel	1,558,432	3,053,669*	2.8%	-49.0%	
Total	99,260,024	109,085,412	100.0%	-9.0%	

113,655,418

#### Spain group position kWh

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Emission source				
Energy type	2024/25 kWh	2023/24 kWh	% of 2023/2024 total	Change +/-
Gas	559,418	547,238	12.0%	2.2%
Electricity	4,072,331	4,022,769	88.0%	1.2%
Total	4,631,749	4,570,007	100.0%	1.4%

#### Other International position kWh

Emission source				
Energy type	2024/25 kWh	2023/24 kWh	% of 2023/2024 total	Change +/-
Electricity	475,206	-	0.0%	
Total	475,206	-	0.0%	

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	2024/25		2023/24	
Energy type	tCO,e		tCO,e	
Gas	8,808	6.5%	10,290	46.7%
Company transport	147	0.1%	378	1.7%
F-gases	 581	0.4%	620	2.8%
Scope I total †	9,537	7.1%	11,288	51.3%
Scope 2 (location-based) total †	11,402		11,086	
Scope 2 (market-based) total †	4,137	3.1%	8,380	38.1%
Category 1 – Purchased goods & services	58,613	43.5%		0.0%
Category 2 – Capital goods	28,867	21.4%		0.0%
Transmission & Distribution Losses	1,033	0.8%	974	4.4%
Other Fuel & energy-related activities	4,337	3.2%		0.0%
Category 3 – Fuel & energy-related activities	5,370	4.0%	974	0.7%
Category 4 – Upstream transportation & distribution	14,194	10.5%		0.0%
Category 5 - Waste & water in operations	81	0.1%	93*	0.1%
Air travel	1,062	0.8%	892	4.1%
Rail travel	79	0.1%	47	0.2%
Private cars	568	0.4%	343	1.6%
Other business travel	1,283	1.0%		0.0%
Category 6 – Business travel	2,993	2.2%	1,283	0.9%
Category 7 – Employee commuting	7,610	5.6%	-	0.0%
Category 11 – Use of sold products	119	0.1%	<del></del>	0.0%
Category 12 – End-of-life treatment of sold goods	438	0.3%		0.0%
Category 13 – Downstream leased assets	2,822	2.1%		0.0%
Scope 3 total † (Transmission and distribution losses, waste and water in operations, air travel, rail travel, and private cars)	2,824			
Scope 3 total	121,108	89.9%	2,350**	10.7%
Total	134,782	<u> </u>	22,018	

Energy type	UK	Spain	Other International	Total
Gas	8,706	102	-	8,808
Company transport	147	-	-	147
F-gases	513	68	-	581
Scope 1 total †	9,366	171	-	9,537
Scope 2 (location-based) †	10,367	738	298	11,402
Scope 2 (market-based) total †	3,839	-	298	4,137
Category 1 – Purchased goods & services	55,689	2,924	-	58,613
Category 2 – Capital goods	27,541	1,325	_	28,867
Transmission & distribution losses	917	79	37	1,033
Other fuel & energy-related activities	4,092	222	24	4,338
Category 3 – Fuel & energy-related activities	5,009	301	61	5,371
Category 4 – Upstream transportation & distribution	14,149	45		14,194
Category 5 - Waste & water in operations	74	5	2	81
Air travel	1,032	30		1,062
Rail travel	65	15		79
Employee transport	568	_		568
Other Business travel	1,261	22	_	1,283
Category 6 – Business travel	2,927	66	_	2,993
Category 7 - Employee commuting	6,999	612	_	7,610
Category 11 – Use of sold products	118	1	_	119
Category 12 – End-of-life treatment of sold goods	365	73		438
Category 13 – Downstream leased assets	2,822			2,822
Scope 3 total † (Transmission and distribution osses, waste and water in operations, air travel, rail Travel, and private cars)	2,657	128	39	2,824
Scope 3 total	115,693	5,352	63	121,108
Total	128,899	5,523	361	134,782

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knowledge, and we will provide an update in due course.

Pillar	Recommendation	Location	Consistency statement 2024/25	Intention
Governance	a. Describe the Board's oversight of climate- related risks and opportunities.	Pages 56 to 57	Consistent	Continue to keep the Board informed of climate-related risks.
	b. Describe management's role in assessing and managing climate-related risks and opportunities.	Pages 56 to 57	Consistent	Continue to communicate the progress of the net zero strategy development up to the Board.
Strategy	a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	Pages 57 to 60	Consistent	Continue to monitor relevant climate-related risks and opportunities over our defined time horizons.
	b. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning.	Pages 57 to 60	Consistent	Continue to make informed decisions in investing in decarbonisation initiatives.
	c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Pages 59 to 60	Consistent	Continue to monitor the resilience of our strategy under climate-related scenarios.
Risk management	a. Describe the organisation's processes for identifying and assessing climate-related risks.	Page 60	Consistent	Continue to monitor the financial materiality of climate-related risks through our double materiality process.
	b. Describe the organisation's processes for managing climate-related risks.	Page 60	Consistent	Continue to progress on our Net Zero Pathway.
	c. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	Page 60	Consistent	To review our double materiality process which is informed by the risk register.
Metrics and targets	a. Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	Page 61	Consistent	Continue to disclose positive economic and environmental impact metrics.  We have included the YOY reduction in Scope 1 and 2 emissions on a Group-wide basis.
	b. Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas emissions and the related risks.	Page 62	Consistent	Continue to disclose Scope 1, 2, and 3 emissions.
	c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	Pages 62 to 63	Consistent	Continue to progress the decarbonisation efforts that will enable us to have an SBTi-aligned net zero plan in the coming years. The process for alignment is up to two years, based on current market knowledge and we will provide an

#### Progress towards our 2035 Net Zero Target

	FY25	FY24	
Energy Type	tCO <sub>2</sub> e	tCO <sub>2</sub> e	% Change
Gas	8,808	10,290	-14%
Company Transport	147	378	-61%
F-Gases	581	620	-6%
Electricity (market-based)*	4,137	8,380	-51%
Transmission & Distribution Losses	1,033	974	6%
Waste Operations*	43	58	-26%
Water Use	38	35	8%
Air Travel	1,062	892	19%
Rail Travel	79	47	67%
Private Cars	568	343	66%
Total	16,498	22,018	-25%

#### † - Assured figures

<sup>\*</sup> Restatement summary – This year we conducted a review of our prior year data, we reviewed our emissions data, corrected errors, and refined our methodology to enhance reporting accuracy and consistency. As per our recalculation policy changes exceeding 5% were restated, impacting Scope 2 electricity marketbased and Scope 3 waste due to data errors and omitted data

<sup>\*\*</sup> FY24 Scope 3 only calculated for selected categories



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This year, we launched standalone, Group-wide policies on water and waste management. The policies codify our approach to responsibly managing these resources, and limiting its waste where possible.

