Rank Group

To excite
and to entertain

Sustainability Report 2023

About this report

Basis of preparation

This report presents a review of The Rank Group Plc's approach to, management of, and performance as it relates to ESG ('Environmental, Social and Governance') issues which are material to the business. The report covers the period from 1 July 2022 to 30 June 2023.

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. Our stakeholders will have the opportunity to review the Group's activity and performance and to contact us with suggestions or comments to improve our accountability and transparency commitments.

Reporting standards and frameworks

To address the increased stakeholder focus on ESG issues, there are several internationally recognised reporting frameworks used to support disclosure, encouraging a robust standard of transparency and engagement. This report has been informed by several ESG reporting frameworks.

We have disclosed in line with the Sustainability Accounting Standards Board ('SASB') industry standards for Casino & Gaming, Multiline and Specialty Retailers & Distributors, and Software & IT Services. This report was also developed with reference to the Global Reporting Initiative ('GRI').

We have advanced our reporting in line with the recommendations of the Task Force on Climate-related Financial Disclosures ('TCFD'). In line with the Government's legally binding commitment to transition to a Net Zero economy by 2050, we have set interim Net Zero targets for our business. We are currently developing our Net Zero strategy and plan to align our targets with the Science Based Targets initiative ('SBTi').

![SASB logo] ![GRI logo] **TCFD** TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

Materiality assessment

Instrumental in informing the direction and focus of our reporting on ESG matters has been engaging with our stakeholders. In 2021 we conducted a materiality assessment reaching out to investors, suppliers, customers, and regulators, as well as subject matter experts within the Group, to understand their view on the most material risks and opportunities for Rank.

The hierarchy of material issues that resulted from this assessment continues to shape our reporting and the key areas of risk and opportunity for the business from an ESG perspective. We appreciate that the ESG landscape is ever evolving, as are the expectations of our stakeholders. As such, we will be conducting a review of this assessment in 2023.

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About Rank

Rank has been entertaining Britain since 1937. We bring excitement to millions around the world with our gaming-based entertainment brands and we are committed to doing this in a responsible way.

We continue to develop the products, tools and measures available for our customers to manage their play safely. We also take responsibility to improve our consumption of resources, entrusting our colleagues with the initiatives to deliver a sustainable operational impact. And we believe that by playing our part in the community, we can realise important socio-economic benefits.

Who we are

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

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Our purpose

To excite and to entertain

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.

Our aim

To provide a seamless, continuous, and personalised experience across any device or venue our customers wish to visit.

Our values

Service

Teamwork

Ambition

Responsibility

Solutions

Our venues

Mecca
Mecca is Rank's community-gaming brand for the British market. A national portfolio of 56 venues offering bingo, slot machine games, great value food and drink, and live entertainment.

Grosvenor
The UK's largest multi-channel casino operator with 51 venues. The brand offers a range of casino table games, including roulette, blackjack, baccarat and poker, as well as electronic roulette and slot machine games.

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, great value food and drink, and live entertainment.

Our digital brands

Mecca
The Mecca complementary digital channel offers a range of popular games, including bingo, slot games, and table games.

Grosvenor
Grosvenor's complementary digital channel offering many popular games, including its successful live casino, in addition to a sports betting offer. The Group also operates the market-leading digital bingo brand, YoBingo, to the Spanish market, alongside its digital casino offer, YoCasino.

In addition to its established brands, the Group also operates multiple digital brands, using a combination of proprietary and non-proprietary licensed software providing online bingo, casino and slot gaming.
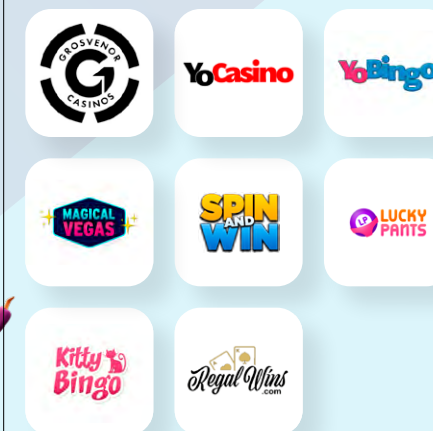
Highlights

Customers

+43
Customer Net Promoter Score (NPS)*

+82% +83% +73%
Grosvenor **Mecca** **UK Digital**

Customer feedback scores on safer gambling

+53
Employee NPS on safer gambling

43%
Percentage of UK Digital customers
using safer gambling tools

Colleagues

+14
Employee Net Promoter Score (eNPS)

35%
Percentage of women in senior roles

Environment

36.6
Carbon intensity ratio

Communities

£283k
Total charitable funds raised

*Customer NPS is calculated by averaging the scores from each of
the brands. For Grosvenor, Mecca, Enracha, and UK Digital, each
individual score was the average for 12 months to 30 June 2023,
whilst for International Digital this was the score at 30 June 2023 as
the customer survey was only conducted once during 2022/23 for
this part of the business.

Chief Executive's Introduction

"While our goal
is to deliver an
entertaining
experience,
we want all
our customers
to play within
their means,
and safer
gambling
is a constant
consideration
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customer
engagement."

Dear Stakeholder,

I am pleased to present
Rank's second annual
Sustainability Report.

We continue to mature our
approach to ESG and have
strengthened the governance
of sustainability initiatives
and performance. We have
done so via the formation
of new working groups,
comprising individuals across
the business and supported
by external consultants.

In recognition of the
importance of ESG on our
long-term business success,
we have also introduced
eight key performance
indicators (KPIs) across our
four focus areas – Customers,
Colleagues, Environment
and Communities. Four
of these KPIs are linked to
executive compensation
and further embed the
importance of ESG into our
core objectives and culture.

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Chief Executive's Introduction Continued

Customers

Safer gambling remains a primary commitment in both our business and sustainability strategy. While our goal is to deliver an entertaining experience, we want all our customers to play within their means, and safer gambling is a constant consideration in every customer engagement.

We continue to invest in technology to ensure that we remain at the leading edge when it comes to player protection. Through the development of our bespoke Central Engagement Platform ('CEP'), we are bringing all customer data into one single platform, improving customer visibility and enabling us to better monitor their play across all our brands, digital and land based. It has already enhanced the ability of our Grosvenor venues to observe incidences of harmful play in real time and added automation to the alert system for detecting potential problem gambling.

The experience and dedication of our colleagues remains an invaluable tool in safeguarding customers' mental and financial wellbeing. The relationships our venue teams establish with their customers deliver an irreplaceable human understanding of play at the individual level.

To complement the abilities of our colleagues in identifying 'at-risk' play, we have invested significantly in employee training. Between May to December 2022, in partnership with the charity GamCare, over 1,200 of our colleagues across Grosvenor, Mecca and Rank Interactive received in-depth training to detect and deal with harmful gambling. They have since reported an improved understanding of potential risks, and more confidence to act when they identify concerning playing behaviours.

Prior to the recent UK Government White Paper that will usher in new nationwide gambling legislation, we had already taken steps to ensure we would be ahead of statutory compliance. As such, whilst we continue to make advances across the business to improve the management and mitigation of risk, we are not compromising on the customer experience. We have been proactive to ensure that customer safeguarding improvements are made without friction or unnecessary playing interruption wherever possible. With a customer NPS of +43%, we are confident in the success of this approach.

Legislation in Spain is less prescriptive on mandatory safer gambling measures, rather focusing on preventing crime. Nevertheless, regulation will be tightening, and we are taking a similar approach in our Spanish businesses to ensure that we will already be compliant when new requirements come into effect.

Colleagues

To enhance our approach to colleague engagement, we introduced the position of Chief People Officer this year. I am pleased to see the immediate internal impact of this new role and focus. There is now a much stronger emphasis on culture across the organisation, and we are making great strides in elevating the employee experience.

Our People and Culture function has been restructured to improve the flow of information from all our locations up to Group level, ensure we are well placed to support our people and culture plans on a local level, and provide oversight of all aspects of the employee development lifecycle. This has helped to assess what works well and determine where we can improve.

Whilst we have invested greatly in employee professional development, we know there is more to be done to make sure that everyone is being brought along on the business's journey. Our conception of a compelling new Employee Value Proposition ('EVP') is central in addressing this. The EVP will improve outcomes for employees in every country of operation through the restructuring of our rewards and benefits policy. It will also create a greater cohesion through improved integration of our company values.

We have developed a listening strategy to map out the employee engagement interactions throughout the year, such as employee forum meetings and the twice annual employee surveys. The strategy is under constant review to make sure it is supporting improved engagement across the Group and that we are providing colleagues with access to our designated Non-Executive Director (NED) for workforce engagement.

The results of this strategy are already being realised in the evident quality of people we are bringing into the business, including at Executive level. Our employee Net Promoter Score (eNPS) of +14 is further testament to improved colleague sentiment.

Environment

Our consideration for our environmental impact has accelerated in recent years. This analysis reflects our commitment to being a responsible corporate citizen. It also recognises the material financial savings made possible by improving energy efficiency.

Our newly-formed Net Zero Working Group oversees decarbonisation initiatives across Rank. This year, the first step was to conduct an extensive energy audit of our venues in both the UK and Spain. By establishing a utilisation baseline, we now have a clear and comprehensive understanding of where energy savings and carbon reductions can be made. The application of monitoring technology in the UK captures energy use right down to the machine level. The data collected will additionally support preventative maintenance programmes, further improving both the carbon and cost efficiency of our operations.

Informed by our energy assessment, we have established Group-wide interim Net Zero targets, and are developing a strategy to support the achievement of these objectives. In Spain, we have already installed LED lighting, and we have introduced a number of simple solutions in our Mecca venues this year with the objective of reducing energy consumption. Fundamental to the success of our Net Zero goal will be the buy-in and strategy implementation from our colleagues. We have therefore developed an internal programme to raise awareness and instil behavioural change throughout our support offices and venues.

Communities

We greatly value the connections we have with the communities in which we operate. Whenever I visit a venue, I am always struck by how much our employees truly care about their customers. Bingo, especially, is an important weekly social occasion for many; as a result, our Mecca colleagues strike important relationships with their customers, and will even reach out to check-in on elderly patrons when they do not attend, as per their usual routine.

Embedded in these communities as we are, we can provide support that meets local need. Taking a largely decentralised approach to our philanthropic endeavours, we allow our clubs autonomy on the initiatives they champion. This year's activities have included everything from hosting community meetings and events in our venues, to preparing thousands of meals for homeless people, and donating to Easter and Christmas hampers as part of campaigns to support underprivileged groups.

At Group level, we are proud to have been partnered with Carers Trust for almost a decade. This year alone, we provided support to 480 carers, with colleagues raising £283,019 through hosting charity poker nights, completing marathons and bike rides, and much more. As we continue to develop our community strategy, we are keen to maintain our partnership, whilst also continuing to galvanise enthusiasm at a club level through the support of local causes.

John O'Reilly
Chief Executive

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Underpinning our four focus areas of Customers, Colleagues, Environment and Communities, is robust oversight of ESG performance.

There is clear oversight of the material risks and opportunities across the Group. By establishing KPIs against each focus area, we have strengthened our ability to track our performance and drive progress.

Material issues

Corporate governance

Executive remuneration

Regulatory compliance

Procurement practices

Supplier relations

Business ethics

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ESG strategy

Integrated strategic framework

During the development of our sustainability focus areas, we've ensured that our objectives relate to and integrate with our growth objectives. Sustainability also presents an opportunity to review our use of resources and better formalise the approach that we take to our customers, colleagues and communities in order to drive positive impacts and value creation.

Group strategic pillars	Provide a seamless and tailored experience for customers, across venues and online	Drive digital growth, powered by our proprietary technology and live play credentials	Continuously evolve our venues' estate with engaging propositions that appeal to both existing and new customers	Be passionate about the development and wellbeing of our colleagues and the contribution we make to our communities	Build sustainable relationships with our customers by providing them with safe environments in which to play

Focus areas	Customer	Colleagues	Environment	Communities
Modernise our core →	We have systems and processes to ensure we identify high risk play, carry out appropriate customer interventions and evaluate the outcomes See Pg.19–21 →	We are committed to creating a fair, safe and inspiring working environment	We are committed to sourcing our energy needs from renewable sources See Pg.38 →	We aim to provide an essential social outlet for customers that generates lasting community spirit See Pg.48 →
Extend our reach →	We position our brands to attract customers who want to have fun and be entertained	As well as attracting the best candidates, we aim to grow our own talent See Pg.29 →	As we improve our estate, we will minimise any negative effects our operations may have on the environment	We want to use the trust we have earned to contribute positively and will continue to advocate for greater cooperation and transparency in the market
Expand our footprint →	We will only operate in regulated markets	We want our differences to strengthen our culture and will continue to invest in a global team See Pg.30–32 →	Growth and expansion are not barriers to hitting our Net Zero target. Instead, our Net Zero strategy will take into account our growth ambitions and ensure these are offset accordingly See Pg.36–38 →	Being part of the Rank family assures best in class corporate governance across all of our territories
KPIs	Customer NPS Customer feedback score on Safer Gambling Employee NPS on Safer Gambling Percentage of digital customers using safer gambling tools	Employee NPS Percentage of women in senior roles	Carbon intensity ratio	Total charitable funds raised

Group strategic objectives

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ESG roadmap

This year a key focus has been on the continued development of our governance and operational systems for data collection. The aim was to improve the assessment of ESG performance, as well as ongoing stakeholder feedback.

Key actions and initiatives during 2022

Customers
Development of our Central Engagement Platform for the improved collection of data within the organisation, to provide better insights into player behaviour and to improve customer safeguarding measures.

Colleagues
Development of our colleagues' engagement strategy, with the creation of a revised Employee Value Proposition that includes enhanced reward and recognition.

Environment
Extension of our governance framework to include clearer distinction and accountability between oversight committee, steering and working groups for the implementation of sustainability initiatives and robust measurement.

Engagement with external specialists for the assessment of carbon performance. as well as recommended reduction strategies.

Board approval of our proposed Interim and 2050 Net Zero pathway.

Communities
Continued engagement Tent with our local and international communities to support them with specific charitable objectives.
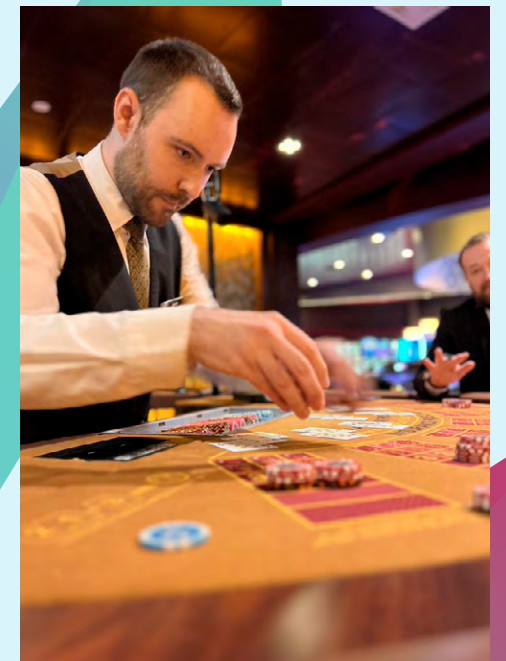
Future actions

Following Board approval of the proposed Net Zero pathway, the next step will be approval from the Board of the specific, SBTi accredited Interim 2035 and Net Zero 2050 targets and capital expenditure.

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ESG & Safer Gambling Committee Report

The Board's ESG and Safer Gambling Committee is focused on embedding ESG across the business and support the long-term success and sustainability of Rank in the interests of all Rank's stakeholders.

Committee membership and attendance

	Appointed	Attendance
Current members		
Katie McAlister (Chair)[1]	April 2021	4/4
Lucinda Charles-Jones	June 2022	4/4
John O'Reilly	May 2018	4/4
Alex Thursby	October 2019	4/4
Karen Whitworth	June 2022	4/4
Other members during the year		
Steven Eson[2]	March 2016	2/2

Meeting and attendees

All Committee members attended four scheduled meetings during the year.

The Company Secretary, the Director of Investor Relations and ESG, the Director of Compliance & Responsible Gambling, the Director of Public Affairs and the Managing Directors for Grosvenor, Mecca, Rank Interactive and International are regular attendees.

1 Katie McAlister was appointed Chair with effect 1 February 2022.

2 Steven Esom stepped down from the Committee in December 2022 following his resignation from the Board.

Role and responsibilities

The Committee is responsible for assisting the Company in the formulation and monitoring of its ESG strategy. The Committee also has a particular focus on the Company's approach to safer gambling. Its responsibilities include:
- Approving the Company's ESG and safer gambling strategy.
- Reviewing the Company's performance against the strategy, the effectiveness of the strategy and the governance in place to ensure successful delivery.
- Reviewing the effectiveness of Rank's systems for identifying and interacting with customers who are at risk of becoming problem gamblers.
- Reviewing the results of research projects.
- Reviewing how the strategy is received and regarded by the Company's stakeholders and other interested parties.
- Approving all ESG reporting.
- Approving the appointment of any auditor in relation to work undertaken in connection with the strategy.

The formal terms of reference of the Committee are available at www.rank.com or by written request to the Company Secretary, who acts as secretary to the Committee.

Key activities during the year

- Monitored and challenged the business in respect of progress against measures published in the Sustainability Report 2022, which was approved in August 2022.
- Considered feedback from stakeholders of the Sustainability Report 2022.
- Oversaw the continued development and implementation of the governance structure in support of the strategy, including establishing key performance indicators to measure meaningful progress.
- Considered initiatives to mitigate the 'cost of living' impact on colleagues, customers and communities.
- Discussed and further developed further management's approach to Task Force on Climate-related Disclosures ('TCFD') reporting framework.
- Reviewed and monitored delivery of safer gambling initiatives in each area of the business.
- Considered the outcomes of the UK Government's publication of its White Paper on gambling legislative reforms.
- Discussed Rank's contribution to developments across the industry, including consultation responses, working with trade associations and discussions with Government's review of gambling legislation.

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ESG & Safer Gambling Committee Report Continued

Dear shareholders

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

> "Safer gambling is the Group's primary ESG focus area and is the critical enabler to ensure the strategy places our stakeholders at the heart of Rank's success."

The Group is committed to ensuring the sustainability of its operations 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.

I was pleased with the good progress made during the year following the publication of our full Sustainability Report 2022 in September 2022, alongside the 2022 Annual Report and Accounts. This provided the foundations to accelerate Rank's ESG strategy during 2022/23 and I am delighted to publish our 2023 Sustainability Report.