We want to increase the percentage of waste we recycle across the Group. Our waste management provider in the UK, Biffa, assessed recycling rates in our UK venues and provided training to employees on waste segregation. In response to the UK Government's legislation 'Simpler Recycling', all businesses and workplaces were required to default to a four-container waste segregation procedure in 2025. We believe the legislation will make recycling an easier task for customers and colleagues and have ensured compliance by implementing the procedure in all venues and offices in the UK.

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# Communities

**Aim: Support local communities** through impactful partnerships and opportunities

How we measure progress:

Total charitable funds raised



#### Beyond entertaining people, we recognise that we play a pivotal role in the communities in which we operate.

Our venues often serve as a social hub, with our Mecca venues. in particular, being a key place for social interaction, and we also provide job opportunities in the communities in which we operate. As many of our colleagues live in the locality, they are keen to support community causes and charities. Groupwide, our partnership with Carers Trust enables us to support a charity and its valuable work in recognising and helping unpaid

Our double materiality assessment illustrated the importance of 'creating positive outcomes for local communities through charitable initiatives and offering local employment opportunities'. This Communities section addresses the positive social impact we have had and the efforts of our colleagues across the Group.

#### In this section:

66	Actively recruiting from local communities
67	Partnership with Carers Trust
71	Enabling our colleagues to give back



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**Communities** 



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We continue to work with the Department for Work and Pensions ('DWP'), affiliated schemes, and other bodies that specialise in ensuring there are work opportunities for all in local communities.

We take an agile approach to how we advertise our roles and the content within them, informed by market-leading external resources and data. Alongside improved adverts, we are working with the one of the largest job boards in the world, to ensure our adverts and roles are seen by as many suitable people as possible.

A certain amount of spend is dedicated to apprenticeships. While we offer these internally to create opportunities for our employees to upskill and progress in their careers, we also put aside 20% of our levy to support talent development in the wider hospitality sector. Charities and small businesses in our industry can apply to Rank to receive a portion of the funding to use for training their own employees.

We have also focused on the delivery of programmes targeted at work-based qualifications, early careers, and returners to the workplace.

In addition to offering employment opportunities, we actively support our local communities by providing learning experiences for individuals exploring career paths. Last summer, we offered a placement within the finance team to a young person seeking valuable work experience.

During 2024/25, we offered a variety of work experience opportunities, including in the finance and the procurement teams.

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# Partnership with Carers Trust

Back in 2014, we entered into a partnership with Carers Trust, forging a UK-wide commitment to support unpaid carers. The charity is on the frontline, tirelessly working to enhance services, bolster support, and secure the recognition these selfless individuals so rightly deserve.

Across every venue and office, our Carers Champions – passionate individuals and teams – are the heart of our fundraising efforts. Our champions are the people that spark excitement for upcoming events, rally colleagues to get involved, and ensure every new team member understands the profound impact of Carers Trust and our unwavering support.

#### **Rank Cares Grants**

Through the Rank Cares Grants programme, we have continued to provide financial assistance to carers. These grants are offered under three distinct categories:

- Carers Essentials Fund: This fund contributes towards the cost of essential household appliances, such as washing machines, cookers, fridge freezers, and beds.
- Carers Take Time Out Fund: This fund provides carers with opportunities to take respite from their caring responsibilities, allowing them to relax, pursue personal interests, and rejuvenate.
- Carers Skills Fund: This fund enables carers to acquire new skills, either to assist them in their caring duties or to facilitate their return to employment.

Funding applications are submitted to one of our 135 network partners across the UK and are subsequently reviewed by a dedicated Grants Panel. We invite colleagues from across Rank to participate on these panels, thereby fostering a deeper understanding and appreciation of the impact of our fundraising efforts and the importance of supporting carers.

Funds raised for Carers Trust since 2014

£4,200,788

Carers supported since 2014

14,848

of the Carers Trust Grants Panel; it provided me with an opportunity to better understand how the funds raised are used to support people across the UK. It was very humbling to see what was being requested, as most were basic items such as a washing machine, cooker, or a day's respite - things that many of us take for granted. It demonstrated to me how important it is that we continue to raise money for this great charity.

#### **Clare Lord**

People Director, Mecca

for me. As a single parent carer, who can't work due to caring for my son, I have very little income. So just getting by in day-to-day life is a struggle. When moving house, there were no floors down or paint on the walls, it was a total blank canvas. This £300 has contributed greatly to flooring my living room. I cannot thank you enough! It's so appreciated, I could cry at the generosity!

Carer in Scotland who received a grant

#### Corporate Partnerships Development Board

To further strengthen current partnerships and to connect to new businesses and new advocates, Carers Trust is introducing a Corporate Partnerships Development Board.

The board brings together individuals from across its corporate partners, whose skills, experience, and networks will help raise vital funds for Carers Trust by strengthening its corporate partnerships pipeline and helping to identify new companies for the charity to work with. To support this initiative, Mecca's Managing Director, Andy Crump, has joined the board.

66 We're excited to share that Andy Crump has joined Carers Trust's newly established Corporate Partnerships Development Board. We're really pleased to have Andy on board and look forward to the contributions he'll bring.

#### Jen Russell

Stewardship Manager at Carers Trust



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#### Case study:

Carers' stories

Jim is 60 and cares for his father who has dementia and Parkinson's. The caring role is very demanding and Jim is responsible for all aspects of running the household, taking his father to appointments, assisting with medication, and providing emotional support.