Key activities
In 2021 the Committee determined that it would provide rigour, support and challenge to the business as it developed and implemented its new ESG strategy. During 2022/23, we have continued to embed and strengthen our ESG focus into each of the business areas, drawing on the outcomes of the materiality assessment carried out in 2021. During the year, the Committee also approved eight baseline key performance indicators ('KPIs') across the four key ESG focus areas that underpin the strategy as follows:

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 Scores; Customer responses to Safer Gambling questions; Employee responses to safer gambling questions and Percentage of customers using safer gambling tools.

2. **Colleague experience** – educating our people to enable and encourage positive gaming behaviours and creating a fair, inclusive and inspiring working environment.
   KPIs – Employee Net Promoter Score; and Percentage of women in senior leadership team.

3. **Environmental management** – ensuring that our operations minimise any negative impacts that Rank may have on the environment and reducing our carbon emissions wherever possible.
   KPI – Energy use as an intensity ratio (tCO_2 per £m Net Gaming Revenue).

4. **Community engagement** – providing an essential social outlet for customers, generating lasting community spirit, driving community action and developing a genuine social legacy.
   KPI – Total charitable contributions.

Each focus area has supporting performance measure as well as the primary KPIs shown above.

ESG initiatives
The Committee received business updates during the year to assess how the Company's ESG objectives aligned with the corporate and strategic objectives, see pages 30-41 of the Annual Report for more information on the Group's strategic intents. The Committee is comfortable that Rank is progressing its development of ESG iniatives 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 to drive ESG considerations across all business decision making.

Working with each of the business managing directors, the Committee has sought to further encourage ESG considerations across internal reporting. Such focus has embeded the necessity for each business area to ensure ESG alignment with the corporate strategic objectives and drive the effective delivery of the strategy and of initiatives that underpin it.

In continuing to develop its approach during the year, the business has ensured that the set four focus areas (Customers, Colleagues, Environment and Communities) were measurable and challenged the business to determine the appropriate KPIs. Reporting progress against eight principle KPIs to the Committee will provide a greater understanding of the company's ability to track and evaluate progress, and allow Board-level oversight of performance against strategy, in line with global best practice.

It was pleasing to see the initiatives in each business area and the Committee is assured that the underpinning People & Culture strategy is developing within each business area, particularly the focus on more diverse leadership teams. Also pleasing was the immediate impact on colleague engagement following the appointment of the Chief People Officer in September 2022, as well as improving our diversity at the executive level. See pages 28-34 for more information on insights into Rank's culture and colleague engagement in the year.

The charitable work in all of Rank's areas of business for its local communities, across all of Rank's jurisdictional locations was also positive to see, with strong partnerships, making important differences to Rank's local communities, see page 48-50 for more on this.

The Committee oversaw executive management's carbon management work through the newly formed 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').

The Committee considered the recommendations made to set Rank on a net zero pathway, which sets out a measured approach, and the establishment of an interim emissions reduction target to be achieved by 2035, alongside the longer-term target of achieving Net Zero by 2050. The Committee has worked with the Audit Committee in determining the TCFD aligned disclosures set out in our 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.

Safer gambling initiatives
Safer gambling remains the Group's primary focus area. The Committee has ensured that the importance of safer gambling within Rank's wider ESG framework is not diminished. We are comfortable that this has not happened.

During the year the Committee welcomed reports from the managing directors of each business area to provide updates on safer gambling initiatives. These initiatives take a 'customer-first' approach to increasing protection, as the Group continues to evolve its user journeys and deliver targeted improvements for those players who need our support. The Committee has considered new initiatives presented by management as well as those introduced further to the Company's own monitoring work or as required by our regulators. We have also considered changes resulting from new regulatory requirements and industry commitments.

In addition, the Committee welcomed further proposals to strengthen a safer gambling culture throughout the Group. The aim of this work is to instil a consistent approach to the processes and behaviours our colleagues employ to achieve Rank's purpose, and deliver exciting and entertaining experiences within a safe environment.

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ESG & Safer Gambling Committee Report Continued

To best equip our colleagues with the skills and understanding to recognise problem gambling, we have conducted extensive employee training. Every employee must complete mandatory safer gambling training on an annual basis, with progress being monitored through our online platform. Additional training is provided as required or according to a particular role's needs. We have engaged GamCare to provide bespoke safer gambling training on an ongoing basis to all customer facing colleagues.

During the year, GamCare conducted an assessment of our approach against their Safer Gambling Standard for all Rank's UK facing businesses. Mecca and Rank Interactive received confirmation that they have been awarded Advanced Level 2 accreditation. Grosvenor's accreditation is ongoing and likely to be determined during the first quarter of 2023/24.

It was pleasing to see this year's successful regulatory compliance assessments, and management's postive response to these assessments with changes made in the year to policies and practices to better protect our customers.

Safer gambling horizon scanning and industry collaboration

The Committee regards safer gambling as a high priority topic of the Company's stakeholders and an important part of its work is to consider their views on the Company's approach. The Committee recognises that the Company cannot simply look at the initiatives it has in-train as a reaction to regulation, but must also pro-actively consider customer, regulator, colleague, shareholder, political and wider public sentiment in its plans. The Committee receives regular reports from the Director of Public Affairs 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 the year, the Director of Public Affairs presented regular updates to the Committee on Rank's ongoing contribution to the Government's review of gambling legislation in the UK. Following the long-awaited publication of the Government's White Paper on gambling legislative reforms in late April, he kept the Committee informed of the consultation process as regulator's consider the implementation of the legislative reforms (see the Chief Executive's summary for more information on page 28 of our Annual Report). The Committee will continue to consider stakeholder views and those of the industry and media during this next phase of consultation.

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 also the Bingo Association, both 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 where appropriate, we are working hard to ensure that Rank's proposals and arguments are in tune with our peers and operators.

Research, education, treatment ('RET')

The proportion of our RET contributions during the year was maintained at the same level as the previous year. As well as contributing to GambleAware, such contributions included payments to YGAM and GamCare as part of Rank's four-year commitment to industry Safer Gambling Commitments. We are committed to maintaining the same proportion of RET contributions in respect of the forthcoming year, although the Committee is aware that the approach to RET payments is being considered within the Government's review of gambling legislation.

Climate change, Net Zero planning and Task Force on Climate-related Financial Disclosures

There has been increasing interest from the investment community on how climate change will impact companies. We recognise that there are both internal and external expectations on us to establish a clear emissions reduction strategy in line with international climate change targets and we are working with consultant partners in order to set Rank on a credible carbon net zero pathway.

The Committee is also cognisant of the new requirements under Listing Rule 9.8.6R, which the Group is required to adopt this year, to include a statement in our 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 39-46 with the compliance statement on page 46. The Committee has worked alongside the Audit Committee to ensure the integrity of the Committee's climaterelated risk process, as well as reviewing the recognition, measurement, presentation and disclosure of climaterelated matters (including impact on the Group).

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. The Committee's progress against last year's actions are set out below. This year, Rank's evaluation excerise focused at Board level, facilitated externally by Lintstock Limited. As part of the process, commentary included whether the Committee was operating effectively.

I am pleased to report the Committee is performing effectively and as a result, our ESG objectives are becoming increasingly clearer. The Committee will continue to work with management to maintain and improve the focus on ESG across all areas of the business, whilst ensuring safer gambling initatives remain the primary focus.

Progress on 2021/22 agreed focus areas during the year
1. Agreed actions
To develop the Committee's meeting agendas further in-line with the newly developed focus areas of Customer Experience, Colleague Experience, Environmental Management and Community Engagement and their associated KPIs.

Progress made during 2022/23
The Committee ensured all business reporting was focused on the key priorities and developments against that of the customer experience, colleague experience, environmental management and community engagement.

2. Agreed actions
To ensure clear accountability for reporting under the new KPIs, delivery of actions and tracking of progress.

Progress made during 2021/22
The Committee approved eight baseline KPIs across the four key prioritites (as set out above) which underpin the strategy. Also approved were four KPIs for remuneration target measures, see the Remuneration Report for how this was implemented in the year on page 137 of the Annual Report.

Focus areas for 2023/24
Whilst there were no particular outcomes for the Committee evalution this year, we contiinue to focus on the development and monitoring of management's ESG initiatives, and measure achievement through appropriate KPIs. The Committee concluded the focus for the year ahead should continue to keep management accountable for all areas of ESG and ensure Remuneration and Audit Committee KPI's align

1. To maintain the focus and continued development of ESG reporting on the four focused areas of customer experience, colleague experience, environmental management and community engagement.
2. To continue to evolve and measure management's delivery of ESG initiatives under the four KPIs.
3. To assess and monitor the development of the NetZero plan.

In conclusion
Rank recognises the importance of continuing to strengthen ESG across all Rank's operations and to ensure 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 thread ESG into all 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 one that protects shareholder value, creates opportunities for growth and innovation and sets Rank's long-term success.

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, particularly in light of the White Paper, to ensure ongoing compliance with regulatory requirements and our align with our industry peers and 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 further progress and continued development that will be made over the forthcoming year that will support our ESG strategy and agenda.

I look forward to meeting shareholders at the forthcoming Annual General Meeting when I will be happy to answer any questions on this report.

Katie McAlister
Chair of the ESG & Safer Gambling Committee

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Governance framework

ESG Governance

To support effective Environmental, Social and Governance ('ESG') management, we have a robust governance framework. Overall responsibility for setting the Group's ESG strategy sits with our Board of Directors, supported by the oversight and expertise of the ESG & Safer Gambling Committee. Progress reports are provided to the Board by the Chair of the Committee, whilst the Group's Risk Committee keeps the Board appraised of any new or emerging ESG-related risks.

This year, we have further strengthened our governance structure at management level. In order to drive our ESG agenda and operationalise our strategy across the Group, we set up an ESG Working Group ('ESG-WG') with representatives from each area of the business, which reports into the ESG Steering Group ('ESG-SG') at Executive Committee level. Our aim is to provide purposeful direction on decarbonisation. To achieve this, our Net Zero Working Group, supported by external consultants with environmental management expertise, is developing a strategy to reach Net Zero emissions in line with our targets.

We established four key areas of focus to provide structure and clarity in our reporting: Customers, Colleagues, Environment and Communities. This structure is underpinned by our understanding of the material ESG risks and opportunities to the business, informed by a study conducted with a cross-section of our stakeholders, and our Group corporate objectives.

This year we have introduced Key Performance Indicators in each of the four areas, to support performance reporting. We believe that the long-term success of our business is dependent upon how we manage non-financial matters, and a figure will therefore be linked to executive remuneration, sharpening our focus on ESG-related performance.

Regulatory environment

In the operating locations in which we are required to have a licence – the UK, Spain, Alderney and Gibraltar – we are subject to the laws and regulations of each jurisdiction. The regulatory bodies in each location are the Gambling Commission in the UK, Comisión Nacional del Juego in Spain, the Alderney Gambling Control, and the Gibraltar Regulatory Authority. We hold the relevant operating licences and land-based venues licences in each jurisdiction, as well as individual licences for those in key management roles. We also hold personal functional licences for specific gaming roles within our casinos.

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 are building a reputation as a responsible operator. We attend regulator workshops, key stakeholder meetings and regulator conferences at every opportunity.

We acknowledge that there is always room for improvement in our approach to compliance and we review the effectiveness of our framework of compliance controls on a regular and ongoing basis. In doing so, we examine guidance issued by regulatory bodies and published as learnings for the gaming industry. We also evaluate guidance and requirements for improvements issued to Rank following compliance assessments.

We are committed to preventing gambling from being a source of crime, and comply with anti-money laundering (AML) regulation in the countries in which we operate. We use specific models in our business to identify AML risks that might require enhanced scrutiny, ongoing monitoring and checks. We also provide training, policies and procedures to prevent money-laundering, bribery and corruption. 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.

543

Number of personal management licence holders

1.9hrs

Number of hours per employee who undertake AML training

Legislative change

Having launched its review of gambling legislation in December 2020, the UK Government published a White Paper in April 2023, setting out the public policy changes that will impact the regulation of the UK gambling sector. The review focused heavily on online regulation but also assessed the appropriateness of land-based gambling regulation, relative to online regulations. We're committed to offering industry-leading player protection and a high-quality experience to all our customers. We support, therefore, the Government's objective to strike the right balance between consumer freedoms and choice, and protection from harm.

We have adopted a proactive approach to meeting these incoming regulatory changes and we had taken steps to prepare the business for legislation and regulatory change when it comes. We are less likely to be materially impacted by the policy relating to enhanced financial risk assessments for players, owing to the work we have already undertaken to make sure that our customers are playing at safe levels. Importantly, this regulatory development will create a level playing field, at least amongst UK licensed online operators.

The Government is consulting on a maximum stake for online slot games and is considering options ranging from £2 per spin to £15. This will have a commercial impact on digital revenues, but we would hope that the threat of driving online customers onto unlicensed sites will enable a sensible outcome for UK consumers.

The critical focus now will be the timing of implementation of the various public policies. Some are likely to involve increased costs (establishment of an Ombudsman, statutory levy for research, education and treatment, potentially higher licensing fees), but we believe the overall package of measures will be net positive for the Group.

Case study: Gambling Commission Conference

In the UK, the Gambling Commission this year hosted its first ever gambling research conference, Setting the Evidence Agenda. This was an important event for bringing betting and gaming businesses from across the UK together with representatives from academia, support charities, and members of the Commission itself. Our Chief Data Officer, Director of Public Affairs and Director of Compliance attended.

The conference focused on the use of data in the industry as it links to safer gambling and on creating a more consistent approach through greater collaboration. Our Director of Compliance also represented Rank on the closing Q&A panel of the event, alongside the Chair of the Commission, Executive Director of the Commission, and the keynote speaker and Deputy National Statistician at the ONS.

GAMBLING COMMISSION

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Governance framework Continued

Industry associations and accreditations

Industry associations act as a vehicle for sector representation and statutory change. As members of several associations, we have been able to share knowledge, advocate for improved standards, and contribute to discussions on new regulation in the sector.

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. This year we were re-elected as a Category B member onto the Executive Committee of the BGC, which is an influential body in setting standards of the industry to the Government. We also sit on the Casino Committee, meeting with our peers on a fortnightly basis. In Spain, we are members of Jdigital, the country's online gambling trade association.

The Bingo Association ('BA') is the trade group for all licensed bingo operators in Great Britain. As the second largest member of the association, based on venues, and the largest for revenue, we hold a key position of influence; our Managing Director of Mecca was appointed as Chair of the BA this year.

Rank makes financial contributions to GambleAware and YGam in support of research, education and treatment of problem gambling. In 2022/23, Rank pledged a total of £576k (of which £394k went to Gambleaware and £182k to YGam). We have also worked with the organisations GamCare and Gordon Moody, to provide safer gambling training to colleagues and improve understanding of problem gaming respectively.

At the start of 2022, we agreed to instruct an evaluation against GamCare's Safer Gambling Standard. This is an independent quality standard that assesses the measures gambling businesses take to protect people from experiencing gambling-related harm. The UK digital business was assessed in July 2022 and obtained an Advanced Level 2 accreditation, certifying that we have adopted a range of measures that go beyond the social responsibility provisions of our gambling licence.

GamCare conducted an assessment in November 2022 against their Safer Gambling Standard for both Grosvenor and Mecca venues. Mecca received confirmation that it has been awarded GamCare's Gold Advanced Level 2 accreditation standard in May 2023. Grosvenor's accreditation is ongoing and likely to be determined in August 2023. Re-evaluations are conducted after two years, and our objective is to meet the requirements to achieve Advanced Level 3 (the highest accreditation) for the digital and venues businesses.

100%
Percentage of UK trade association meetings attended

2
Contributions to consultations impacting Rank

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Business ethics

Every employee at Rank is expected to comply with the highest standards of business ethics. Our guidelines for professional behaviour are enshrined in our Group policies, including but not limited to our Code of Conduct, Anti-Money Laundering ('AML'), Anti-Corruption and Bribery, Data Protection, and Health and Safety policies. All employees must be made aware of these standards and complete mandatory refresher training every year. Training is conducted through our online training platforms (Springboard, in the UK, and Campus, in Spain) and employee completion rate is monitored.

Our whistleblowing programme, Speaking Up, enables employees to raise possible improprieties in confidence. The programme offers multilingual communication channels operated by an independent service provider and ensures the anonymity of the individual reporting a concern. Reports are submitted by the third party to the Group General

Counsel in the UK who is responsible for managing internal investigation, if required. Reports received are kept strictly confidential and the concerns identified referred to appropriate managers within the Group for investigation and resolution. In Spain, as well as making reports via the independent service provider, employees can also raise concerns directly with the HR Director.

It is important that employees are empowered and able to report any violations of business ethics and we promote the availability of this procedure periodically, have signage in the support offices, and ensure it is accessible on the company intranet. We also encourage our colleagues to raise any issues directly with their line manager, if they feel comfortable to do so.

Our Group General Counsel oversees our legal, data protection, compliance and health and safety teams, and reports to the CEO. In Spain, the Compliance Manager reports to the Managing Director and escalates any serious issues to the Director of Legal Services. 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.

12

Total number of whistleblowing incidents reported and investigated

Supply chain management

Operating in the highly regulated industry of betting and gaming, we must ensure that the third parties we work with are compliant with industry 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.

To support continuity of our service offering, we seek to engage high quality manufacturers and establish long-term partnerships. As such, we work with industry-leading suppliers. Regular assessments of our gambling equipment and software suppliers are conducted, including benchmarking against other suppliers in the industry, and we do not renew contracts if they are underperforming. We carry out quarterly business reviews and all games are audited on an annual basis.

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.

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.

With rising focus from international jurisdictions on climate change targets and associated legislation, the environmental credentials of suppliers will increasingly come under scrutiny. We have made great strides in our Spanish operations; at Enracha we are committed to working with suppliers that apply measures to reduce the use and pollution of lighting and noise, and we are working on including sustainability criteria (including energy efficiency) when purchasing new machinery.

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Providing an entertaining and exciting experience for all our customers is a central focus of our business.

To achieve this, we want to offer our customers fun and entertainment, whilst ensuring that they play within their means. Safer gambling considerations are therefore at the forefront of our consumer engagement and embedded into everything we do. We continue to develop our approach, utilising new technology and deepening employee awareness, to increase the sophistication of our methods of detecting at-risk play.