Jim's Carer Support Worker states that 'Jim is the primary caregiver and devotes his time to ensuring that his dad's needs are met. Since giving up work to be a full-time carer, Jim does not have much social interaction'. Jim's washing machine is leaking and cannot be repaired. He lives on a very limited budget and cannot afford to replace the machine.

This is causing him a lot of additional stress as his father has continence issues meaning that Jim needs to wash clothes and sheets on a very regular basis. Jim has been awarded a grant of  $\pounds 299$  towards the cost of a new washing machine which will help to ease some of the pressure he is under.

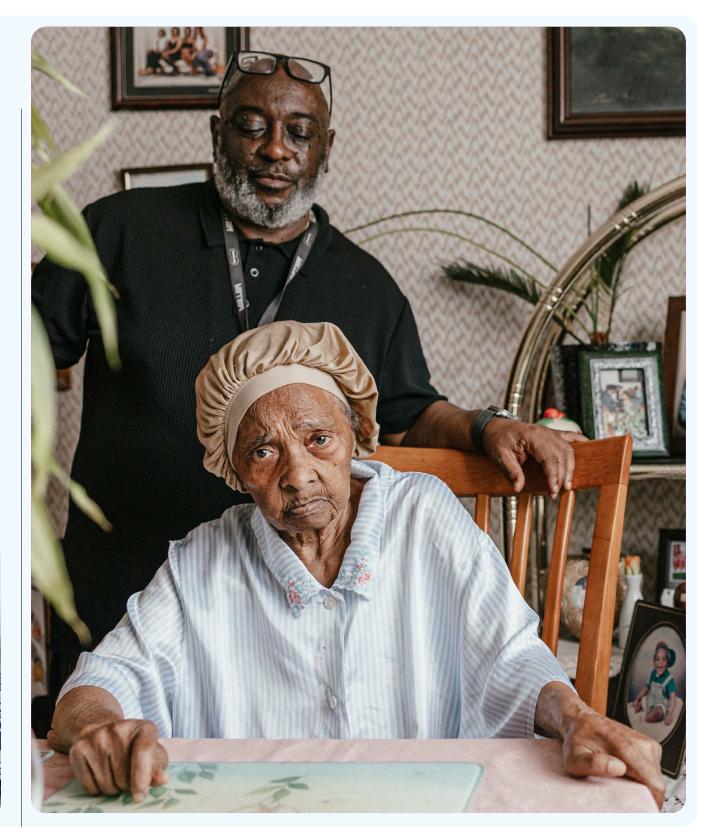


### Emilia is in her late 40s and cares for her father and brother who are both disabled, supporting them with personal care, household tasks and managing finances.

For Emilia, a short break away with her cousin would be respite from the 'stress and restrictions of day-to-day caring', and a time to switch off, rest, and 'be herself'.

Her Carer Support Worker relays how Emilia feels she is 'trapped' and has stopped seeing her friends and doing hobbies due to the demands of her caring role. A trip away with her cousin, with whom she is very close and usually unable to spend time with due to caring, would provide 'something to look forward to'. Emilia has been awarded a grant of £300 to travel to London and spend three days with her cousin.





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# Calendar of events

#### 2024

#### July

Rank announced they would be extending their partnership with Carers Trust for a further three years. Mecca Hartlepool completed a 5K colour run raising £1,500.

As part of the Grosvenor Goliath tournament, Grosvenor Coventry hosted 'Joker's Wild does Carers Trust', a charity event which raised over £5,000.

All the Grosvenor London venues took part in a London relay, walking from venue to venue and finishing when the Olympics opening ceremony commenced.

#### August



Raising a fantastic £2,106, 16 team members from Mecca Blyth, Gateshead, and Sunderland walked the 22 miles from Blyth to Sunderland.

Mike, General Manager from Mecca Blyth, challenged his team to raise £500 while he was on annual leave with a promise that he would shave his hair if they reached that total – they did, and Mike stayed true to his word and shaved his head!

Mecca Romford were the first venue to smash their fundraising target, reaching it in under five weeks.

#### September

The team from Mecca Dagenham completed a sponsored walk from Mecca Dagenham to Mecca Eltham Hill – ten miles in total – raising £1,440.





#### October

The Managing Director and Operations Director of Grosvenor attended the Grants Panel for Carers Trust.

Paul Baines, General Manager Grosvenor Bolton, ran the Chester Marathon, raising over £600.

#### November

General Manager Lynsey was slimed on stage, raising over £600.

Jo from Glasgow Quay shaved her hair off, raising over £1,000.

#### December



Our Maidenhead finance team bought and wrapped Christmas presents for Carers at Christmas, which were delivered to Camden Carers who celebrated with a festive party and gave out the donated gifts.

Rank donated, via their supplier Bidfood mince pies and mulled wine for the Carers Trust carol concert in St Paul's Church, London, which is an annual event held to raise funds for Carers Trust.

Mecca Bingo had been working with Spudman, who went to their Mecca Venues with an extra special spud. Spudman is regularly on dialysis and is cared for by Spudwife – Blackpool Carers went along to Mecca Blackpool to speak to him and he opened up about his wife caring for him.

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**The Rank Group Plc**Sustainability

Report 2025

## 2025

#### January

Lots of venues held fundraising initiatives to mark Chinese New Year, raising over £37,000 across the month.

#### February

Rank reached the £4m milestone in the funds it has raised to support unpaid carers.

66 Raising £4 million for Carers Trust is an incredible milestone and one that simply would not have been possible without the generosity of our colleagues and customers who have contributed over the past 11 years. Supporting our community is central to Rank's core value of responsibility, and with this in mind, we are now exploring how we can further build on our partnership with Carers Trust. I want to extend a huge thank you to everyone who has played a role in this partnership. Your support for carers across the UK makes a really big difference. 99

John O'Reilly Chief Executive

#### March

For Young Carers Action Day, 'Give me a Break', Rank promoted the Young Carers Covenant. There are over one million young carers and young adult carers in the UK and this commitment details the ten outcomes that will protect their futures.

The People Directors for Grosvenor and Mecca, as well as the Operations Director for Mecca attended the Grants Panel for Carers Trust.



#### **April**

Raising £5,000 for Carers Trust, Mecca colleagues from Blyth, Drumchapel, Paisley, Glasgow Quay, Glasgow Forge, and Hamilton completed an epic 25-mile charity walk around Glasgow.