Material issues

Product safety and quality

Ethical marketing

Customer welfare

Customer privacy and data security

Protecting young and vulnerable customers

Responsible gaming

Health and safety

KPIs

+43

Customer Net Promoter Score (NPS)*

+82% +83% +73%
Grosvenor   **Mecca**   **UK Digital**

Customer feedback scores on safer gambling

+53

Employee NPS on safer gambling

43%

Percentage of UK Digital customers using safer gambling tools

*Customer NPS is calculated by averaging the scores from each of the brands. For Grosvenor, Mecca, Enracha, and UK Digital, each individual score was the average for 12 months to 30 June 2023, whilst for International Digital this was the score at 30 June 2023 as the customer survey was only conducted once during 2022/23 for this part of the business.

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Safer gambling is at the heart of everything we do when it comes to customer safety.

We believe that providing excellent customer service, safe environments, and protecting personal data are also important factors that attract customers to our brands. To ensure there is oversight of all aspects of the customer experience, we have established clear accountabilities throughout the organisation and robust reporting lines into the Executive Committee.

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 Compliance to ensure adherence to the laws and regulations that govern their relevant jurisdictions. The ESG & Safer Gambling Committee meet every quarter to receive updates, from the Managing Directors and the Director of Compliance, on all matters pertaining to player protection. They then report any findings to the Board.

Strong governance processes are in place to manage IT and data security, led by the Chief Data Officer, Chief Information Officer and Director of IT Security. Our customer services teams report into the Chief Operating Officer, and the Head of Health and Safety submits monthly reports received by the Risk Committee, Chief Executive Officer and Chief Financial Officer.

Safer gambling

Safer gambling messaging
The focus on keeping our customers safe underlines everything we do at Rank. Safer gambling messaging is incorporated into our operations and communications across the Group, internally and externally and across all brands. The objective of consistent safer gambling messaging is to maintain a strong awareness amongst customers, ensure that relevant support is signposted and easily accessible, and keep safer gambling central in the minds of our employees.

We follow industry best practice on safer gambling messaging and ensure we are compliant with GamCare's Industry Code for the Display of Safer Gambling Information on websites and apps. The Code for land-based venues was also introduced this year. We were part of the working group to establish this code, providing updates to the compliance committees regarding our compliance progress, ahead of its implementation in April 2023. Safer gambling messaging is present throughout the customer journey. As part of our welcome communication for every person that registers to play with us either online or in venue, we send a safer gambling message that focuses on important safer gambling information and tools available to all players. All customer communications and every page on our websites provide a link to safer gambling information.

In the UK, our standalone, dedicated safer gambling website, *Keep It Fun*, provides a hub for advice and information on safer gambling tools available for customers gaming online or in our venues, including 'How to' materials. The Keep It Fun messaging appears on all our communications, as standard.

This year, we conducted a full audit of our messaging against the GamCare Code of Conduct, which has updated the requirements for the visibility of safer gambling messaging in UK land-based venues. We now have '360' messaging on safer gambling across our locations. This is mostly presented by way of printed information available for customers to read or take home. In our newly refurbished venues, however, we have more digital touchpoints, which we are utilising to display safer gambling messaging.

We use landscape posters rather than portrait to draw attention, and we have changed our colourways to reflect more calming palettes, based on research by the NHS. Safer gambling notifications are on all machines across the Mecca and Grosvenor estate and there is appropriate signage in the slot machine areas. Resources are available for customers in the venues as well as in the back offices.

In our Spanish venues, safer gambling messaging can be found on all slot machines and on posters in the venues. These signs provide information on where players can seek help, and there are resources and links to gambling charities on the safer gambling page of the Enracha website. We ensure that leaflets and posters are displayed and available in employee areas of the venues, to remind colleagues of our commitment to safer gambling and provide easy access to materials and information.

For the Rank Spanish digital business, all sites feature links to safer gambling resources and support organisations. Customer communications and marketing include links to our safer gambling page and the national self-exclusion scheme.

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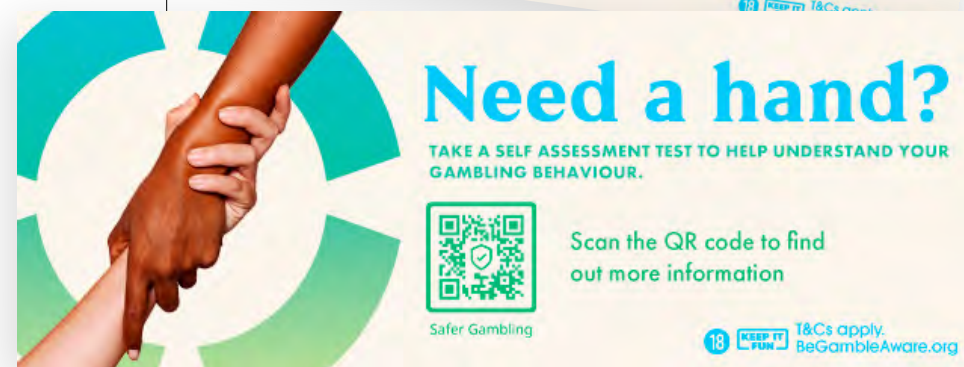
Safer gambling Continued

Safer gambling tools

To minimise the risk of gambling-related harm, we provide customers with tools to help them remain in control of their play. We continue to review our existing measures, introduce new tools or updates based on player behaviour, and ensure that we are compliant with industry requirements. The principal method for controlling play is setting limits, whether for time, deposits, or loss, but customers can also take a break from gambling or self-exclude from playing altogether.

Deposit or loss limits

In the UK, we openly encourage our digital customers to set a deposit limit to manage the amount of money that they can deposit into their account. Limits can be set for a 24-hour, seven-day or 30-day period. Customers must wait 24 hours before a deposit limit can be increased. Rank's Spanish digital customers can similarly set up limits on spend.

In our UK venues, customers themselves can apply machine time and loss limits at slots and electronic roulette machines in our Grosvenor venues and on B3 gaming machines within the Mecca estate. The slot machines will 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.

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 relevant venue's manager, who can then assess and determine whether a formal interaction with the customer is necessary.

Time limits

We help digital customers in the UK manage the amount of time they spend playing online by offering a Reality Check alert on their account. Once set, a pop-up alert will be displayed as a reminder that the customer has been logged into their account for the specified period of time. Customers who feel that setting limits is not sufficient to control their play 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, customers can also set themselves time limits on play.

In our UK venues, as well as deposit/loss limits, customers can set time limits on the same machines, with reminders popping up accordingly. Mecca's 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 whilst also continuing to enjoy the social aspect of the bingo club.

## Customer-led self-exclusion

For customers that are concerned that they have a problem with gambling and feel that the tools available are not sufficient to protect them, self-exclusion may be the best decision. All our channels offer the option to self-exclude, which is an enforced break from gambling. 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.

Customers are also able to self-exclude by means of national schemes in Great Britain. These are GAMSTOP for digital, SENSE for land-based casinos, and BISES for land-based bingo. These programmes offer the ability for customers to self-exclude from all regulated operators. 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. As aforementioned we direct our customers to our Keep It Fun website, which includes details of these national self-exclusion schemes.

In the UK digital business, we are making improvements to provide players with more self-serve options, which will enable our customers to resolve issues without having to speak with a member of the customer service team directly.

In Spain, customers can self-exclude from playing, via a nationally managed scheme. The exact process varies depending on the region, but all involve requesting exclusion via the City Council. They are then excluded from playing for a fixed minimum period, after which the Safer Gambling team will assess whether they can resume play. We are developing our own operator approach which will be very similar to this procedure in line with incoming legislation. Once a customer has self-excluded, they cannot enter the clubs, are removed from the customer database, and will not receive any communications from Enracha.

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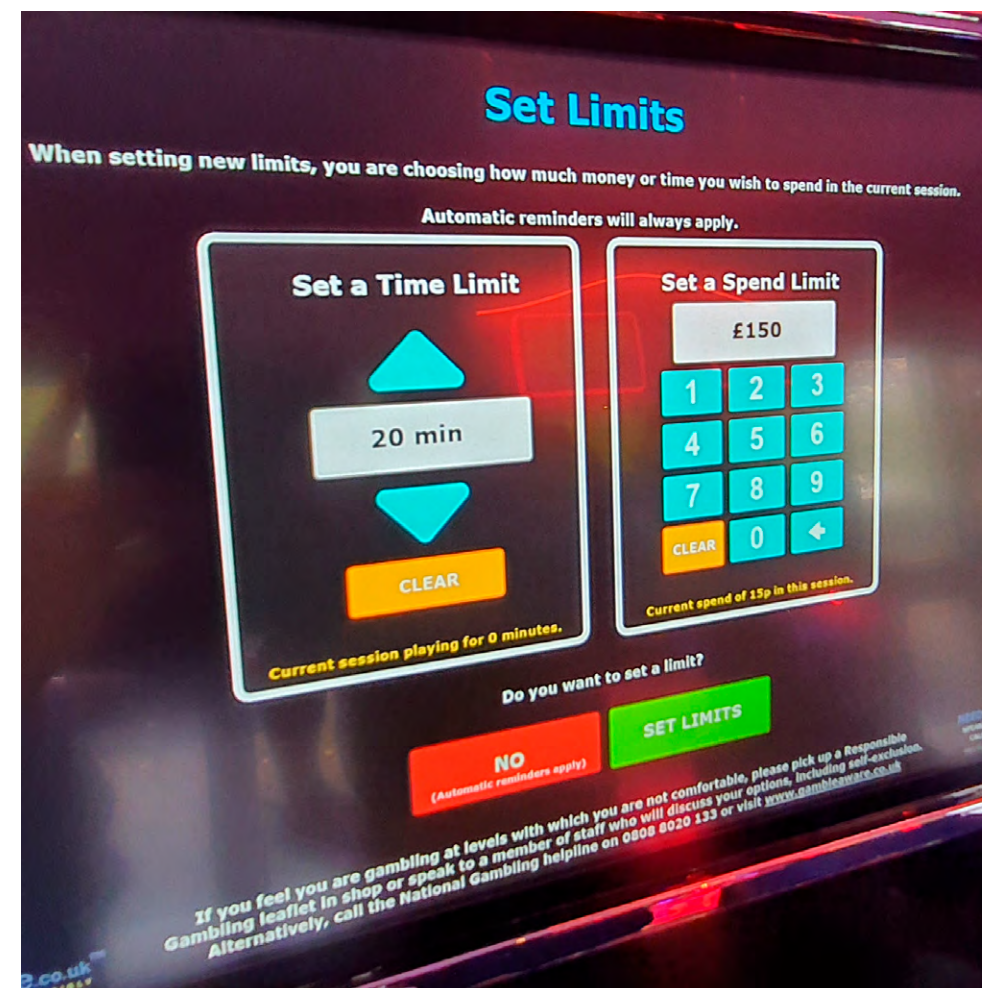
Safer gambling Continued

Detecting at-risk customers

Even with the efforts we take to educate our customers about safer gambling, and the tools we provide to facilitate responsible gaming, a very small proportion of customers will exhibit problem gambling behaviours. As such, it is critical that we take every appropriate step to quickly identify these individuals and provide them with the support they require, all without creating friction for the other customers.

The approach that we take varies by business unit and by jurisdiction. We have made significant investments into technical solutions and data models, in both our digital and land-based venues. We recently rolled out the risk matrix app for Grosvenor venues and we are rolling out Playsafe in Mecca.
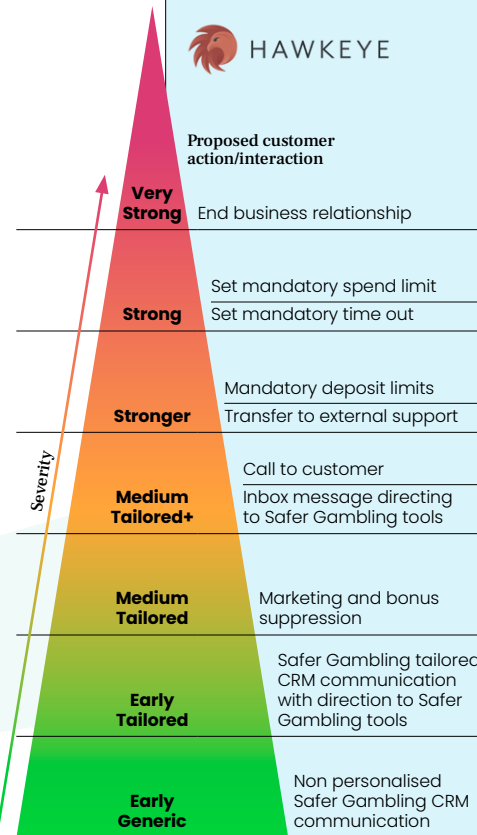
Data models
Markers of Harm model (UK digital)

This year, we completed the rollout of our new 'Markers of Harm' model for the UK digital business; the change in the model was made to achieve compliance with the Licensing Conditions and Code of Practice ('LCCP') changes introduced by the Gambling Commission in September 2022 and February 2023. The model 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.

It enables us to identify those customers for whom an early intervention may be appropriate, and approach such intervention in a more tailored and personalised way. This can range from an inbox message, 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. Furthermore, we have introduced a measure that prevents anyone scoring over a particular level from receiving any marketing, in line with regulatory requirements.

291,706

Number of safer gambling interactions (UK digital)

HAWKEYE

Proposed customer action/interaction

Severity		Proposed customer action/interaction
Very Strong		End business relationship
Strong		Set mandatory spend limit
		Set mandatory time out
Stronger		Mandatory deposit limits
		Transfer to external support
Medium Tailored+		Call to customer
		Inbox message directing to Safer Gambling tools
Medium Tailored		Marketing and bonus suppression
Early Tailored		Safer Gambling tailored CRM communication with direction to Safer Gambling tools
Early Generic		Non personalised Safer Gambling CRM communication

Affordability assessments (UK digital)

We never want our customers to spend more than they can afford and we aim to support them to make informed, responsible decisions. 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 the 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. We are currently developing a similar model in Spain, where we will assess risk of problem gambling according to affordability.

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 players' 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 also have the ability to observe customer behaviour first-hand; they also know their customers from face-to-face interactions and day-to-day provision of customer services. They use their insight and personal knowledge of players, together with the data provided by the risk model report in Grosvenor, in order to determine if any further interaction is required.

Monitoring digital play in real-time

We use Hawkeye, our 24/7 live monitoring system, to monitor digital play in real-time. Our agents monitor numerous different behaviours, including stakes, session length, velocity of play and late-night play. This year, we introduced our Markers of Harm model as an overlay for the system. This means that the agents monitoring play are able to also understand a customer's risk level, thereby better informing the type of interaction that may be required.

Monitoring venue customer activity in real-time

NEON, our casino management system, monitors all players that have attended Grosvenor venues. This year, we introduced two new features. The first is a prompt on the system when a customer has spent £5,000 at the tables. The second is a notification should a customer have visited more than one casino in the same day and have spent above Grosvenor's thresholds. Both new features assist our teams in managing our customers in a responsible manner ensuring that customers are playing within their means.

To deliver a more efficient and intuitive process for management of the current risk model at Grosvenor venues, we developed the model into our new Risk App, which we launched this year. The app provides ready access to key customer details and automatically updates NEON with the outcome of the review/interaction.

From the daily report generated by 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.

In the Mecca venues, we can track customer spend on the Max electronic bingo tablets. This year, we began the rollout of Playsafe, a new machine management system which will enable B3 machine play to be monitored in real time. PlaySafe is a significant step forward in how we identify potentially harmful play on machines. Completing the rollout of the technology during 2023, embedding its day to day use in our business, evaluating its effectiveness at ensuring our visitors play responsibly and refining its application will be a key ongoing priority over the next 12 months. We will also continue to refine the application.

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, This includes ID verification. 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.

We have also further developed our Safer Gambling Department and the platform and reporting mechanisms within Rank's Spanish digital business. We have standardised templates, protocols and the alert system, as well as updating the Safer Gambling Manual.

The Hawkeye work station

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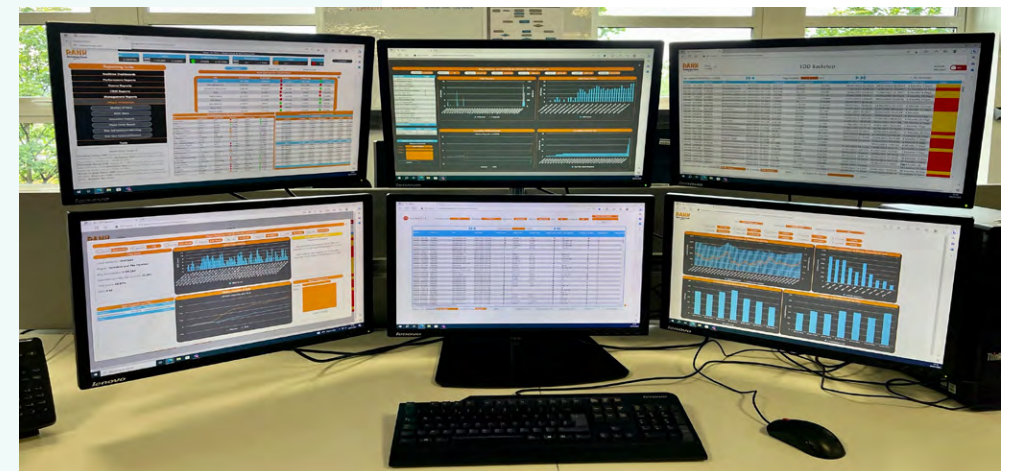
Spotlight: Central Engagement Platform

Group-wide decision making

By developing our proprietary Central Engagement Platform ('CEP'), our objective is to create a 'single source of truth' for data in the business, building trust and consistency in customer and financial reporting. It is secured with best-in-class data management and access control, including the encryption of sensitive data.

Scalable data solutions

The platform is also being used to collate data regarding venue footfall, food and beverage sales, and employee holidays, in order to predict appropriate levels of staffing, ensuring that both customers and colleagues have an optimal experience in venues. In future, the outputs of employee engagement surveys and actions from audits will be added, which will be visible through analytics reporting, giving managers guidance on where to focus their time to improve their club's working environment.

> **"As technology evolves, there is opportunity to review how we use our data to better inform our teams. A root and branch review of the data available, what we use it for and how we present this information to our teams in a simple, easy to digest and act-upon manner is at the heart of our immediate strategy, helping to better focus our efforts and resource on higher risk players."**

Adele Farrell, Director of Compliance

Data

With multiple brands, both digital and land-based, operating in multiple jurisdictions, we have access to a wealth of information covering stakeholder behaviours in all aspects of the business. We want to utilise this information to enable data driven decision-making across the Group.

Venue and digital brands

Currently, the CEP draws on 35 data sets from Mecca, Grosvenor, and the digital brands in the UK, on everything from customer play on slot machines to employees' annual leave. However, it is a scalable solution, ready to support Rank's future growth into new brands, products, and territories.

Helping track problem gambling

Having consolidated all the information in a centralised system, we are then able to process and analyse that data. From here we can build profiles of business entities and present a holistic picture of the activity in that area.

For customers, this can include creating Single Customer Views ('SCVs') which present a crossi-channel view of their activity, including their favourite games, total spend in the last month, and whether they are considered at risk of problem gambling.

Data sets from venue and digital brands

Business intelligence

Machine learning

Builds playing profiles

Triggers customer interactions

Streaming analytics

Data science

A flexible, growing system

We continue to build the capabilities of the CEP and develop new models to automate processes. It is a flexible, growing system and new data sources will be added over the coming months, creating a one-stop-shop for Rank's reporting and analytics. From a safer gambling perspective, this means we will ensure that the experience of an individual customer, when they play in any of our venues or online sites, will reflect the learnings gathered from the CEP.

Ongoing monitoring

The final stage is creating models that trigger actions based on pre-defined rules. As safer gambling is such a central focus for Rank, we have already developed models to improve efficiency in detecting at-risk customers.

The CEP monitors customers playing in our Grosvenor venues, and when an individual exceeds a pre-determined spend threshold, an alert is sent to the management system of that casino. This triggers an interaction by a member of the team with that customer, regarding their level of spend.

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Safer gambling Continued

Employee interactions

As significant as introducing and integrating the most effective technology and insights into our venues, is the nurturing and reinforcement of a safer gambling culture to support it. In order to determine if an interaction is required, employees in venues use their insight and personal knowledge of customers, together with the data provided to them by our models (as aforementioned).

Reflecting the importance of colleague sentiment on how seriously the Group takes safer gambling, we measure this twice a year through our employee surveys. It is a Key Performance Indicator (KPI) linked to executive remuneration. Our latest pulse survey of employees demonstrated a clear feeling that the business does take safer gambling seriously, with a score of +53, in the target range of +50 to +55.

We continue to update our approach to customer interactions based on our ever-evolving understanding of problem gambling behaviours. Upon identifying a customer for interaction, the team will react in a timely manner and ensure that a conversation is broached with that individual before they leave the venue. Team members will check on the customer's wellbeing and query their comfort with the level of gambling at which they are playing.

We introduced additional controls and reporting up to the general managers, regional managers, or the Leadership team. Any conversations with casino customers that result in an affordability assessment will be tracked and the outcomes of that assessment documented. Where we have concerns about a customer's play and wish to speak to them, we retain the ability as operator to suspend their account or set limits until such time as that conversation has taken place.

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

To implement and sustain our new safer gambling ways of working at our Grosvenor venues, we have completed multiple workshops and face-to-face trainings across the UK. 3,000 employees have been trained on courses relevant to their role, and just over 10,000 courses were completed by our leadership and venues teams.

In Spain, the legislative requirements for measures to protect customers are far less 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. For our venues' employees, although there is less regulation on customer interventions, we have developed a new protocol on how to support customers and will be conducting in-depth training in 2023/24 to sharpen focus in this area.

For our digital brands in Spain, we are similarly committed to going beyond the regulatory requirements. We have risk detection measures in place. When an at-risk customer is identified, the safer gambling team will reach out directly to assess the situation. We make individuals aware of our safer gambling resources, recommend limit setting based on affordability, and will move to suspend their account if they are unable to cope and play within their means.

2.1hrs

Average number of hours of safer gambling training completed per employee

100%

Percentage of employees who completed mandatory safer gambling training on e-learning platform

Case study: GamCare Training

In the past year, we have invested significantly in specialised safer gambling training for our colleagues. From May to December 2022, in partnership with the charity GamCare, we delivered customised training to c.1,200 employees from across Mecca, Grosvenor and the UK digital business. The intention was to embed and enhance ownership of and accountability for promoting safe gambling behaviour. There were two tiers of training, designed to provide the understanding required for different roles.

The Gold Level training was a one-day intermediate level course, focused on Social Responsibility and Interaction. The objective was to significantly increase the number of our colleagues who have the ability to spot markers of harm, initiate the first interactions, signpost support, and judge whether to pass customers on to more skilled colleagues. Frontline customer-facing team members, such as Bingo Chat Hosts, Duty Managers and Cashiers, undertook the Gold Level training, as they are well placed to recognise differences in customers' patterns of play.

A second, more in-depth training was delivered to colleagues responsible for escalated safer gambling conversations, including Grosvenor venues' colleagues, members of the High Value Customer team, and Mecca General Managers. This Platinum Level advanced two-day course focused on Motivating Behaviour Change. Participants were taught 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.

The response from participating colleagues has been excellent, with feedback reflecting a greater appreciation for the importance of safer gambling and a much greater understanding of how to approach customers. Colleagues have reported greater confidence to identify and talk to vulnerable customers following the training (17% and 18% increase respectively), and greater awareness of tools they can use to encourage safer gambling (19% increase). Significantly, Mecca colleagues stated they have safer gambling conversations more often (14% increase on most days or more often).

There is continual opportunity to evolve our teams' understanding of safer gambling, to build on the delivery of the GamCare training to ensure it is kept alive among colleagues who have attended, and to provide further training that will be an important part of embedding and sustaining the culture.

"I've always thought about the financial aspect of safer gambling (i.e. people spending more than they can afford/are comfortable with), however this training has made me realise that safer gambling is more effective when it is able to be discussed openly and without judgement."

Grosvenor Gold Level participant

"I have started to implement more motivational interviewing to safer gambling interactions to make the customer feel more at ease. I'm finding this makes those interactions run more smoothly."

Interactive Platinum Level participant

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Safeguarding minors and vulnerable customers

We have a firm responsibility to prevent underage play, and to protect our customers from harm, particularly if they are more vulnerable. This reflects not only our requirement to comply with the UK Gambling Commission's Licence Conditions and Codes of Practice ('LCCP'), but also our values as a socially responsible business.

Preventing underage play

A constant consideration in our marketing is to ensure that communications or advertising are not pitched in a way that would appeal to children or young people. We take measures to ensure that neither our promotional messages, nor the products themselves are targeting young consumers, and we set that bar high at anyone under the age of 25. As part of the due diligence for the opening of a new venue, we conduct local area risk assessments. This ensures appropriate decision-making and effective risk mitigation for locations that might be close to schools, youth facilities or addiction treatment centres.

We employ a number of methods in our venues to prevent underage individuals gaining admission. Within Grosvenor, our registration policy, IDScan technology, CCTV and presence of supervisors limit the risk of under-18s entering the premises.

At Mecca, 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.

We take action if there are unlawful attempts to enter our venues. In the UK, our casino and bingo halls 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.

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.

In Spain, signs on entry to venues make clear that individuals must be over 18 in order to be admitted. It is mandatory for all customers to show their identification to ensure that the entrance to gambling venues is forbidden to minors. This also applies to any person registered at the Regulators' Registry of 'persons prohibited to entry in gambling establishments'. The data from the Registry is downloaded daily to ensure we are able to fulfil this requirement.

For our UK digital business, we use third-party credit reference databases to check and validate customer registration details; this check is aimed at preventing under-18s from gambling on our sites. We also recognise that under-25s are potentially subject to a range of significant life changes that could make them more vulnerable than those in higher age brackets. We factor in the age of our customers as part of our affordability model and apply automatic deposit limits for all customers who are under 25. For our Spanish digital business, the age verification process is conducted in conjunction with the regulator.

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

1%
Percentage of customers who are under 25 with whom we have had a safer gambling interaction (UK digital)

£576k
Total Research, Education and Treatment ('RET') contribution (UK operations)

Protecting vulnerable customers

Our Markers of Harm model assists in safeguarding vulnerable customers. As highlighted above, the model uses demographic, transactional and behavioural data, and known markers of harm to assess customers, and any individual that scores in the high-risk category will not receive any marketing from any of our brands.

At Grosvenor we have taken a number of significant steps in relation to vulnerability. We have updated the safer gambling policy to make it clearer. This includes our approach to identifying potentially vulnerable individuals, and we have provided complementary training for our employees on how to manage a situation like this, should it arise.

We have processes in place to ensure we take the appropriate action where concerns about vulnerability are identified. These include customer referrals via a 'warm' transfer to GamCare for additional support resources and, in cases where concerns identify that the customer may be at immediate risk of harm, colleagues are trained to contact the police to request a welfare check.

Rank also requires that all colleagues understand their responsibilities relating to the protection of vulnerable customers. We recognise changes in customers' circumstances when conducting interactions, particularly life events, changes to financial situation and any medical issues our customers bring to our attention. Any potential or known vulnerabilities are recorded on the customer's account and taken into consideration when assessing their play.

In Spain, we received specific guidance from a safer gambling specialist on dealing with vulnerable customers. There is a particular focus on the approach to customers in crisis, including those with drug addiction issues or those at risk of suicide.

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Customer privacy and data security

Data protection

It is critical that we protect our customers' privacy and keep their data secure. As such, we must maintain clear accountability of 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'), cyber security, security governance, ethical hacking and DevSecOps

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 puts in place all data security protocols and monthly reports are provided to the Group DPO.

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 ICO and PCI-DSS regulations.

We continually monitor the landscape for incoming legislation to ensure that Rank remains ahead of the curve and is able to meet all regulatory requirements. Furthermore, regulations on data privacy vary dependent on jurisdiction. 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. Last year, we committed to embedding the Information Commissioner's Office's ('ICO') Accountability Framework into the business; this year we focused on updating all our processes in line with the framework, and ensuring we meet all the requirements at a granular business level.

Employee awareness

Our data protection policies provide direction on all data handling matters, including user rights, data retention, data sharing and security. These policies are reviewed regularly to ensure they align with changes in regulation, and all employees must adhere to these stated procedures.

We require colleagues to complete a compulsory information security induction as well as annual data protection and information security refresher training. Data protection training is included in the welcome pack for all new employees in Spain as well. Further bespoke training on data protection by design and default is provided to colleagues responsible for product development, and we have added some more targeted training for high-risk roles. This year all personnel in our IT project office completed enhanced training on recognising data protection risks and conducting data protection assessments.

Awareness campaigns based on localities are in place, such as office-based posters reminding our team 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. All team members are required to engage with security forums and attend security expos and maintain their own development and accreditations.

This year, we introduced a new process for reporting of data breaches. The objectives were to improve ease of reporting and to encourage people to report near misses. Reporting near miss data breach incidents should 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.

0.9

Number of hours per employee who have undertaken data protection and security training

97%

Percentage of colleagues who have undertaken data security training

Zero

Statutory report of personal data breach to the regulator

IT security

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), multi-factor authentication, firewalls, encryption, role-based access controls, end point protection, intrusion detection/prevention, and employee education. These measures are aligned with industry best practice.

A managed service Security Operations Centre is in place, monitoring data interactions by users and devices across the Rank estate. This then reports any activity of concern into our Information Security Team, ready for further investigation.

To ensure the effectiveness of our systems, we undertake regular audits and assessments. Vulnerability audits 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. We also run formal risk-assessment programmes and tooling, with scoring processes built around them to suitably advise the Group's Risk Committee. Risk registers are reviewed regularly, with risk acceptance, and mitigations monitored and updated as required. The lifecycle of the Risk Register means that emerging risks are identified and prioritised alongside existing risk mitigation actions and areas of improvement.

Regular project-specific or change-management-driven penetration testing is carried out as well as routine internal and external penetration testing programmes. The ethical hacking team runs internal vulnerability analysis and regularly runs scenario-based testing and breach simulations. Should a breach occur, we have pre-approved incident-management run books which adhere to best practice and governing bodies' requirements and statutory reporting timeframes.

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Product safety and quality

Regulation of products

In accordance with regulations in the UK, Rank must ensure that the equipment it uses meets the conditions of its operating licences, both venue-based and digital. All gambling equipment and software we obtain comes via companies licensed by the Gambling Commission.

The gaming machines that we use are required to comply with specific Commission technical standards, which relate to game features, display notices and general machine operation. The requirements vary by gaming machine. In addition, the Gambling Commission has set technical standards for remote gambling systems that detail the specific technical standards and the security requirements that licensed remote gambling operators and gambling software operators need to meet.

This year, a focus for our product teams in our UK venues has been implementing the Betting and Gaming Council's Casino Slot Player Protection Code of Conduct. Requirements included enabling customers to set their own time and spend limits on slot machines, which allows the machine to remind customers, via pop up messages at set intervals, how long they have been playing and/or how much money they have spent.

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 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)
A key requirement of the Remote Gambling Software and Technical Standards ('RTS') and testing strategy for compliance with the RTS is that remote gambling licence holders submit games test results and RNG test results to the Gambling Commission. This provides assurance that new games (or major updates of games) comply with the 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 beverages.

In Spain, our Compliance Manager conducts audits of the venues every three months, to ensure that the licences on slot machines are valid. All gambling products installed in our venues are certified and in accordance with regional regulation, and each machine must have its individual homologation paper and fulfil the legal Return to Player ('RTP') rate.

Product performance
Monitoring the performance of our products is critical to delivering a seamless player experience for our customers and ensuring that our games are operating in accordance with regulatory requirements. Across our brands, online and in venue, we track performance of our equipment to alert us to any potential issues as quickly as possible. This allows us to take active steps to maintain performance levels.

Digital games in the UK
For our UK digital business, all suppliers are required to send updates on the performance of the gambling software they provide. This tells us whether a game is under or over performing. The Return to Player ('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.

When a game does present an issue, the information is passed to the relevant team and the game will 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.

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

> "For us, it is about offering fun games that allow our customers to have an entertaining experience. We don't want customers to speed through games, but to be engaged and enjoy playing on our sites and to feel comfortable and safe when they do so."
>
> **Cyrus Moreno,**
> **Head of Game Strategy**

Venue games
Testing of physical games is done by each venue through a task management system. Operating standards for all hardware are in place for Mecca and Grosvenor to eliminate faults, such as broken buttons or glitches in machines. Our physical gaming machines have fault logging to highlight and measure any product quality issues. We also have daily slots 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.

For table games in Grosvenor, shuffle machines are cleaned and checked weekly. We check the front and back of playing cards daily to ensure they are in good condition, and 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 reviewed on an ad hoc or as needed basis. Win percentages are reviewed regularly to monitor performance.

To ensure each roulette wheel is operating fairly and correctly, we clean and balance the wheels daily, conduct weekly drop zone tests, 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. To improve oversight of wheel game performance across the Group, the data from wheels in all venues can now be accessed centrally on one system. Our central team can therefore detect wheel imbalances and alert the relevant venue's team to investigate.

As with digital, the performance of machines and other equipment in venues informs our longer-term strategy in the types of products and machines that we want to bring on board and the suppliers with whom we want to work.

Similar procedures are in place and testing is completed in respect of machines in our Spanish venues. To guarantee they are operated honestly, slot machines in Enracha venues are subject to internal and external tests by the company that markets them or by the Spanish gambling regulator, General Directorate for the Regulation of Gaming Activities ('DGOJ').

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Ethical marketing

Compliance of advertising

Promoting our brands requires a careful balance of effective advertising and ensuring that we are only doing so responsibly. In the UK there are clear regulations around advertising of gambling products, which ensure communications reach the intended audience and do not glamorise gambling or indicate that it can resolve financial or loneliness issues. All operators must comply with the relevant consumer protection laws, licensing requirements and the Advertising Standards Authority ('ASA') Codes. The ASA guidelines were updated in October 2022, which has sharpened focus on the imagery used externally to make sure that it does not appeal to children. As a member of the BGC, Rank also follows the industry body's Code for Responsible Advertising.

To ensure that all promotional materials that we develop are compliant, our team members are aware of the codes that marketing activities should comply with, and any new or materially different materials are reviewed by our Compliance Team before release, to assess the tone and intent and that they are not contravening any regulations. To improve efficiency during the process, we ensure that every material is reviewed, and create transparency in the audit flow; we have built compliance into our above-the-line advertising marketing traffic flows. Broadcast advertisements must also be reviewed to ensure they are compliant ahead of submission to Clearcast, a non-governmental organisation that pre-approves most television advertising in the UK. For more details, visit the Clearcast website at www.clearcast.co.uk

Where we work with affiliates who conduct advertising on our behalf, these companies are subject to due diligence when they are onboarded. They are required to comply with our terms and conditions (which include a requirement to comply with all applicable laws and regulations) and approval processes. We continue to enhance our approach to monitoring their activity to ensure compliance.

In Spain, 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, promotional bonuses for new customers are not permitted and advertising on TV and radio is restricted. We strictly adhere to all relevant legislation.

Safer gambling and advertising

Safer gambling is a critical consideration in our advertising and we are committed to providing consistent and effective safer gambling messaging when we market our products. In the UK, in compliance with BGC commitments, and in addition to the safer gambling messaging which must be included in all advertisements, 20% of our 'above the line' media expenditure in the UK is reserved for safer gambling messaging on campaigns. To keep our customers safe, we suppress any marketing communications to those customers who have self-excluded.

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, whilst 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.

1

Upheld breaches of advertising codes

£1.1m

Total spend on television and radio safer gambling advertising (Mecca and Grosvenor)

456

Number of accidents (UK venues)

1

Number of accidents reported under RIDDOR (UK venues)

6,597

Number of colleagues that completed Health and Safety training (excludes Spanish operations)

Health and safety

As an operator of physical venues across the UK and Spain, it is important we take all necessary measures to ensure the physical health and safety ('H&S') of our customers and colleagues. We are committed to achieving the highest standards in H&S across the Group and continue to improve and update our processes in line with the local government guidance and approved codes of practice.

In the UK, our Head of H&S is responsible for overseeing H&S across all the clubs and support offices, supported by the dedicated H&S team, whilst the General Managers of each venue are responsible for ensuring their operations meet the requisite standards. The H&S team visits every venue and support office twice a year to conduct an audit of operations. Additional reviews are carried out for any venue that is identified (during the biannual audits) as requiring extra support, guidance or training concerning occupational H&S. Food safety audits are also conducted twice a year by an accredited third-party provider. Our Spanish business aligns to the same framework, with local health and safety accountability and monthly reports being provided to the Head of H&S. Results of the audits are circulated to the relevant venue's leadership team, completion of resulting actions is monitored and any significant issues are escalated and followed up by management teams, with the assistance of specialist external consultants where needed.