London Marathon to challenge myself and make every mile count for something bigger – supporting Carers Trust! Every step I take is for the incredible unpaid carers who give so much of themselves every day. This run is my way of giving back, raising awareness, and showing what's possible when we run with heart.

#### Tammy Grosvenor Leicester



#### May

Grosvenor Glasgow Riverboat took part in a charity cycle and raised over £2,000.

#### June



Grosvenor Team Dundee took part in the 5K and 15K Tough Mudder, raising over £1,000.

Raising nearly £500, Matthew from Grosvenor Newcastle walked 26.2 miles in one day.

Bobbie at Mecca Dagenham shaved his head, raising over £1,500.



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# Enabling our colleagues to give back

Our colleagues remain deeply embedded within the communities in which we operate, and always welcome opportunities to contribute.

Throughout the past year, their dedication to volunteering for charitable organisations, coordinating fundraising initiatives, and donating to causes of local significance has been truly commendable, and we take immense pride in their collective efforts.

For example, the South Africa office marked Mandela Day by making toys for a local charity and partnered with Ladles of Love, an organisation dedicated to providing food to those in need, where they spent the day packing food parcels. We raised funds for the Sam's Superheroes Foundation in memory of a colleague's son, Sam, who tragically passed away from febrile infection-related epilepsy syndrome (FIRES) at five years old.

In Gibraltar, Scott Pitchford walked 158 km over 43 hours, raising £4,500 for Macmillan Cancer Support. Meanwhile, colleagues in Knotty Ash and St Helens teamed up for a sponsored walk, raising funds and awareness for Zoe's Place, a baby hospice supporting families in need, and Mecca Glasgow Quay raised £1,400 for Glasgow's Children's Hospital Charity.



#### Case study:

Fundraising at Mecca Romford

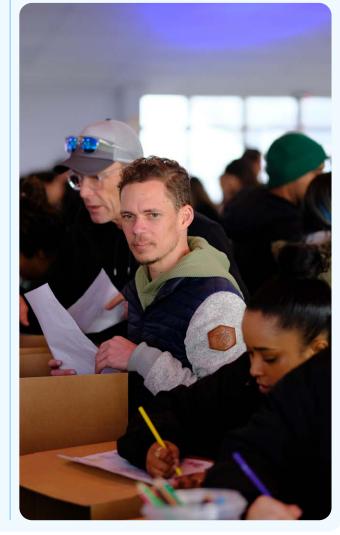
At Mecca Romford, the team set an ambition to reach their Carers Trust fundraising target within three months – however the team smashed this and reached their goal amount in under five weeks! Keeping the momentum going, the team have been fundraising for and supporting a number of local charities and organisations throughout the rest of the year, raising over £7,000 in total.

They were able to fund the purchase of a defibrillator for the shopping centre, donated goods, and raised awareness for S.M.I.L.E.'s local food and clothing drives, and provided raffle prizes for multiple schools.



The team fundraised for Sunny Days Children's Fund; Macmillan, via a brave colleague shaving their head; St Francis Hospice, through a memory walk; and Ageless Teenagers, a community centre in Romford.

In May, the venue held a Freddie Mercury tribute night to raised funds for the Barking, Havering and Redbridge University Hospitals NHS Trust.



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Basis of preparation: This report presents a review of the Rank Group Plc's ('Rank' or 'the Group') approach to, management of, and performance as it relates to Environmental, Social, and Governance ('ESG') issues which are material to the business.

The report covers the period from 1 July 2024 to 30 June 2025 ('2024/25'). The Group is dedicated to ensuring the sustainability of its operations by aligning its processes and policies to international best practice. This is part of its strategy to build an even more resilient and responsible business. Rank's stakeholders will have the opportunity to review the Group's activity and performance and to contact Rank with suggestions or comments to improve its accountability and transparency commitments

### Reporting standards and frameworks

This report has been informed by several globally recognised voluntary ESG reporting frameworks. Rank has disclosed the Group's non-financial performance in line with the Sustainability Accounting Standards Board ('SASB') industry standard for Casinos & Gaming, as well as material metrics and disclosures from the Multiline and Specialty Retailers & Distributors, and Software & IT Services SASB standards. This report was also developed with reference to the Global Reporting Initiative ('GRI'). Rank continues to disclose in line with the recommendations of the Task Force on Climate-related Financial Disclosures ('TCFD') which is mandated for listed companies in the UK.

The Group is aware of incoming regulatory standards resulting from its areas of operation. The International Financial Reporting Standards ('IFRS') S1 and S2 (the standards established by the International Sustainability Standards Board ('ISSB')), build upon existing reporting frameworks, including the TCFD and SASB, both of which the Group already reports against. The UK Government is currently developing sustainability reporting standards to implement the requirements of the ISSB, but these have not yet been published. Nevertheless, we have already commenced our review of the underlying disclosure requirements of the ISSB in order to be well positioned to meet these future statutory requirements.

Previously, due to its operations in Spain, Rank expected to be required to disclose against the EU's Corporate Sustainability Reporting Directive ('CSRD'). However, following the Omnibus announcement in February 2025, we expect that the Group will no longer fall under the scope of the CSRD. In 2024, Rank conducted its first double materiality exercise, against the requirements of the European Sustainability Reporting Standards ('ESRS') (the framework for achieving compliance with the CSRD). Though not required to meet the CSRD requirements, we have continued to approach materiality from a double materiality perspective, as we see this as best practice, and consideration of a financial materiality is a key requirement of IFSR S1.

In line with the Government's legally binding commitment to transition to a net zero economy by 2050, Rank is committed to reaching net zero emissions by that date. Rank has set an interim target for all operations to reach net zero on Scope 1 and 2 emissions and selected Scope 3 emissions by 2035. Rank has continued to develop its Net Zero Pathway which provides the roadmap to achieving its targets and plans to align these targets with the Science Based Targets initiative ('SBTi'). We are a now a step closer to this ambition, having calculated our Scope 3 emissions for the UK and Spanish businesses









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# **Global Reporting Initiative**

Rank Group plc has reported the information cited in this GRI content index for the period 1 July 2024 to 30 June 2025 with reference to the GRI Standards.