H&S works closely with the Facilities team; they ensure that ongoing H&S-related projects are completed in a timely manner, and plant and equipment maintenance and compliance is included in the venue audits. As part of our carbon reduction activities, we have contracted a third party to assess energy use of our assets in venues (for more details, please see the Environment section of this report on pages 35-46). Using harmonics, we will monitor asset performance and predict when an asset is likely to fail. This will improve our ability to carry out preventative maintenance of equipment.

Our H&S policies are reviewed on an annual basis and are assured by our prime authority, Wakefield Council. In 2023/24, as part of the annual review, we aim to streamline these policies and provide greater clarity on the governance processes.

To improve efficiency and oversight, we have introduced a new safety management system for the UK venues which amalgamates all our previously disparate platforms into one online portal. This has streamlined and improved the data collection and management process, creating a singular dashboard with all relevant information.

On a day-to-day basis, we rely upon our colleagues to observe the correct safety procedures, and percentage of workforce that has completed H&S training is thus a Key Performance Indicator for the entire Group. Our online training platform, Springboard, is available to employees in all locations. Employees must complete H&S training as part of their onboarding process, with refresher training taking place annually. Ad-hoc training is also carried out by the H&S team, and senior personnel in venues must complete extensive training to understand the site-specific H&S requirements and processes.

Our Head of H&S reports to the Risk Committee on a monthly basis, providing audit data, updates on the training KPI, and Planned Preventative Maintenance ('PPM') reports. A report is also produced for the Audit Committee twice a year or more frequently, as required.

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Customer service

Interactions with our customers are a key enabler to improving our service and turning player engagement into a competitive advantage. As such, it is important that customers have clear lines of communication to feed back to the business and that they are provided with any support they require in a timely and friendly manner.

The customer service team can be contacted via live chat, phone or email. On our Mecca sites, the online chat room feature always has a Chat Host present, not only to monitor play, but also to converse with customers.

Our customer champions are the frontline agents trained to deal with most complaints; however, where an issue is more complex, it is escalated to the second line team. Customers can also submit complaints directly to the Director's Resolution Office. We have introduced a chatbox to deal with everyday queries, which frees up time to deal with more complex concerns.

When a new employee joins our UK customer service team, they go through our Academy, a 12-week training programme which gives an introduction to the company and its products, as well as teaching the skills required in their new role. Furthermore, all our frontline colleagues receive safer gambling training to improve their ability to recognise vulnerabilities in individuals that contact the customer service team and, if they arise, to be able to handle 'threat to life' situations.

Our aim is to effectively utilise the feedback we receive to implement improvements and efficiencies in the way we deliver our services to customers. Our quality and monitoring function assesses all customer contact and gives direct feedback to team members. We use a case management system to categorise complaints, which enables us to track patterns and identify any common or reoccurring issues that we need to address. Following an interaction, we send customers a survey via email, asking them how they rate the service, whether we resolved the issue and welcoming further comments. The data from this informs our Net Promoter Score ('NPS') and Customer Satisfaction ('CSAT') Score, and we use text analysis to draw out insights from this feedback. We use all this data to reveal any larger issues for root cause analysis and to understand how we can find a resolution. The findings from the feedback gathered are shared with the relevant teams internally, in order to drive continuous improvement.

+78

Mecca Venues Net Promoter Score

+57

Grosvenor Venues Net Promoter Score

+36

Enracha Venues Net Promoter Score

141

Customer complaints to Directors' Resolution Office (UK operations)

Case study
The power of our Mecca chat rooms!

In March this year, we truly saw the value of the community in our online Mecca chat rooms. At 5:20pm on 1 March, the Chat Host for a Gold Bingo game alerted the support team that two messages on the chat room had been posted: 'some1 help me', 'my mummy fell down'. Our Community Manager downed tools and jumped into the chat room. At the time, there were 551 players in our Goldrush bingo room. Immediately, every single player fell silent, allowing our colleague to do their job and discover what was happening.

It transpired a player, who had been engaging in the chat room, had collapsed and was unresponsive. Her children were in a state of panic, but her nine-year-old daughter knew that her mum chatted online whilst playing bingo, so came to us for help.

Our Community Manger communicated with and comforted the player's daughter via the chat, at the same time as another colleague dialled the emergency services. A five-way conversation took place between the 999 operator, paramedics, our two Mecca colleagues and the young girl, wherein we aided her and sent an ambulance to the home. We stayed in touch in our chat room until we knew the paramedics had arrived and that the daughters and mother were safe and well.

We are very proud of our team's quick-thinking response to this incident, but also of our community of bingo players in the chat room who immediately grasped the gravity of the situation and paused play. This really demonstrated the community spirit at Mecca and the value of our technology.

> "Further into the evening, I called the customer to check in with her and see how she was and how her daughter was doing. The customer was overwhelmed at the support we provided to her daughter, and said she could never thank us enough for saving her life – to which I said that of course the real hero was her nine-year-old daughter!"

Bingo Community Manager

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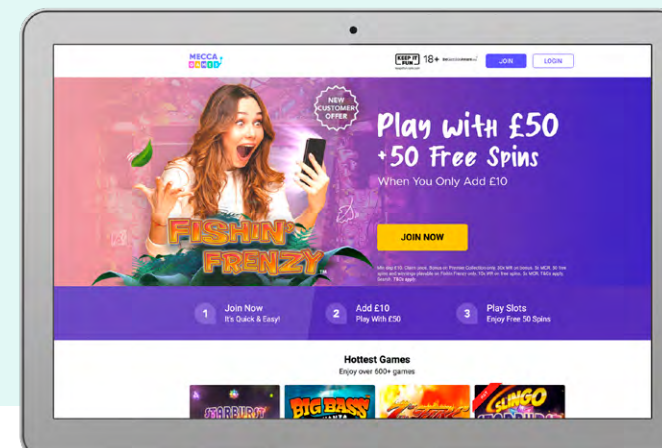
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Delivering a high quality of service for our customers depends on our ability to provide a positive working environment for our colleagues.

As such, driving engagement, providing development opportunities, and ensuring all employees are treated fairly and given the support they require, are all key commitments for our business.

Living and breathing our culture and behaviours at all levels sets the tone and facilitates a positive overall colleague experience. Our STARS values are integral to how we all do our jobs and we regularly recognise colleagues through our STARS values awards.

Material issues

Diversity and inclusion

Health and safety

Employee engagement

Talent management

Employee wellbeing benefits

Employee training and development

KPIs

+14

Employee Net Promoter Score (eNPS)

35%

Percentage of women in senior roles

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This year, we have taken a step back to review the overall colleague journey at Rank, our policies and our practices, and have developed a clear People and Culture plan, with key areas of focus.

Foremost, we have streamlined the organisation of our People and Cuture function to better reflect how we deliver value for our employees.

The function is divided into three areas, People Experience Partnering, and the supporting centres of excellence in Talent and Reward, Performance & Operations. This ensures there is a clear focus on the strategic elements of People Management and effective executive oversight of all elements of the people experience across the entire Group.

We have developed a comprehensive view of the employee lifecycle, from the attraction and recruitment of colleagues through to individuals the business. This has enabled us to interrogate our existing practices and assess what is working well and where there is room for improvement. As a result, we have created an action list for recruitment, onboarding, and the development of employees. We are also developing a new Employee Value Proposition ('EVP') which will improve our ability to attract, develop and retain talent at Rank.

To support our effectiveness as a team and introduce efficiencies, we employ technological solutions where applicable. Our employee engagement platform, Peakon, runs our employee surveys and allows us to assess the data outputs and create and monitor action plans. This year, we deployed our new HR platform, Dayforce, which combines all facets of people management in one location. We are continuing to improve our oversight of people data and use it to drive decision-making across the business.

"It is important that everything we do in People and Culture supports the other agendas in the business. That is why we have focused on having the right foundations in place for people management, ensuring our processes are fit for purpose and that our systems have the capacity to keep things running smoothly. From here, using the learnings we are collecting, and ensuring we act and behave with our values at the heart of everything, we are building on those foundations to continuously improve the employee experience."

Hazel Boyle,
Chief People Officer

Our streamlined organisation of the People and Culture function

Chief People Officer
Hazel Boyle

Talent	People Experience Partnering	People Experience Partnering	People Experience Partnering	Reward, Performance & Operations
Group HR Director				**Reward, Performance & Operations Director**
Talent Acquisition	Mecca venues	Grosvenor venues	Enracha venues	Reward
Talent Development			UK digital	People Operations Administration & Experience
Learning & Development (Venues)			Spanish digital	Payroll
Culture, Engagement & Communications				Data & Analytics

The employee journey at Rank

Find me	**Hire** me	**Welcome** me	**Grow** me	**Grow** me more	**Say** goodbye
Careers website	Hiring manager training	Induction	Policy & procedure		Exit interviews
Social media		Onboarding	Pay & benefits		Wellbeing
Job fairs	Recruitment process & experience		Incentivisation		Alumni
LinkedIn & Glassdoor	Contracts & T&Cs		Wellbeing		Redundancy & retirement
Community communications	Testing & assessment		Risk, compliance & safer gambling		
Employer brand	The offer		Customer service excellence		
	The experience		Performance & feedback		
			Training, learning & education		
			Succession & progression		

Culture & values — **Great management & leadership the Rank way** — **Communication & listening** — **Enable through technology** — **Equality, Diversity & Inclusion**

Service — **Teamwork** — **Ambition** — **Responsibility** — **Solutions**

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Training and development

Leadership capability

Sustainable growth is reliant upon the direction of leadership. As such, it is critical that we have effective leaders in place equipped with the appropriate skills and understanding to drive the business forwards. This not only requires having the right people in the right roles now, but also developing a pipeline of talent to secure future success.

Annual Board skills reviews are conducted to assess knowledge and experience. Board members receive regular corporate governance and industry updates, with particular focus on safer gambling and, increasingly, ESG matters. Bespoke coaching is offered to senior management to enable further growth in expertise. This is targeted at those we believe have succession potential, and coaches are carefully chosen and matched to ensure there is personal chemistry and relevant expertise.

The Nominations Committee maintain succession plans for the Board, Executive Committee and other members of the Senior Leadership Team. Embedded into the successor assessment is a leadership capability framework. This planning is critical to ensure that there will be continuity of capability in key roles.

To support the development of future leaders, we are continuing to utilise data to identify talent and inform the development opportunities required. We created a bespoke development programme for individuals across the business who have been identified for their leadership potential. 'Leading at Rank' and 'Managing at Rank' are delivered across the business to bring a unified understanding and language to those in leadership and management roles.

This year, we have delivered these programmes in some of our international locations, face-to-face as well as to mixed cohorts from across the business. In the UK digital business this year, we have launched an Internal Mentoring Programme specifically to support those individuals identified as high potential. The aim of the programme is to further develop their leadership skills. Colleagues were invited to apply for the programme, to either provide or receive mentorship.

Our 25 pairs of mentees and mentors represent colleagues from our UK and Spanish digital businesses and from our support offices, with 16 female mentees and 11 female mentors. If this proves an effective tool for development, we plan to roll it out to other parts of the Group.

Development opportunities

Equipping people with the right tools to fulfil the duties of their roles, as well as the mandatory training to operate according to best practice, is a focus for every company. However, to improve engagement, to motivate people to excel, and to be seen as a great place to work, offering career development opportunities is crucial.

Available to all employees, our e-learning platform offers over 700 courses in professional and personal skills development. Apprenticeships are used as a tool to develop and upskill individuals within the business or prepare them for management roles. We have a formal process through which colleagues can apply for support to undertake external training, such as mini-MBAs and project management courses.

In Spain, our training platform, Campus, gives employees access to different soft skill courses to enrol in. The platform also acts as a means of talent detection, identifying colleagues that have obtained strong results on completion of training courses. For those individuals who have been recognised for their leadership potential, Silver Talent is a scheme intended to provide professional development of skills and technical abilities. Face-to-face sessions are also conducted, covering necessary skills to support employee progression. By developing our existing colleagues, we have a strong pool of candidates for internal promotion.

We have incorporated training opportunities into our recruitment strategy. Our Gaming Academies are six-week intensive training programmes for individuals that want to learn dealing-based casino games. We recruit people specifically for these courses, providing skilled employment and free training.
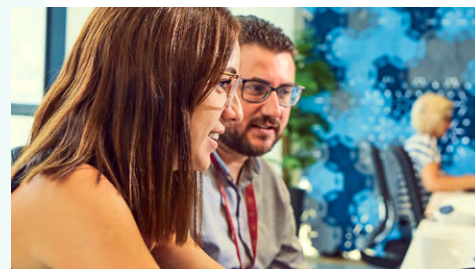
34%

Percentage of management roles on leadership training programmes

418

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

68

Number of apprenticeships started in the year

93,692hrs

Number of hours of voluntary training completed

Case study: Interview with Cheryl Gifford, Mecca Marketing Director

What has been your career trajectory at Rank?

I have taken on many roles at Rank. Back when I first joined the business, I was working as a Customer Services Manager in one of our venues for several years. I then applied to be a General Manager and worked at various locations across the country managing venues. When the opportunity arose to cover maternity leave for an Area Manager, I transitioned to the support office, and having worked in a few different teams since then, I am now heading up the marketing function for Mecca.

What support have you received as you progressed through the business?

If you demonstrate drive and hard work, the business is always keen to reward that ambition and invest time in you. I have really benefitted from the mentoring and guidance of colleagues throughout my career at Rank. In each new role I took on, I was moving to a different working environment, and in each location and part of the business I always received support from my managers.

I would say the best thing was being offered opportunities that made me feel uncomfortable and stretched my abilities at the time, because that challenged my perception of what I was capable of and ultimately was instrumental for my development. Even now, I am given the opportunities to push myself, and so I continue to develop and learn new skills.

What is it like working at Rank?

The best thing about Rank is that we are a people business. I have been here as long as I have because we have a fantastic culture and the business does right by its people, both employees and customers.

Safer gambling is at the heart of what we do and we make sure we go above the minimum requirements for protecting players. From a responsibility perspective, I do not think there is another company out there that takes it more seriously than Rank. It is a core value for the business and something we do very well.

And internally, employees are looked after and there are always colleagues willing to help if you want the opportunity to progress in the business. My intention when I first joined was to stay for just one year to get some work experience. But when I joined, I fell in love with the Mecca business, and that's why I am still here 25 years later!

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Equality, diversity and inclusion

Our continued focus is on creating the right culture and behaviours at Rank. To foster equality, diversity and inclusion ('ED&I') in our business, we have formulated a plan that focuses on four stated aims over the next three years:

1. **Deliver an inclusive and diverse environment that contributes to us being internally and externally recognised as an admired employer**

2. **Create a colleague experience that both attracts and retains talent, regardless of our location**

3. **Ensure we continue to educate, grow, and develop our colleagues and that any perceived/actual barriers to career progression are removed**

4. **Make equity integral to how we do business**

We are continuously reviewing our progress against these aims as the business evolves, providing updates to the Nominations Committee and Board, as required. To drive progress this year, we focused on simplifying our strategy and we plan to establish clarity of purpose, reviewing the quality of the available data, with a view to improving how we measure ED&I, and actioning feedback from the EOS as it relates to these objectives.

1.
Deliver an inclusive and diverse environment that contributes to us being internally and externally recognised as an admired employer
In developing a pipeline of talent to support succession planning, we also want to ensure this is an inclusive strategy.

In May, we introduced the Career Accelerator Programme ('CAP'). The programme was designed by our Talent Acquisition Business Partner, following her participation in an external course which aimed to support women in leadership positions to progress. CAP was offered to all female colleagues currently in or seeking to enter management roles. Taking place across seven weeks, we sought to make it as accessible as possible by conducting it via webinars and at times that fitted with varying time zones and shift patterns. Across the group, 110 women put themselves forward to take part, with feedback from the first sessions proving very positive and highlighting the value of this programme for women in the business.

The importance of ED&I must be understood by every level of the business. This year, we delivered 7,200 hours of ED&I learning through a mixture of events, webinars, online learning and forums. Whilst we continue to educate our colleagues, we also regularly review our leaders and managers to ensure that they are acting and leading inclusively.

"The programme has been good to reflect on. I've been using all the exercises and specifically the 'I can'."

Career Accelerator Programme participant

Case study: Elevating women in leadership

To facilitate progression, we are keen to offer our female colleagues opportunities to develop their skillsets and knowledge. This year, our Talent Acquisition Business Partner, Iona Zaharieva, was nominated by her manager for the LHH Evaluating Women programme.

The programme was aimed at women looking to take the next step in their careers. It took place over the course of eight months, enabling participants to implement new learnings in their roles and report back to the course group on their progress.

The four modules covered a breadth of topics, including career planning, networking, self-advocacy and being strategic. It also tackled differences in expectations for women and men in the workplace, and how to overcome gendered barriers.

Following her completion of the programme, Iona was inspired to create her own internal programme for colleagues. The Career Accelerator Programme ('CAP') was launched in May 2023 and was offered to women in management or those aiming to step up into a managing role.

"The programme was a fantastic experience. I learnt so much and have a much greater clarity of purpose. The module on being strategic really resonated with me, especially as it related to viewing my role in the wider context of the company and the opportunities this presented for my career. Introducing a programme at Rank that could offer these same learnings to my colleagues felt very important and I'm so pleased at the response we have had to the project so far."

Iona Zaharieva, Talent Acquisition Business Partner

2.
Create a colleague experience that both attracts and retains talent, regardless of our location
Our ED&I policies cover the wide-ranging need of our workforce. We provide a variety of family support policies, including flexible working and enhanced maternity leave pay for women in leadership, management, or pathway into senior management roles. The policies seek to enhance the working lives of colleagues, by offering alternative working patterns to help them strike a balance between work and personal commitments.

As part of the development of our new Employee Value Proposition ('EVP'), we are conducting a thorough policy review to improve equality of opportunity across the different locations in which we operate.

This year, we introduced our new three-year ED&I strategy. In reviewing this plan, we created four focus areas: Recruitment, Talent Development, Communication, and Culture & Engagement. There are key actions in each of the areas that determine our focus for the coming year. Many of the actions are already in progress, including female representation at senior level.

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Equality, diversity and inclusion Continued

3.
Ensure we continue to educate, grow, and develop our colleagues and that any perceived/actual barriers to career progression are removed

At Rank, we recognise the importance of and celebrate diversity within our workforce. We take a zero-tolerance approach to discrimination of any kind, and this in enshrined in our Group policies.

To ensure there are no barriers to progression for individuals from underrepresented groups, several initiatives are in place to support employees' development. We create personal development plans ('PDP'), which we review on a quarterly basis. To support the development outlined in the PDPs, we offer mentoring and enable individuals to undertake external courses.