RI standard/other source	Disclosure	Location
2: General Disclosures 2021	2-1 Organisational details	Annual Report
	2-2 Entities included in the organisation's sustainability reporting	Page 73, Annual Report
	2-3 Reporting period, frequency, and contact point	Page 73
	2-4 Restatements of information	Pages 63, 79, 84, 85 & 86
	2-5 External assurance	Page 61
	2-6 Activities, value chain, and other business relationships	Page 5, Annual Report
	2-7 Employees	Pages 82 & 83
	2-9 Governance structure and composition	Pages 16, 56, 57 & Annual Report
	2-10 Nomination and selection of the highest governance body	Annual Report
	2-11 Chair of the highest governance body	Annual Report
	2-12 Role of the highest governance body in overseeing the management of impacts	Pages 16 & 56
	2-13 Delegation of responsibility for managing impacts	Pages 16 to 17 & 56 to 57
	2-15 Conflicts of interest	Annual Report
	2-16 Communication of critical concerns	Annual Report
	2-17 Collective knowledge of the highest governance body	Annual Report
	2-18 Evaluation of the performance of the highest governance body	Annual Report
	2-19 Remuneration policies	Annual Report
	2-20 Process to determine remuneration	Annual Report
	2-21 Annual total compensation ratio	Annual Report
	2-22 Statement on sustainable development strategy	Page 4
	2-23 Policy commitments	Rank corporate website
	2-24 Embedding policy commitments	Rank corporate website
	2-25 Processes to remediate negative impacts	Page 18
	2-26 Mechanisms for seeking advice and raising concerns	Page 18
	2-27 Compliance with laws and regulations	Page 17
	2-28 Membership associations	Page 17
	2-29 Approach to stakeholder engagement	Throughout this Sustainability Report
		and the Annual Report
	2-30 Collective bargaining agreements	Page 19

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Sustainability Report 2025 Rank Group plc has reported the information cited in this GRI content index for the period 1 July 2024 to 30 June 2025 with reference to the GRI Standards.

GRI standard/other source	Disclosure	Location
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Pages 6 to 7
	3-2 List of material topics	Pages 6 to 7
	3-3 Management of material topics	Throughout this Sustainability Report
		and the Annual Report
RI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Annual Report
	201-2 Financial implications and other risks and opportunities due to climate change	Pages 57 to 60
	201-3 Defined benefit plan obligations and other retirement plans	Annual Report
	201-4 Financial assistance received from Government	Annual Report
RI 203: Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	Pages 65 to 71
RI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Page 18
	205-3 Confirmed incidents of corruption and actions taken	Page 18
RI 206: Anti-Competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	Page 18
RI 207: Tax 2019	207-1 Approach to tax	Annual Report
	207-2 Tax governance, control, and risk management	Annual Report
	207-3 Stakeholder engagement and management of concerns related to tax	Annual Report
	207-4 Country-by-country reporting	Annual Report
RI 302: Energy 2016	302-1 Energy consumption within the organisation	Page 61
	302-2 Energy consumption outside of the organisation	Page 62
	302-3 Energy intensity	Page 61
	302-4 Reduction of energy consumption	Page 63
	302-5 Reductions in energy requirements of products and services	Page 62
RI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Page 64
	303-2 Management of water discharge-related impacts	Page 64
	303-5 Water consumption	Page 84
RI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Page 62
	305-2 Energy indirect (Scope 2) GHG emissions	Page 62
	305-3 Other indirect (Scope 3) GHG emissions	Page 62
	305-4 GHG emissions intensity	Page 61
	305-5 Reduction of GHG emissions	Pages 51 & 63
RI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Page 64
	306-2 Management of significant waste-related impacts	 Page 64
	306-3 Waste generated	 Page 84
	306-4 Waste diverted from disposal	Page 84
RI 308: Supplier Environmental ssessment 2016	308-1 New suppliers that were screened using environmental criteria	Page 19
RI 401: Employment 2016	401-1 New employee hires and employee turnover	Page 83
	401-3 Parental leave	 Page 44

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Rank Group plc has reported the information cited in this GRI content index for the period 1 July 2024 to 30 June 2025 with reference to the GRI Standards.

GRI standard/other source	Disclosure	Location
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Page 40
	403-2 Hazard identification, risk assessment, and incident investigation	Page 40
	403-3 Occupational health services	Page 40
	403-5 Worker training on occupational health and safety	Page 40
	403-6 Promotion of worker health	Page 40
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 40
	403-9 Work-related injuries	Pages 80 & 81
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Page 83
	404-2 Programmes for upgrading employee skills and transition assistance Programmes	Pages 42 to 43 & 46 to 49
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Page 44, 83 & Annual Report
	405-2 Ratio of basic salary and remuneration of women to men	Page 44 & Gender Pay Gap Report
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Page 19
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labour	Page 19
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	Page 19
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programmes	Pages 65 to 71
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Page 19
GRI 415: Public Policy 2016	415-1 Political contributions	Annual Report
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Pages 34 to 35
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Pages 80 & 81
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labelling	Pages 36 to 37
	417-2 Incidents of non-compliance concerning product and service information and labeling	Pages 36 & 80
	417-3 Incidents of non-compliance concerning marketing communications	Page 36 & 79
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Pages 20, 81, 86 & 87

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# Key performance indicators

Focus area	КРІ	2024/25	Target 2024/25	2023/24	2022/23Notes
Customers	Customer net promoter score ('NPS')	54	51	52	43 An average for last three months of the year and this Group score is a weighted average of all business units scored based on net gaming revenue ('NGR') % contributions.
Customers	Customer feedback scores on safer gambling	84%	85%	84%	78% Linked to executive remuneration.
Customers	Employee NPS on safer gambling	72	70	69	53 An average for last three months of the year and this Group score is a weighted average of all business units scored based on net gaming revenue ('NGR') % contributions.  Linked to executive remuneration.
Customers	UK digital customers using safer gambling tools	30%	43%	31%	This is the percentage of total active customers that have used safer gambling tools during the year.
Colleagues	Employee engagement score	8.3	8.0	7.9	- Linked to executive remuneration.
Colleagues	Percentage of women in senior roles	32%	40%	34%	These roles are defined according to the Companies Act 2006 definition of senior managers, which for Rank includes Executive Committee members, Executive Committee direct reports who are M1 and M3, and any statutory director not covered by the above. This now includes the direct reports of two senior colleagues within our UK digital business.
Environment	Reduction in absolute carbon emissions	5,520 tCO <sub>2</sub> e	4,604 tCO <sub>2</sub> e	-	- Please note, we previously reported 'Absolute carbon emissions'; moving forward, we will report the reduction in absolute carbon emissions.  Linked to executive remuneration.
Communities	Total charitable funds raised	£401k	£351k	£323k	£283k

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## **Data tables**

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Topic	Metric	Unit of measure	2024/25	2023/24	2022/23	
Anti-corruption	Number of hours per employee who undertook anti-money laundering training	Hours	0.5 hours	1.0	1.9	
Anti-corruption	Total number of whistleblowing incidents reported and investigated	Number	12	13	12	
Anti-corruption	Total number of hours of staff training – Anti-Corruption	Hours	21,344	7,221	12,817	
Anti-corruption	Number of reported cases due to unethical behaviour or corruption	Number	0	0	0	
Anti-corruption	Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	Number	0	2	0	
Anti-corruption	Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	Number	0	0	0	
Industry engagement	Percentage of UK trade association meetings attended	Percentage	100%	100%	100%	
Industry engagement	Contributions to consultations impacting Rank	Number	2	16	2	
Compliance	Number of personal management licence holders	Number	642	539 	543	
Safer gambling	Upheld breaches of advertising codes	Number	0	1	1	
Safer gambling	Total spend on television and radio safer gambling advertising (Mecca and Grosvenor)	Reporting currency	£3.2m	£2.2m	£1.1m	
Safer gambling	Percentage of customers under 25 by: 1) UK venues	Percentage	13%	-	-	
			This is an average of the percentage of under-25 visits to Mecca and Grosvenor venues. Due to a calculation error in previous years, the 2024/25 figure is the new baseline for this metric.			
Safer gambling	Percentage of customers under 25 by: 2) UK digital	Percentage	12.0%	13.0%	9.6%	

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### Customers

Торіс	Metric	Unit of measure	2024/25	2023/24	2022/23
Safer gambling	Percentage of customers under 25 by: 3) Spanish digital	Percentage	14%	14%	13%
Safer gambling	Number of safer gambling interactions (UK digital)	Number	208,852	136,138	291,706
Safer gambling	Percentage of customers who are under 25 with whom Rank have had safer gambling interaction (UK digital)	Percentage	9.5%	1.9%	1.3%
Safer gambling	Total financial contributions in support of research, education and treatment of problem gambling (covering the period of April 2023 – March 2024)		£700,540	£628,580	£576k
Safer gambling	Number of breaches in no under-18s policy (UK operations)	Number	ıı 	31	18
Safer gambling	Average number of hours of safer gambling training completed per employee	Hours	3.0	1.1	2.1
Safer gambling	Percentage of employees who completed mandatory safer gambling training on e-learning platform	Percentage	82%	100%	100%
Safer gambling	Number of non-compliance related to product responsibility	Number	1	0	0
Health and safety	Number of accidents (UK venues)	Number	818  The increase in reporting can be related to better training	383	456
			around reporting and the importance of reporting.		

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### Customers

Торіс	Metric	Unit of measure	2024/25	2023/24	2022/23
Health and safety	Number of accidents (Spanish venues)	Number	20	-	-
Health and safety	Number of accidents reported under RIDDOR (UK venues)	Number	10	7	1
Health and safety	Number of red internal audits	Number	11	1	-
			The increase in red audits is explained by the higher number of Food Safety Reviews, which is an area that is now completed internally by the H&S team due to previous issues and concerns with our external audit provider.		
Health and safety	Number of amber internal audits	Number	120	4	<del>-</del>
Health and safety	Number of colleagues that completed Health and Safety training (Excludes Spanish operations)	Number	8,087  This figure includes any colleagues that completed the training during the year but have subsequently left the business.	6,479	6,597
Health and safety	Percentage of gaming floor where smoking is allowed (excludes outdoor smoking areas)	Percentage	0%	0%	0%
Health and safety	Total paid in claims (H&S)	Reporting currency	£232,499.20	£97,634.46	-
			Claim values can increase year on year as Personal Injury claims can take years to settle, and some years there may be an increase even though the accident did not occur in the year being recorded.		
Health and safety	Total number of fines (H&S)	Reporting currency	0	0	-
Health and safety	Number of visits from EHO or fire authority	Number	32	41	-
Health and safety	Number of notices as a result of visits from EHO/fire authority	Number	I notice, but no further action as the venue in question has now closed.	0	- 
Health and safety	Number of non-compliance related to health and safety	Number	0	0	0

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Topic	Metric	Unit of measure	2024/25	2023/24	2022/23
Data privacy and IT security	Total number of identified leaks of customer data (defined as information disclosed in error)	Number	4	12	7
Data privacy and IT security	Total number of identified thefts of customer data (defined as unauthorised use of data)	Number	2	2	1
Data privacy and IT security	Total number of identified losses of customer data (defined as security incident)	Number	2	1	2
Data privacy and IT security	Percentage of data breaches involving PII	Percentage	100%	100%	-
Data privacy and IT security	Number of hours per employee who have undertaken data protection and security training	Hours	<b>5.2</b> This includes both GDPR ar RIST training.	0.9	0.9
Data privacy and IT security	Percentage of colleagues who have undertaken data security training	Percentage	94.1%	99.5%	97.0%
Data privacy and IT security	Statutory reports of personal data breach to the regulator	Number	1 UK, 1 Spain	1	0
Customer satisfaction	Customer complaints received	Number	2,851 UK, 12 Spain	1,716	
Customer satisfaction	Customer complaints to Director's Resolution Office (UK operations)	Number	40	70	141
Employment	Total number of employees (Full-time + part-time)	Number	7,776 (FT: 4,697 PT: 3,079)	7,594	-
Employment	Number of employees by gender (Full-time + part-time): 1) Male	Number	4,295 (FT: 2,962 PT: 1,333)	4,086	3,864
Employment	Number of employees by gender (Full-time + part-time): 2) Female	Number	3,481 (FT: 1,735 PT: 1,746)	3,508	3,388
Employment	Number of employees by age group (Full-time + part time): 1) <30 years old	Number	2,601 (FT: 1,321 PT: 1,280)	2,487	2,278
Employment	Number of employees by age group (Full-time + part time): 2) 30-50 years old	Number	3,358 (FT: 2,274 PT: 1,084)	3,327	3,243
Employment	Number of employees by age group (Full-time + part time): 3) >50 years old	Number	1,817 (FT: 1,102 PT: 715)	1,780	1,731