We acknowledge that the data we gleaned predominantly captures our workforce in the UK, and we recognise the restrictions on our ability to measure representation in other jurisdictions, due to local legislation. Nevertheless, we want to improve the quality of ED&I data and aim to capture that local information where possible. We have developed a draft data dashboard which captures representation in the workforce by demographic. This which will be used to provide the Executive Committee, Board and wider business with updates on the Group's ED&I performance.

Case study: 'Women to Watch'

We are immensely proud that one of our colleagues featured in the WiHTL Women to Watch and Role Models for Inclusion in Hospitality, Travel and Leisure Index. Hazel Boyle, Chief People Officer, was named as one of the Women to Watch in the sector.

Women to Watch and Role Models for Inclusion in Hospitality, Travel and Leisure
Woman to Watch 2022
Hazel Boyle
The Rank Group Plc
MBS WiHTL

"My drive and determination have set me up well. I'm not from a privileged background but I have progressed because of my values, work ethic, and by being a good person. I have taken control of my destiny, but also been specific about what I wanted to achieve – I've put in the hours, taken risks and if I can do it, anyone can. After 25 years in HR I can now give my time back, I can coach, mentor and advocate equal opportunity and promote tomorrow's women."

Source: Women to Watch and Role Models for Inclusion in Hospitality, Travel and Leisure Index: The 2022 Edition from WiHTL and The MBS Group

47%
Percentage of employees that are women

40%
Percentages of employees who are part-time

11.6% *
Gender pay gap

8.3/10 **
ED&I EOS score

* This was the median gender pay gap figure for April 2022
** This was the average engagement score across the Group for the survey conducted in October 2022

4.
Make equity integral to how we do business

All employees should feel empowered to share their feedback with the business. To facilitate this, we have six ED&I colleague groups, which represent the interests of different demographics and groups within our workforce: ED&I@Rank (incorporating religious celebrations), READ (Race, Equality and Diversity), Families@Rank (including carers), LGBTQ+ @Rank, Wellbeing@ Rank and Women@Rank. These groups meet at least twice annually and provide a forum through which employees can feel comfortable expressing their opinions about the workplace and other subjects.

Each group has an Executive sponsor, as well as a representative from each country and brand. The groups also have a Chair and Vice Chair to support the development and implementation of our approach to ED&I, including acting as and identifying role models for each of our initiatives. We have also linked up with six leading external ED&I partners: Inclusive Employers; INvolve; Women in Hospitality, Travel and Leisure ('WIHTL'); Corporate Research Forum ('CRF'); 55 Redefined; and Included. Each of these partners is actively engaging with members of our colleague network groups, providing external benchmarks, content and thought leadership.

To highlight the importance of these network groups across the business and embed ED&I into all we do at Rank, #BeYourself is a full programme of ED&I events held across the year. This year's calendar for #BeYourself included a talk on disability from British racing driver, Nicolas Hamilton, a Wellbeing at Work session hosted by a psychologist, and events to mark LGBT History Month, International Women's Day and World Religion Day.

It is important to get regular feedback from our colleagues relating to ED&I. As such, we include ED&I questions within our full Employee Opinion Survey ('EOS') and 'pulse' survey, to gauge how we are performing and understand where improvements could be made. This year, our EOS results showed improved internal perceptions on Rank's ED&I performance, with the score increasing from 8.1 to 8.3. This was reinforced externally, where we ranked in the top 25% of Gaming/Gambling companies for ED&I, via the All Index Benchmarking survey.

We will continue to drive improvements in our ED&I performance over the coming year and champion equality, diversity and inclusivity in the workplace. We have committed to continuing our series of webinars, following positive feedback from colleagues. These will cover all ED&I topics, as well as areas such as thought leadership and key business topics. We have also committed to reviewing our Global policies to better meet the needs of our diverse workforce.

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Engagement, reward and wellbeing

Reward and recognition

Providing an attractive working environment, where employees are rewarded and recognised for their work, is crucial to being an employer of choice.

In addition to competitive and fair pay, benefits on offer focus on improving employees' wellbeing. This includes, but is not limited to, access to our Employee Assistance Programme ('EAP'), ensuring employees have access to affordable quality medical care through our medical plans, and location-appropriate financial wellbeing support.

During our monthly Town Halls, we present STARS awards to employees. The STARS (which stands for our values of Service, Teamwork, Ambition, Responsibility and Solutions) awards are given to individuals or teams that have been nominated by their colleagues for demonstrating Rank's values in their work.

Spotlight: Developing our new Employee Value Proposition and the connection with our values

Work. Win. Grow.

Wherever you work across Rank, you'll be working with passionate stars who bring excitement and entertainment to millions of people around the world every day. Our culture is focused on winning the hearts and minds of our customers, both locally in venue, and online. We put their happiness, welfare and safer gambling at the heart of everything we do. Every day, we grow as individuals, as teams and as a business, in one of the fastest-growing and exciting sectors.

Knowing there is opportunity to develop our skills, to do great work in a business focused on the future, makes working at Rank the most exciting and entertaining place to work.

We recognise that there is more we can do for our existing employees and to continue bringing talented individuals into the business. Commensurate with this understanding, we have been developing Work. Win. Grow., our new Employee Value Proposition ('EVP'). The EVP is the expression of the 'deal' between an organisation and a colleague, and will capture what Rank offers and what the colleague receives in return.

The new EVP is underpinned by our existing values and behaviours. It is also focused on building a comprehensive global understanding of our business. Operating across seven locations – UK, Spain, Gibraltar, Malta, Israel, South Africa, and Mauritius – considerations must be made for the statutory provisions that employees in different locations have access to. Crucial to this has been reviewing the policies we have in place and compensation we offer, with the objective to ensure the benefits offering is equitable across our workforce, as well as making sure policies are accessible and easy to understand. By undertaking this project, we are developing the culture of Rank to meet employee expectations, improving talent attraction, engagement, and retention.

> "Our new EVP is focused on delivering an excellent employee experience, and making sure that everyone, no matter their location or role, is treated the same way. Taking this holistic view ensures that we are removing any barriers to equality of opportunity and that all our colleagues are happy and secure in their roles."
>
> **Will Winter-Smith,**
> **Reward, Performance & Operations Director**

Connect everything we do to our purpose

Our purpose
To excite and to entertain

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

Align everyone to STARS: our values and behaviours

Service	Teamwork	Ambition	Responsibility	Solutions

Deliver everything through the lens of our EVP

Work. Win. Grow

Refresh the candidate and colleague journey

Find me | **Hire** me | **Welcome** me | **Grow** me | **Grow** me more | **Say** goodbye

Engagement, reward and wellbeing Continued

Employee engagement

Working in a dynamic industry such as ours is truly exciting, and we want to make sure that is reflected in every employee's experience. Engaging with our colleagues on an ongoing basis is therefore valuable for measuring employee satisfaction and providing channels for receiving feedback.

Our Employee Opinion Survey ('EOS') is a key tool for assessing employee sentiment. We conduct the EOS twice a year, with an in-depth survey covering all aspects of working at Rank, and a 'Pulse' survey six months later that focuses on key engagement drivers. Both surveys are conducted through an online platform, Peakon, which houses all the insights collected, enabling detailed assessment of data and identification of any issues. FFollowing the EOS, we share learnings with the Executive Committee and Board, create action plans for managers, and more broadly assess the actions that need to be taken.

The results of our latest pulse survey demonstrate that engagement has improved overall, with the employee Net Promoter Score (eNPS) increasing from +7 to +14 and noticeable improvements across all areas of colleague engagement in our Grosvenor and Mecca venues.

For employees in our support offices, the intranet serves as a hub for all key colleague and company information. To improve information accessibility for our colleagues in venues, we will be introducing an employee app to allow everyone to access company information easily.

Crucial for building trust and bringing everyone along on Rank's journey, is leadership connecting with employees. Our Executive Team are not a remote body, but interact with colleagues, listen to feedback, and respond to concerns. Directors and senior management lead our Town Halls, but our colleagues are encouraged to view and contribute to these.

Employee Voice is a forum through which elected employee representatives from across the Group can speak directly with Executive Committee members. Themes from each Employee Voice meeting are extracted and we assign responsibility to specific teams to take suggestions forward or implement solutions.

Talking STARS and Leading STARS sessions are also held biannually and provide a forum for key individuals from across the business to debate issues impacting the Group. These forums supplement Employee Voice meetings, with participants selected from across our business. They are attended by Rank's Chief Executive, Chief People Officer, and other members of the Executive Committee.

As our Board help to set the strategic direction of the business, it is important they have an appreciation for the day-to-day operations of employees working in different environments across the Group. Board members make visits to our venues and conduct listening sessions with employee groups. In our non-UK businesses, we hold a monthly meeting where we give our colleagues the opportunity to ask questions.

There is a designated Non-Executive Director (NED) for workforce engagement, as part of ensuring that the Board considers the views of colleagues in their discussions and decision making. The NED is spearheading confidential listening sessions across the Group, both in person and virtually, to gather feedback from employees on how they feel about working at Rank and what is or is not working well. To raise awareness for these sessions, the NED recorded a podcast explaining their role and the purpose of workforce engagement. The NED reports formally to the Board biannually on key matters discussed in these employee listening sessions.

An open line of communication with union bodies is imperative for meeting employee expectations and minimising risk of disruption to operations. In the UK, we strive to maintain a positive relationship with the unions, hold regular meetings, and conduct annual pay reviews. In Spain, workers' representation in the company is facilitated through formal meetings, including through the Works Council, Occupational Health and Safety Committee, and ad-hoc meetings wherein a representative has raised an issue to be resolved.

Responses from colleagues on the latest pulse survey:

> **"Maybe it's my attitude towards work but I also think that the environment allows me to have a positive attitude when it comes to work. I'm very happy that I work here."**

> **"I have had an opportunity to learn, be encouraged and better myself from day one, with great support from management when I need it."**

> **"I really enjoy working here and with all the new changes currently being implemented, I can see that it's only going to get better."**

12
Number of Town Halls

Case study: You said. We did.

The feedback we collect from our employee surveys is invaluable for improving the experience of our colleagues. Across the Group this year, we have made a number of changes in response to suggestions from employees.

UK digital: launched the cultural pillars and toolkit to support teams to embed the Rank Interactive culture across all our locations; delivered first line Managing and Managing at Rank to all our managers; and held one-to-one coaching sessions and development planning workshops.

Grosvenor: added to the pre-boarding and onboarding procedure with updated and improved induction for all roles; and ran sessions for rota managers focused on delivering fair and equitable rotas.

Mecca: improved simplicity and clarity on communications around weekly activity to reduce unnecessary task in venues.

Overseas operations: held STARS (which stands for our values of Service, Teamwork, Ambition, Responsibility and Solutions) values engagement sessions across our locations; and improved communications between teams to support collaboration.

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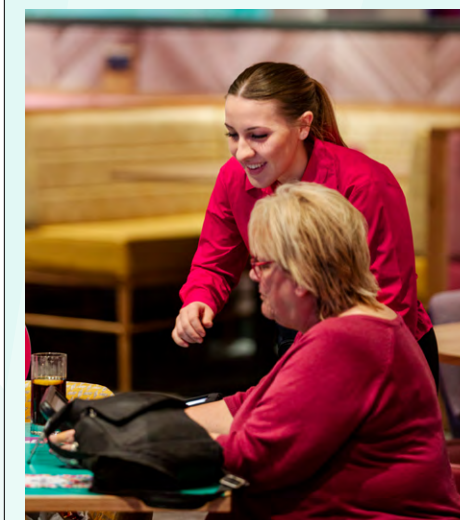
Mental health and wellbeing

Delivering a great employee experience includes safeguarding our colleagues' mental health and wellbeing. We want to provide a working environment that is both fun and supportive, and the Wellbeing@Rank programme was launched for the express purpose of keeping colleagues engaged, motivated, happy, and healthy at work.

Each of our offices has a Social and Wellbeing Squad that organises activities for their colleagues, and we offer a wide range of activities that cater to employees varying interests.

All our colleagues are able to access The Weekly webinars provided by PepTalk. These 30-minute interactive sessions cover a plethora of subjects including mental health and wellbeing, and there is a catalogue of over 700 hours of content which employees can access at any time. We invite guest speakers to talk about mental health, we continue to put colleagues through the Mental Health First Aider (MHFA) training and have MHFAs in all our clubs and offices. At our South Africa office, we hold weekly drop-in sessions for our team, designed specifically to allow them to raise personal wellbeing concerns.

Our Employee Assistance Programme (EAP), Be Supported, is provided by AXA Health. In October, to support Work Life Week, we launched a new app, AXA Health, for our colleagues via the EAP. The app is designed to build positive new wellbeing habits into day-to-day life.

In Spain, we conduct psychosocial risk assessments. These assessments are designed to analyse the risk of work-related stress for employees causing ill health and to inform the necessary measures to mitigate that risk. In Rank International, we are finalising the plan to hold localised activities, both in Spain and Malta, to help with the work-life balance and wellbeing of our colleagues.

Case study: Wellbeing at Maidenhead Support Office

We want all our colleagues to look forward to their day at work. At our Maidenhead office, we have introduced a host of fun initiatives and benefits for our colleagues, including:

- Free breakfast items available daily
- Free fresh fruit every Monday
- Monthly 'Take a Break' sessions to give everyone the chance to switch off from their screen
- Social club events and quarterly local STARS Awards events
- Free access to an onsite gym
- Massage therapist appointments available monthly (with funds being donated to Carers Trust)
- Yoga classes every Tuesday lunchtime.

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Environment

As a responsible operator, we aim to take the necessary measures to reduce our environmental impact.

By assessing energy consumption and carbon emissions across our portfolio, we are developing a Net Zero strategy and beginning to implement decarbonisation initiatives in our venues and offices.

Material issues

Energy use

Carbon emissions

Waste management

Water use

KPIs

36.6

Carbon intensity ratio

Objectives

Interim Net Zero Target 2035

Net Zero Target 2050

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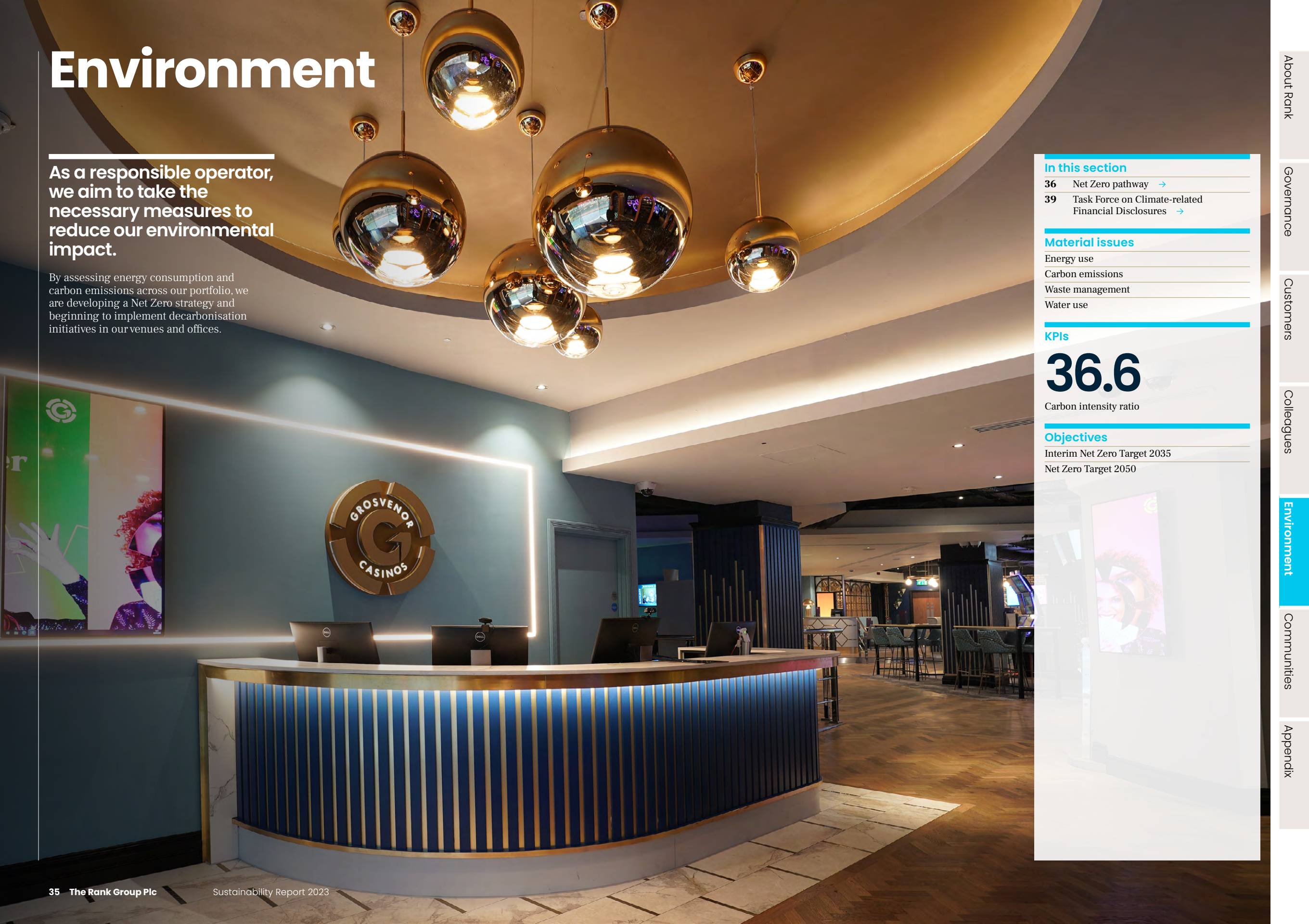
Net Zero pathway

Rank fully supports the international decarbonisation goal, as set out in the Paris Agreement. In order to meet the 1.5°C global warming target, global carbon emissions should reach Net Zero around mid-century.

Assessment and targeting

Rank's long-term goal is to achieve climate neutrality for its entire value chain (Scopes 1,2 & 3) by 2050, or earlier if possible. Meanwhile, an interim target has been set to remove all greenhouse gas ('GHG') emissions from an initial boundary by 2035. This boundary extends to all operations and includes Scope 1 and 2 and selected categories of Scope 3.

Work completed to date includes the preparation of an initial carbon baseline for 2021/22 that calculated our existing GHG emissions. The company has been working with specialist third parties to understand emissions, the options to reduce, and the effects of initiatives as they progress:

Consultus – for guidance on carbon reporting and reduction initiatives

Cloudfm – for detailed monitoring and reporting of actual energy usage

We have utilised the SECR (Streamlined Energy and Carbon Reporting) report, prepared by Consultus and delivered in July 2022, as the basis for recognising the baseline carbon emissions position of our business. The total baseline position calculated for 2021/22 is 26.8 kT of CO_2 emitted.

Initial boundary

All operations, including those in Spain, are encompassed in the scope of the interim Net Zero 2035 target for Scope 1 and 2 emissions, plus selected voluntary scope 3 emissions. The vast majority of these emissions come from electricity and gas, used to operate facilities, and assigned across scopes 1 and 2. Consultus projections expect this to grow by c.4% in 2023. Further work will be conducted in Q3/4 of 2023 to embrace the wider extent of scope 3 emissions – which we expect to be significant – including the preparation of a baseline assessment of scope 3 emissions.

Oversight of climate-related matters

Independent oversight

Board

ESG & Safer Gambling Committee

Sub-committee led by non-executive director, Katie McAlister

Strategy

Executive Committee

ESG Steering Group

Senior executive team including CEO and members of the Executive Committee

Business
Leadership and direction, aligning policies with business strategy, and ensuring governance is in place throughout
- Business strategy • Policies, planning and governance • Performance •

Implementation

ESG Working Group

Functional leadership team made up of relevant skills sets within the organisation
- Transformation • Procurement • HR • Information technology
- Sales & marketing • Compliance • Governance •

Net Zero Working Group

Cross-functional group of internal and external personnel, coordinated by Rank's ESG Strategic Programme Lead

Carbon reporting
To ensure a robust single source of truth for decision-making, investment and review of progress over time.
– Baseline carbon performance assessment
– Monitoring: Electricity, gas, fuel
– Reporting

Transformation
Methods to ensure that opportunities are captured, assessed and, where appropriate, executed with quality and pace.
– PMO: Business case, ownership, processes, risk & issue
– Carbon reduction initiatives
– Project dashboard

People
Build an inclusive and progressive culture to influence behaviours, encourage participation and share plans and achievements.
– Soft goals
– Team engagement communications
– Culture

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2021/22
Baseline Carbon Assessment

Calculating impact

Rank initial boundary covers for Scope 1 and 2 with selected Scope 3 categories. Preparing a baseline and reduction plan for Scope 3 emissions takes between 6 and 12 months.
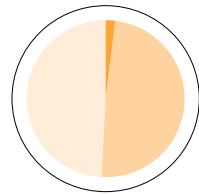
2021/22 baseline
- Scope 1 2%
- Scope 2 49%
- Scope 3 49%

Value chain
Scope 1
Covers direct emissions from sources owned or controlled by the company. This includes emissions from company-owned or operated facilities and vehicles.

Scope 2
Covers emissions from the generation of electricity purchased by the company.

Actions
– Implement trial carbon reporting tool
– Present updated Net Zero plan
– Review progress and approach

2022/23
Carbon Reduction Plan

Defining pathway

– Board approved approach to Net Zero plan development
– Engage suppliers for carbon reporting tool
– Engage supplier for Scope 3 investigation
– Mobilise culture and colleague engagement
– Apply Net Zero criteria in initiative approvals
– Complete PRISM energy capture phase one roll-out

Emissions recognition
Scope 3
While these are indirect emissions, they nevertheless make up a significant portion of a company's impact on the climate.

There are two categories:
– Upstream emissions from activities involved in the creation of a company's services or goods. This includes emissions from employee travel and commuting to work, and emissions in the supply chain from the production of purchased goods and services the company uses or sells.
– Downstream emissions occur from the distribution or use of a company's goods, including the disposal of products.

2023–35
Interim Target

Interim Net Zero

Rank's interim target is to remove all GHG emissions from an initial boundary by 2035.
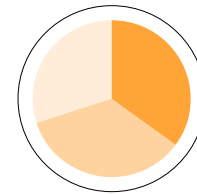
Distinguishing tracks
- External actions 35%
- Internal initiatives 35%
- Consequential response 30%

Energy reporting methods
Scope 3
Technological tools are being rolled out to capture facility energy usage data at source, with additional systems under review for:
– Capture of non-facility data, e.g. vehicles, waste
– Translation from usage into a common carbon metric

Internal and external actions
– Building rationalisation
– Grid abatement
– Offsets
– PPA supply

2035–50
Longer-term Goal

Climate Neutrality including SBTi alignment

The SBTi's Corporate Net Zero Standard is the world's leading framework for target setting and includes the criteria needed to set science-based Net Zero targets consistent with limiting global temperature rise to 1.5°C.

This requires emission reductions through direct action within companies' own boundaries or their value chains. Offsets are only considered to be an option to finance additional emission reductions beyond their science-based target.

Implementation actions
Environmental champions
Identify suitably motivated and willing colleagues to advocate climate-positive sentiment and actions in their workplaces.

Communications
Establish a comms plan to provide regular and relevant messaging to internal and external communities to inform, stimulate and motivate positive behaviours.

Incentives & recognition
Fund and implement suitably oriented schemes to recognise and reward positive contributions and excellent behaviours.

Current and proposed pathways

Several initiatives and actions have been identified to reduce the Group's carbon footprint. Some benefits will be felt as part of pre-existing investment plans, such as background improvements in carbon efficiency through energy contracts, or the considerations of continuing to operate in certain venues. Others will come as a result of internal initiatives planned and implemented by the business.

Energy reporting

We are utilising technology tools to capture facility energy usage data at source. The Mindsett PRISM is an energy management system which provides planned and reactive facilities management from Cloudfm (our energy consultants). It willl be implemented over the next three years across Rank UK.

At the end of 2022/23, we began the installation of smart-sensing devices at our top 40 highest energy consuming sites in the UK. The devices now capture data from every asset that is plugged in at these venues, from each individual slot machine through to the heating, ventilation, and air conditioning ('HVAC').

The data we are collecting is combined with the metered gas data; this helps us understand the full picture of energy usage at each venue. This information can be accessed through an energy usage dashboard. The platform enables the business 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. It will also be able to create a profile on each asset, whether that be a fridge or a PC.
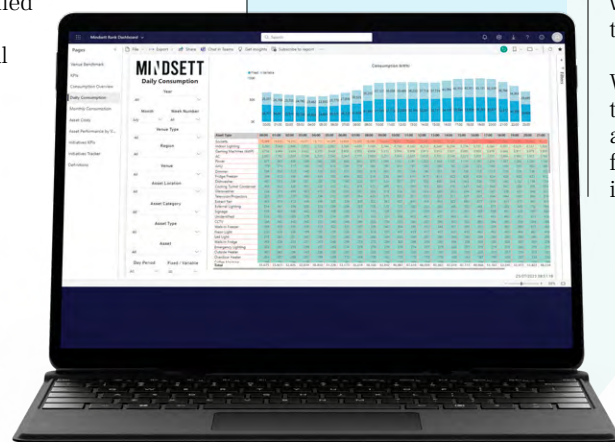
3.89
Amount of hazardous waste (tonnes)

1,149
Amount of non-recycled waste (tonnes)

1,053
Amount of recycled waste (tonnes)

206,498
Total water usage (m³)

Owing to the granularity of the performance data captured per asset, the system can predict potential faults.This will allow 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.

Additional systems under review include the capture of non-facility data, e.g. vehicles and waste; translation from usage into a common carbon metric; presentation of a carbon dashboard.

Change management

By affecting behavioural change, technology can be used to pursue our decarbonisation objectives. Educating everyone about our Net Zero ambitions is therefore key and will complement our decarbonisation workstreams. To support the implementation of our plans, we are mobilising the Group to develop positive culture and processes, deliver practical initiatives to reduce carbon emissions, and introduce reporting mechanisms to demonstrate progress in line with the stated ambition. These include:
- **Environmental champions** – motivated and passionate colleagues to advocate climate-positive sentiment and actions in their workplaces
- **Communications** – we have established a communications plan to inform internal and external communities, and to drive improved behaviours
- **Incentives and recognition** – funding to recognise and reward positive contributions and excellent behaviours.

Starting with the installation of the PRISM technology in venues, we have established a calendar of engagement for 2023/24. This commenced with training sessions for employees in Summer 2023 on the use of the Mindsett platform. The aim of these sessions was to familiarise colleagues with both how to use the platform and the information that it provides.

We will check in with our employees throughout the year to continue embedding awareness about energy reduction, gather feedback on environmental initiatives, and incentivise positive behavioural change.

Refining our approach

It is a strategic imperative for our business to refine our decarbonisation strategy. As we are now gaining greater understanding of energy use across the business, we are developing an investment strategy that is informed by robust data and establish a credible pathway to Net Zero.

The chart (below) maps our current decarbonisation initiatives across the business. With greater understanding of our Scope 1 and 2 emissions, the waterfall currently focuses on initiatives in these areas. The initiatives include: measures that we are already undertaking, such as changes to our venues portfolio; measures which have been identified during site-specific audits, such as upgrading a heating system; measures which can be applied on a national level across similar properties, such as improving internal awareness of energy use; and, lastly, green energy and offsets.

A number of initiatives that we are undertaking will require a degree of investment, however we have calculated a far greater return in cost savings as a result of their implementation.

Of the measures we have set out for 2023/24, entering a renewable electricity power purchase agreement (PPA) represents a significant saving in tonnes of CO₂ at the lowest investment cost. Instrumental in reducing our carbon footprint, however, will be measuring and addressing Scope 3 emissions. Supported by our carbon consultants, we are assessing the 15 categories of Scope 3 emissions to better understand this footprint.

Our initial focus is on the areas of greatest spend, with a view to establishing more granular detail on the supply chain in the future. In order to support this process, we are looking into options for a carbon accounting.

With operations in Spain, we recognise the obligations of EU legislation. The Corporate Sustainability Reporting Directive ('CSRD') requires companies to report on their Scope 3 emissions by 2025. We are committed to meeting these legislative requirements, but will not limit this exercise to the Spanish business, rather approach Scope 3 reporting from a Group-wide perspective.

Net Zero waterfall

Decarbonisation initiatives	
Today	100
Portfolio Changes	−8.00
Summer Ready Initiatives	−0.43
Installed Equipment (Electronic Gaming Machines)	−0.64
Reporting/smart metering	−1.52
Lighting	−4.23
PPA	−7.77
Cultural Engagement	−2.57
BMS/Controls	−5.56
Self Generation (PV)	−0.97
Heating/Cooling Systems	−11.74
Hot Water	−3.30
Refrigeration/kitchen	−0.67
Grid Abatement	−19.55
Carbon Offsets	−33.06

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

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 appraised of progress on climate-risk considerations, specifically via the ESG Steering Group, who assume executive ownership and accountability for the sustainability strategy. This year, updates given to the Board have focused on specific energy reduction assessments and initiatives to address the decarbonisation agenda, as well as progress against the Group's established non-financial KPIs. (See page 36 for organogram.)

The Board has clear oversight of climate-related matters through its committees The ESG & Safer Gambling Committee in particular is responsible for overseeing the company's approach to climate risk, defining strategies and proposed actions. 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.

As well as receiving internal information, the Board is given updates by our external consultants and this year received a presentation from ESG specialists on TCFD reporting and Net Zero planning.

"We are in a much stronger position as it relates to legislative requirements, particularly on environmental regulation. Having received training from our ESG consultants on reporting in this space, the Board and ESG & Safer Gambling Committee have a more complete understanding of what is required of the business, and have led in stepping up to meet those requirements. We now have interim Net Zero targets in place, supported by a carbon reduction plan."

Katie McAlister,
Chair of ESG & Safer Gambling Committee

Climate-related issues factor into the Board's decision-making processes, specifically around the strategic management, operational implementation and requirement for capital expenditure. A significant component of the annual budget is the continued investment into our real estate; current considerations include insulation, lighting, and heating, ventilation and air conditioning control. Climate-related issues will continue to be a matter for the Board in reviewing and guiding performance objectives, monitoring and performance.

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 Risk Committee considers current and future climate-related 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 and is therefore a low risk on the Risk Register. This Group Risk Register is also informed by the risk registers held at business unit level from Mecca, Grosvenor, Rank Interactive and Rank International.

The Net Zero Working Group continues to assess any vulnerabilities over various time horizons. The key drivers for our recognition of climate change as low risk are principally transition risks. We are mindful that there are also certain physical risks that may impact some of our operating sites. Consideration to address all of these risks is being built into our Net Zero investment strategy.

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. This year, we established an ESG Steering Group ('ESG-SG'), led by our Director of IR and ESG. The ESG-SG plays a strategic role by setting out the ESG-related objectives for the Group, which includes climate-related matters. Operationalisation of this strategy is delegated to the ESG Working Group ('ESG-WG'), led by our ESG Strategic Programme Lead.

In the UK, the executive management teams of the ESG Steering Group, Net Zero Working Group and ESG Working Group are supported by external advisors, specifically relating to our climate-risk reporting and Net Zero workstreams. The consultants – Consultus, Cloudfm, JustaEnergia and 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 are in the process of contracting a consultant to support on the development of a country-level Net Zero strategy. The business is informed by environmental management consultants and 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. 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 indirect emissions management within the downstream supply chain in order to meet Net Zero expectations; and the management of our land-based venues through efficiencies in portfolio management with decarbonisation of our property estate material in reducing our direct emissions.

A holistic approach to decarbonisation can only be achieved by considering climate risk across all locations. The Managing Director in Spain holds ultimate responsibility for a Net Zero strategy for our land-based Enracha venues, supported by the Head of Transformation in Spain on day-to-day operations. Aligning with the overarching Group Net Zero strategy, the business is developing a country-specific Net Zero strategy for our Spanish operations. This will be informed by the energy assessment that we are conducting for the these venues; a pilot programme that is currently underway. To foster awareness for this initiative, a country-wide project was introduced to all employees at the beginning of 2023/24, with involvement from General Managers across all venues.

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

Strategy

The Net Zero Working Group is defining a comprehensive decarbonisation and investment strategy across the UK portfolio. 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 above, Rank to £57m investment in climate-related and aligned initiatives over the next 12 years within the UK. At present, the Board believes that the £57m budget will be allocated in approximately equal tranches over the next 12 years. However, as our understanding of our portfolio improves over the next few years, due to the use of the Mindsett technology, the speed of investment may alter. It's important that this quantum is allocated and communicated to our stakeholders, but equally we believe these investments should be informed by reliable data. Key functions, such as property, will be the most significant areas for investment. The allocation of capital for projects supporting our Net Zero targets will undergo strategic and financial review, inclusive of new PMO screening.

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. In 2021/22, Rank's accounting team assessed climate-related matters that may impact the Group's financial statements.

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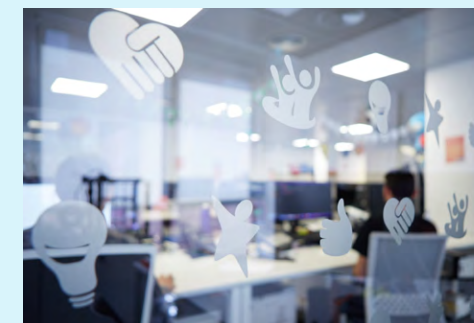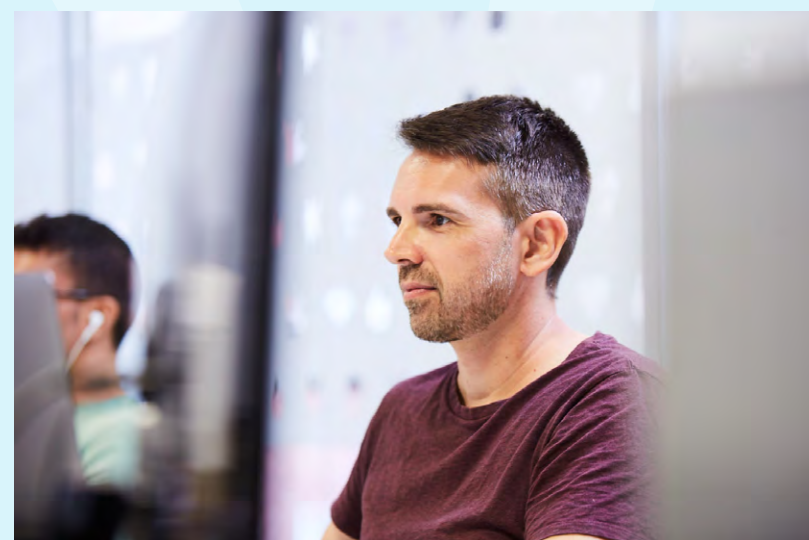
Task Force on Climate-related Financial Disclosures ('TCFD') Continued

Climate-related risks and opportunities

The Group has identified climate-related risks that could have a material financial impact on the business, assessing the potential outcomes of each risk, describing the mitigating activities undertaken, and including the timeframe for impact. These are consistent with the assessment in 2021/22. We define the short, medium, and long-term time horizons as the following: short – present to 2030; medium – 2030 to 2040; and long – 2040. The financial impact of differing levels of risk are defined as follows: low – managed as part of existing processes; medium – additional mitigation or investment required; and high – significant investment required and considered material risk to the business.

Climate change presents some opportunities also. Organisations that shift their energy usage towards low-emission energy sources can potentially reduce their annual energy costs. Furthermore, innovation and development of new low-emission products and services may improve competitive positioning and capitalise on shifting consumer and producer preferences.

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.