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Topic	Metric	Unit of measure	2024/25	2023/24	2022/23
Employment	Number of employees by geographical region (Full-time + part time): 1) UK	Number	6,492 (FT: 3,511 PT: 2,981)	6,410	6,085
Employment	Number of employees by geographical region (Full-time + part time): 2) Gibraltar	Number	77 (FT: 75 PT: 2)	86	75
Employment	Number of employees by geographical region (Full-time + part time): 3) Israel	Number	0	10	33
Employment	Number of employees by geographical region (Full-time + part time): 4) Mauritius	Number	389 (FT: 385 PT: 4)	352	328
Employment	Number of employees by geographical region (Full-time + part time): 5) South Africa	Number	161 (FT: 160 PT: 1)	134	97
Employment	Number of employees by geographical region (Full-time + part time): 6) Spain	Number	635 (FT: 544 PT: 91)	580	594
Employment	Number of employees by geographical region (Full-time + part time): 7) Malta	Number	22 (FT: 22 PT: 0)	22	40
Employment	Number of employees by employment category: 1) Senior management	Number	190	11	11
Employment	Number of employees by employment category: 2) Management	Number	448	 571	551
Employment	Number of employees by employment category: 2) Non-management	Number	7,138	7,012	6,690
Employment	Employee turnover (Full-time + part-time) - Group Wide	Number	2,848 (FT: 1,362 PT: 1,486)	3,189	-
Employment	Employee turnover rate (Full- time + part-time) - Group Wide	Rate	37% (FT: 18% PT: 19%)	43%	-
Employment	Number of non-compliance due to use of child labour and/ or forced labour	Number	0	0	0
Employment	Total amount of fines due to use of child labour and/or forced labour	Reporting currency	0	0	0
Employment	Number of Town Halls	Number	11	12	12
Employment	Number of underpayments	Number	0	0	-

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### Colleagues

Торіс	Metric	Unit of measure	2024/25	2023/24	2022/23
Employment	Total amount lost from irrecoverable overpayments	Reporting currency	£19,669	£1,125	-
			Due to the enhanced and optimisation of Dayforce (our HR system) this year, we have been given greater insight into payments after leaving, which in turn has resulted in an increase in this amount. We would expect to see a reduction in this figure next year.		
Employment	Percentage of payroll commit dates met	Percentage	100%	89.5%	-
Training and education	Percentage of management roles on leadership training programmes	Percentage	53%	4%	-
Training and education	Number of colleagues who have been trained by Grosvenor to be licensed dealers	Number	298	402	418
Training and education	Number of apprenticeships started in the year	Number	36	17	68
Training and education	Number of hours of voluntary training completed	Hours	4,872	4,092	-
Equality, diversity and inclusion	Percentage of employees that are women	Percentage	45%	46%	47%
Equality, diversity and inclusion	Number of women in senior roles	Number	25	21	-
Equality, diversity and inclusion	Gender pay gap	Percentage	4.3%	5.2%	11.6%
			This was the median gender pay gap figure for April 2024.	This was the median gender pay gap figure for April 2023.	This was the median gender pay gap figure for April 2022.
Equality, diversity and inclusion	ED&I score from Employee Opinion Survey ('EOS')	Number	8.0/10	-	-
			This was the average engagement score for ED&I across the Group for the survey conducted in November 2024.		

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### **Environment**

Торіс	Metric	Unit of measure	2024/25	2023/24	2022/23
Waste and water	Amount of hazardous waste (UK operations)	Tonnes	1.23	2.28	3.89
Waste and water	Amount of non-recycled waste (UK operations)	Tonnes	951	941  Due to a calculation error, this	1,149
				figure has been restated.	
Waste and water	Amount of recycled waste (UK operations)	Tonnes	908	997	1,053
				Due to a calculation error, this figure has been restated.	
Waste and water	Amount of non-hazardous waste (UK operations)	Tonnes	1,859	1,938	2,202
				Due to a calculation error, this figure has been restated.	
Waste and water	Non-hazardous waste management method -	Tonnes	733	735	857
	Incineration (UK operations)			Due to a calculation error, this figure has been restated.	
Waste and water	Total in fines or penalties from non-compliance with	Reporting currency	0	0	-
	recycling legislation (UK operations)				
Waste and water	Total net fresh water consumption, including data for fresh water extraction and	m³	199,385	-	-

Please find GHG emissions data tables on pages 61 to 63.

### Communities

Торіс	Metric	Unit of measure	2024/25	2023/24	2022/23	Code
Carers Trust	Funds raised for Carers Trust	Reporting currency	£400,890.93	£323,114.44	£283,019	
Carers Trust	Funds raised for Carers Trust since 2014	Reporting currency	£4,200,788.07	£3,799,897.14	£3,476,782	
Carers Trust	Number of carers supported	Number	687	546	480	
Carers Trust	Number of carers supported since 2014	Number	14,848	14,161	13,615	

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# Sustainability Accounting Standards Board ('SASB')

To enable our stakeholders to access those ESG metrics which are financially material to the business, we have included industry-specific metrics as recommended by the Sustainability Accounting Standards Board ('SASB').

Due to the industry we work in, we report against those metrics set out in the SASB Casinos & Gaming Standard.

However, as we feel that there are further non-financial metrics that are highly material to our business, we also choose to report against selected metrics from the Software & IT Services and Multiline and Specialty Retailers & Distributors standards. (We do not include all the metrics within the latter two standards, as not all are material to our business.)

Торіс	Metric	Unit of measure	2024/25	2023/24	2022/23	Code
Energy management	(1) Total energy consumed,	kWh	103,891,773	113,655,418	124,618,023	SV-CA-130a.1
				Due to a previous calculation error, this figure has been restated.		
Energy management	(2) percentage grid electricity and	Percentage (%)	7%	10%	57%	SV-CA-130a.1
Energy management	(3) percentage renewable	Percentage (%)	93%	90%	43%	SV-CA-130a.1
Responsible Gaming	Percentage of gaming facilities that implement the Responsible Gambling Standards and Criteria for Venues	Percentage (%) by revenue	Not applicable. The Responsible Gambling Council is a Canadian organisation - Rank does not have operations in Canada. Rank is compliant with the regulation and legislation in the jursidictions in which it operates, including the UK Gambling Commission. We take a responsible approach to gambling, and our efforts to promote safer gambling are detailed extensively in this report.	-	-	SV-CA-260a.1
Responsible Gaming	Percentage of online gaming operations that implement the Responsible Gambling Council (RGC) Standards and Criteria for iGaming	Percentage (%) by revenue	Not applicable. The Responsible Gambling Council is a Canadian organisation - Rank does not have operations in Canada. Rank is compliant with the regulation and legislation in the jursidictions in which it operates, including the UK Gambling Commission. We take a responsible approach to gambling, and our efforts to promote safer gambling are detailed extensively in this report.		-	SV-CA-260a.2
Smoke-free Casinos	Percentage of gaming floor where smoking is allowed	Percentage (%) of gaming floor area	0% Excludes outdoor gaming	0% Excludes outdoor gaming areas	0% Excludes outdoor gaming areas	SV-CA-320a.1
Smoke-free Casinos	Percentage of gaming staff who work in areas where smoking is allowed	Percentage (%) of manhours	0% Excludes outdoor gaming areas	0% Excludes outdoor gaming areas	3%	SV-CA-320a.2
Internal Controls on Money Laundering	Description of anti-money laundering policies and practices		Page 18	-	-	SV-CA-510a.1
Internal Controls on Money Laundering	Total amount of monetary losses as a result of legal proceedings associated with money laundering	Presentation currency	(defined as monies returned / divested following a conviction)	0	0	SV-CA-510a.2

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Topic	Metric	Unit of measure	2024/25	2023/24	2022/23	Code
Activity metric	Number of tables	Number	605 (UK Grosvenor) 545 (Spain)	593 (UK Grosvenor only)	622 (UK Grosvenor only)	SV-CA-000.A
Activity metric	Number of slots	Number	2,744  Due to a calculation error last year, 2024/25 is the new baseline for this metric.	-	-	SV-CA-000.B
Activity metric	Number of active online gaming customers	Number	785k	1,103k	1,120k	SV-CA-000.C
Activity metric	Total area of gaming floor	Square metres (m²)	9.5k (Spain) 36.lk (Grosvenor) 123.7k (Mecca)	167,809	-	SV-CA-000.D
Data Privacy & Freedom of Expression	Description of policies and practices relating to targeted advertising and user privacy		Page 20	-	-	TC-SI-220a.1
Data Privacy & Freedom of Expression	Number of users whose information is used for secondary purposes	Number	604	280	167	TC-SI-220a.2
Data Privacy & Freedom of Expression	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Presentation currency	0	0	0	TC-SI-220a.3
Data Privacy & Freedom of Expression	(1) Number of law enforcement requests for user information,	Number	294	112	134	TC-SI-220a.4
Data Privacy & Freedom of Expression	(2) number of users whose information was requested,	Number	316	112	160	TC-SI-220a.4
Data Privacy & Freedom of Expression	(3) percentage resulting in disclosure	Percentage (%)	100%	100%	71%	TC-SI-220a.4
Intellectual Property Protection & Competitive Behaviour	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	Presentation currency	0	0	0	TC-SI-520a.1
Data Security	(1) Number of data breaches,	Number	4	9	14	TC-SI-230a.1
Data Security	(2) percentage that are personal data breaches,	Percentage (%)	45%	60%	78%	TC-SI-230a.1
Data Security	(3) number of users affected	Number	10,000  Approximately 8,000 impacted by a single cyber attack	25,000  One data breach as a result of a cyberattack affected 24,000 customers.	425	TC-SI-230a.1

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Sustainability Accounting Standards Board ('SASB')

Горіс	Metric	Unit of measure	2024/25	2023/24	2022/23	Code
Oata Security	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards		Page 20		-	TC-SI-230a.2
Recruiting & Managing a Global, Diverse & Skilled Workforce	Percentage of employees that require a work visa	Percentage (%)	0.42	0.56 (UK workforce only)	-	TC-SI-330a.1
Recruiting & Managing a Global, Diverse & Skilled Workforce	Employee engagement as a percentage	Percentage (%)	83%	79%	72%	TC-SI-330a.2
Labour Practices	(1) Average hourly wage by region and	Presentation currency	Mecca hourly: £12.36 Grosvenor hourly: £13.41 Enracha venues: €11.58	UK: £12.52 Spain: €11.24	Mecca venues: £10.80 Grosvenor venues: £12.20 Enracha venues: €12.76	CG-MR-310a.1
Labour Practices	(2) percentage of in-store and distribution centre employees earning minimum wage, by region	Percentage (%)	Grosvenor: 29% Mecca: 54%	UK: 39.6% Spain: 17.3%	Mecca venues: 59% Grosvenor venues: 0% Enracha venues: n/a	CG-MR-310a.1
Labour Practices	(1) Voluntary turnover rate for in-store and distribution centre employees	Percentage (%)	Grosvenor Venues: 31% Mecca Venues: 24% Enracha Venues: 1%	UK: 33% Spain: 16.3%	Mecca venues: 35% Grosvenor venues: 44% Enracha venues: 3%	CG-MR-310a.2
Labour Practices	(2) involuntary turnover rate for in-store and distribution centre employees	Percentage (%)	Grosvenor Venues: 12% Mecca Venues: 9% Enracha Venues: 17%	UK: 13% Spain: 5.4%	Mecca venues: 23% Grosvenor venues: 14% Enracha venues: 0.5%	CG-MR-310a.2
abour Practices	Total amount of monetary losses as a result of legal proceedings associated with labour law violations	Presentation currency	£0 (UK)	£0	Only in respect of cases gone to hearing; lost tribunal claim in September 2022 and paid circa £4K in compensation	CG-MR-310a.3

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