Transition Risks

Risk description	Potential outcomes	Financial impact	Mitigating activities	Timeframe
Policy and Legislation				
That Rank is not able to respond to increasingly stringent reporting obligations to the frequency or quality required.	Legal and/or reputational issues, which in turn drive compliance costs and potentially impact the cost of capital.	Low	Monitor potential legislative and regulatory changes. Considering ability to achieve Net Zero by 2035 target. Working to define Net Zero strategy and set interim targets.	Short to medium
That nation states may introduce carbon emission levies, placing an additional fee upon energy consumption costs.	This may increase Rank's operating costs	Low to medium	Assess property portfolio to determine investment programmes that make building more energy efficient, less carbon intensive. Seek to source green energy.	Short
That new climate-related laws or regulations for which Rank is not prepared for.	Rank may be subject to an increase in accounting provisions, not initially budgeted for. This may impact profitability. Rank may be subject to increased compliance costs.	Low	Define decarbonisation strategy to remain ahead of regulation.	Short to medium
Technology				
Technology advances introducing more environmentally friendly equipment to replace existing IT infrastructure.	Whilst Rank does not rely on carbon-intensive assets for value generation it nevertheless uses IT equipment to fulfil a variety of functions, including online gaming platform IT infrastructure and general business/operating IT infrastructure. This infrastructure may suffer a reduction in useful life driven by major advances in IT energy efficiency, driving increase in depreciation and amortisation costs.	Low	We regularly invest in our equipment. As more energy efficient machines are introduced to the market, these will naturally be integrated into our infrastructure through our investment cycles.	Short to medium
Market				
Climate-induced changes to customer preferences for leisure.	Changes in consumer preferences may encourage more players to play online at home, rather than incur possible transportation emissions and continued utilisation of inefficient spaces. Regarding temperature changes affecting consumer preferences, we have noted different behaviours in the UK and we are monitoring this in Spain as well.	Low	Formalise and communicate clear decarbonisation strategy.	Long
Supply chain cost inflation.	Increased costs related to the use of new environmentally friendly materials or processes could result in contracts previously expecting to be profitable becoming loss-making.	Low	Commencing Scope 3 assessment to better understand Rank's exposure to high emitting sections of its value chain. In time, will seek increased information regarding climate risk exposure from key suppliers.	Medium
Reputational				
Failure to meet internal or external stakeholder climate-related expectations, thereby impacting relations.	Perceived higher risk investment, increasing cost of capital with investors, financial institutions and insurers. Reduced revenues due to challenges in attracting new talent and increased opex from employee turnover.	Low to medium	Define and communicate our Net Zero ambitions.	Short

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

Physical Risks

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

During the year, the Group conducted a desktop assessment to review the perceived flood risks of our UK and Spanish operations.

This research utilised data from the UK Government, Scottish Environment Protection Agency ('SEPA'), and Natural Resources Wales, and ThinkHazard!, an online tool developed by the Global Facility for Disaster Reduction and Recovery ('GFDRR').

11 of the 107 venues in the UK were identified as high risk from surface water, river or coastal flooding. The Group monitors these sites closely and we have flood contingency plans in place for each venue. Investment into potential flood defences is based on a variety of commercial and leasehold factors, which the Group is presently working through.

Financial assessment is conducted on our high-risk sites, but it is deemed not material enough to influence future investment decisions regarding if a site is retained. This underscores the low risk of climate change from a physical perspective, impacting our future cash flows. This is our current analysis on the physical risks posed by climate change – whilst the physical risk may change over time, we do not believe financial materiality will.

Currently, we believe there is little to no impact from the physical risk presented in Spain on our financial performance.

The more management information we gather through our energy assessments in the UK and Spain, the better informed we will be on the physical risks presented by climate change.

Physical Risks

Risk description	Potential outcomes	Financial impact	Mitigating activities	Timeframe
Extreme weather events like drought, flooding and storms				
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 impact opex and capex, or impact revenue if customer demands for online entertainment cannot be met.	Low to medium	Business continuity and crisis management plans in place	Short to long
Changes in average climate conditions including rising sea levels, coastal flooding and increased average temperatures				
Increased operating costs driven by the increased use of climate control systems across our properties.	Increased maintenance and insurance costs.	Low to medium	Investment into property portfolio	Short to long

Flood risk assessment for UK and Spanish venues

UK venues	Surface water	Rivers	Coastal
High risk	8.5%	1.9%	0.9%
Medium risk	17.9%	3.8%	–

Spain venues	Surface water	Rivers	Coastal
Medium risk	–	11.1%	–

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

Scenario analysis

To evaluate the resiliency of the Group's strategies to climate-related risks and opportunities, in 2021/22 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.

<2°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 (to 2030)

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 (2030 to 2040)

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 (beyond 2040)

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.

>2°C scenario

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

Risks

Short term (to 2030)

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 (2030 to 2040)

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, whilst under-investment into cleaner energy fails to bridge energy demand gap.

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

Long term (beyond 2040)

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 costs.

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

Conclusion

Following our assessment, we believe that the business is resilient under either scenario. Whilst 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 Pathway to Net Zero mean we are mitigating risk in this area.

Qualitative vs quantitative scenario analysis

The TCFD recognises that a qualitative assessment is a reasonable first step in conducting scenario analyses of climate risk, at different temperature pathways. Underpinned by the gathering of experiential information from different Group functions (such as property and finance). Management has gathered an understanding of how climate change could impact the business, whilst identifying potential data points that will require more robust monitoring and analysis.

The ability to explore the implications of non-quantifiable information makes qualitative scenario analysis well-suited to assessing transitional climate risks (such as regulation or carbon costs). As qualitative scenarios only give high level views of physical climate risks (such as increased precipitation), we will look to quantify the future potential impacts, such as flooding or extreme heat risk on the business, however marginal the scenario may be and the emerging nature of the risk.

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

Risk management

In accordance with our assessment of the risks posed by climate change to our business, climate risk is included as an emerging risk on the Company's Risk Register. 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 climate-related risks are made in the same manner as any risk on the Risk Register, as climate risk is included as a standalone risk on our Risk Register and is therefore integrated into the overall risk management framework. Defining climate as an emerging risk also means that the Audit Committee has general oversight of this issue. Additionally, through guidance from the ESG & Safer Gambling committee, the Audit Committee is encouraged to consider climate-related matters when assessing the following Principal Risks: taxation (should a carbon price be introduced); business continuity planning and disaster recovery (should any physical climate-related risks impact the business or its supply chain – flash flooding etc.); and people (desire to work for an employer that is committed to Net Zero etc.).

To determine the relative significance of climate-related risks in relation to other risks, we conducted a materiality assessment, in 2021. This process, engaging a range of stakeholders both internal and external to the organisation, placed climate risk as a low-risk matter, relative to other ESG issues. We also monitor the regulatory space in order to be informed of any developments that could impact the influence of climate-related issues. Currently, some existing and emerging regulatory requirements related to climate change are considered a risk by Rank.

To improve operational risk management, Rank has established a Net Zero Working Group ('NZWG'), comprising a multi-disciplinarian, cross-functional group of internal and external personnel (including ESG, climate-focused experts and behavioural scientists to support the rollout of each programme across the company). This group is focused upon decarbonising Rank's UK operations. The NZWG comprises the Director of IR and ESG, Director of Supply Chain, and Head of Property and is coordinated by Rank's ESG Strategic Programme Lead.

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). It will assess energy efficiency of all equipment, identifying improvement opportunities and supporting any investment case through decision-useful information provided through dashboards.

The NZWG convenes frequently to assess progress against the plan in order to set a robust Interim Net Zero target for Scope 1 and 2 for the Group by 2035, and an SBTi-aligned Net Zero target by 2050. This is inline with national and international targets. The company is exploring whether this timeframe can be brought forward through the ongoing Net Zero assessment, and the Net Zero Working Group is in the process of advancing its integration of risk and opportunity assessment. This includes adjustment of business strategy, policies, planning and governance systems with clear performance objectives. The implementation of our Net Zero strategy will be delivered through three interrelated workstreams: carbon reporting, transformation (PMO and designing investment plan), and cultural and behavioural change.

To align with the Group Net Zero target, we are developing a specific Net Zero strategy for the Spanish portfolio, and have initiated an energy assessment of the land-based venues. To account for seasonal variation in energy consumption (use of HVAC being much higher in the summer months), the project was launched in Spring 2023. We began by assessing energy use in one venue, gathering data before implementing basic changes to make energy savings. The next stage will be to roll out this assessment to the three venues with the largest carbon footprints. Gathering data from four venues across multiple months will provide a more comprehensive picture of energy consumption in the Spanish portfolio, and support the creation of a realistic Net Zero strategy.

Beyond this specific Net Zero strategy, climate change considerations are now integrated into the rest of the business in a more structured and formalised manner. Each new project introduced in any part of the Group is reviewed against climate assessment criteria that is built into the project approval process.

Metrics and targets

In line with our maturation of strategy and risk management, we will be setting time-bound targets for the business. Our NZWG is conducting an assessment of the most energy intensive venues in the UK portfolio, which will enable the development of an informed and realistic plan for achieving Net Zero across the entire venues estate. We intend on disclosing 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 and 2 emissions and specific Scope 3 elements in the Group for 2035. These are based around clear initiatives that include building rationalisation, grid abatement, PPA supply and various other energy reduction measures.

By integrating climate considerations into the approval process for projects, we will use GHG emissions and carbon intensity metrics to support the assessment and qualification of investments.

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 a limited range of Scope 3 impacts. These are published as part of the Group's obligations to report in line with Streamlined Energy & Carbon Reporting ('SECR'). A broader assessment is taking place over the next reporting period, in line with SBTi based methodologies.

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 2022/23 was £681.9m, with a carbon intensity ratio of 36.6 tCO₂e per £m NGR (for 2021/22 it was 41.7).

Carbon intensity ratio

	2022/23 tCO$_2$e per £m NGR	2021/22 tCO$_2$e per £m NGR
Greenhouse gas emissions intensity	36.6	41.7*

* The figure for 2021/22 has been restated

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

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

Scope boundaries
The Rank Group Plc have used an operational control approach to define their GHG emissions boundary, as they have full authority to introduce and implement its operating policies at their operations. Rank are reporting at group level and therefore must take into account not only their own energy and carbon information, but also the information of any subsidiaries included in the consolidation which are quoted companies, unquoted companies or LLPs.

The Group will therefore include the following entities within the overall emission calculated in this report: Grosvenor Casino Limited; Grosvenor Casinos (GC) Limited; Mecca Bingo Limited; Enracha (Spain).The mandatory reporting for The Rank Group Plc captures emissions from their global operations, which are UK and Spain, relating to activities from stationary combustion i.e combustion of gas, mobile combustion i.e fuel used in transport for business purposes, fugitive emissions i.e refrigerants used in air conditioning and the purchase of electricity by the group for its own use, including for the purposes of transport. In addition to reporting on the mandatory scope,

The Rank Group Plc have chosen to also voluntarily report on emissions resulting from electricity transmission and distribution losses, air travel and waste disposal. The Group has taken guidance from the UK Government Environmental Reporting Guidelines (March 2019), the GHG Reporting Protocol - Corporate Standard, and from the UK Government GHG Conversion Factors for Company Reporting document for calculating carbon emissions.

The information has been collected and reported in line with the methodology set out in the guidelines, and the emissions have been calculated using the 2022 UK Government GHG conversion factors. This report covers the reporting period July 2022 to June 2023, which is in line with the Group's financial reporting period.

Supporting material
An emissions data file has been compiled according to a specification agreed with Rank that is in accordance with the reporting guidelines. The supporting data, as supplied by Rank and relevant third-party suppliers as applicable, is held in an evidence pack and supplementary databases. This supporting data is held by Consultus International Group and can be made available on request.

Quantification and reporting methodology
The Group has taken guidance from the UK Government Environmental Reporting Guidelines (March 2019), the GHG Reporting Protocol - Corporate Standard, and from the UK Government GHG Conversion Factors for Company Reporting document for calculating carbon emissions. Energy usage information (gas and electricity) has been obtained directly from our energy suppliers and half-hourly (HH) data, where applicable, for the HH supplies. For supplies where there wasn't complete 12 month energy usage available, flat profile estimation techniques were used to complete the annual consumption.

Transport mileage and/or fuel usage data was provided for their company and employee owned vehicles. For business travel in employee owned vehicles where the employee is reimbursed for the mileage travelled, there is limited information available. We have therefore had to use conversion factors for an average vehicle with an unknown fuel type. CO_2e emissions were calculated using the appropriate emission factors from the UK Government GHG conversion information with the exception of Spain electric which is from Carbon Footprint.

Overall Group position

Source	2022-23 kWh	2021-22 kWh	% of 2022-23 total	Change +/-
Gas	58,804,557	63,554,204	47%	-7%
Electricity	60,963,973	61,279,863	49%	-1%
Business Travel	4,849,493	3,993,358	4%	21%
Total	**124,618,023**	**128,827,425**	**100%**	**-3%**

UK Group position

Source	2022-23 kWh	2021-22 kWh	% of 2022-23 total	Change +/-
Gas	58,242,616	63,110,578	49%	-8%
Electricity	57,009,987	57,120,020	47%	0%
Business travel	4,849,493	3,993,358	4%	21%
Total	**120,102,096**	**124,223,956**	**100%**	**-3%**

Spain Group position

Source	2022-23 kWh	2021-22 kWh	% of 2022-23 total	Change +/-
Gas	561,940	443,626	12%	27%
Electricity	3,953,987	4,159,843	88%	-5%
Total	**4,515,927**	**4,603,469**	**100%**	**-2%**

GHG emissions summary

Source	2022-23 tCO2e	%	2021-22 tCO2e	%
Gas (Scope 1)	10,734	43.2%	11,641	-8%
Company Transport (Scope 1)	142	0.6%	551	-74%
Employee Transport (Scope 3)	599	2.4%	206	191%
F-Gases (Scope 1)	153	0.6%	145	6%
Electricity (Scope 2)	11,632	46.8%	12,897	-10%
Transmission & Loses (Scope 3)	1,078	4.3%	1,089	-1%
Air Travel (Scope 3)	433	1.7%	198	119%
Waste (Scope 3)	82	0.3%	112	-27%
Total	**24,853**	**100%**	**26,840**	**196%**

Source	2022-23	2021-22
Scope 1 (mandatory)	11,029	12,337
Scope 2 (mandatory)	11,631	12,897
Mandatory Total	22,660	25,235
Scope 3 (compulsory)	2,193	1,605
Total	**24,853**	**26,840**

By Country emissions summary

Source	UK	Spain	Total (tCO2e)
Gas (Scope 1)	10,632	102	10,734
Company Transport (Scope 1)	142	-	142
Employee Transport (Scope 3)	599	-	599
F-Gases (Scope 1)	153	-	153
Electricity (Scope 2)	11,024	608	11,632
Transmission & Loses (Scope 3)	1,009	69	1,078
Air Travel (Scope 3)	433	-	433
Waste (Scope 3)	82	-	82
Total	**24,074**	**779**	**24,853**

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

This is our second year of reporting against the recommendations of the TCFD, a requirement under Financial Conduct Authority ('FCA') listing rules. In line with the intentions we set last year, we have strengthened our climate-related governance, strategy, risk management, and metrics and targets. Our disclosures are not yet fully consistent with the TCFD recommendations, and in such cases we have explained why and provided a description of the priority actions to be taken to close the gaps.

Pillar	Recommendation	Location	Consistency statement 2022/23	Intention
Governance	a. Describe the Board's oversight of climate-related risks and opportunities.	pg.39	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.	pg.39	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.	pg.41-42	Consistent	Develop the Net Zero strategy with clear time horizons.
	b. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	pg.40-43	Consistent	Utilise the results of the energy assessment to develop an informed investment strategy for the decarbonisation workstreams. Provide training to colleagues to instigate behavioural change within the Group.
	c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	pg.43	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.	pg.44	Consistent	Implement energy use dashboards to inform decision-making and preventative maintenance across portfolio.
	b. Describe the organisation's processes for managing climate-related risks.	pg.44	Consistent	Continue to evolve the NZWG and embed it more firmly within the organisation, alongside the workstreams for employee education and engagement.
	c. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	pg.44	Consistent	Complete the development of risk and opportunity assessment and implement Net Zero Strategy.
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.	pg.44	Partially consistent	To disclose opportunity metrics, informed by the learnings of the energy assessment.
	b. Disclose Scope 1, Scope 2 and, if appropriate Scope 3 greenhouse gas ('GHG') emissions and the related risks.	pg.44-45	Consistent	Assess the 15 categories of Scope 3 emissions to better understand this footprint.
	c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	pg.44	Partially consistent	To disclose an SBTi-aligned plan for reaching Net Zero.

Communities

As a land-based venues operator, we are embedded into numerous communities across the country.

Our clubs act as an important social hub for local people and our colleagues truly care for their customers. The relationships we have established enable us to give much-needed support to under-served communities.

Material issues

Community investment

KPI

£283k

Total charitable funds raised

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We know that we play a central role in the communities we operate in. Our venues often serve as a social hub, and our Mecca clubs, in particular, are a key place for interaction amongst our older cohort of customers.

Having established close ties with local residents, charities and groups during the pandemic, it was important to us that we maintained those connections and utilised our position to facilitate even more positive outcomes for these communities.

At Mecca, our Managing Director leads our community strategy, where working with the community has become the integrated into 'business as usual'. A key performance indicator (KPI) for every club's General Manager is to deliver on community-based engagement. The nature of 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 which they are often a part of themselves.

As well as our localised initiatives, we have a long-standing, Group-wide partnership with Carers Trust in the UK, and this year alone raised £283,019 for the charity. Our efforts were recognised at the 2023 *European Casino Awards*, where we won the Corporate Community Engagement Award.

Local community impact

Our clubs have once again gone above and beyond expectations by raising money and providing support to their local communities. We are increasingly recognised for the value we bring to communities by local leaders, including Members of Parliament. This has enabled us to further strengthen our community relations and allows us to work with local representatives and groups to deliver initiatives that have a significant impact.

This year, our colleagues have undertaken a wide range of initiatives: from Swansea, where the club has continued to support partnerships established by their local MP, including acting as a hub for donation of gifts as part of Everyone Deserves an Easter campaign and once again supporting the Everyone Deserves a Christmas campaign, to Blackpool, where we sponsored the city's Pride event, prepared thousands of meals for homeless people, and held the KAV Cup poker event, raising further funds for charity.

We have also delivered a number of location specific community initiatives across our offices. Our South Africa office celebrated Slipper Day as part of the Reach for A Dream foundation and donated towards the cause aimed at fulfilling the dreams of youngsters fighting life-threatening illnesses. They also collected donations for The Haven Night Shelter, for which each R75 donated helped sponsor a bed for five nights for the homeless. In Gibraltar our team continues to run raffles and collect donations during monthly team celebrations and all money raised is split between Carers Trust and two local charities.

Another important avenue for supporting local people is through employment at our UK venues. The betting and gaming sector is an exciting industry to work in and we take pride in the job opportunities we offer. Being embedded in communities, we have close ties with job centres in many towns and cities across the country. We work with them to advertise roles to local people, including running job fairs at the centres in order to speak with prospective candidates directly.

We also promote jobs through online platforms, sending a mailer to any individuals listing a postcode where we are advertising a job. This targeted advertising is one of our most successful methods of recruitment, as we find people are often looking for employment close to home.

A certain amount of spend is dedicated to apprenticeships. Whilst 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 pot 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. Group-wide charity partnership.

Case study: Community Fundraising at Mecca Wrexham

Mecca Wrexham set itself a target to raise £10k between January to December 2023. Funds are being donated to a range of local and national charities including the Welsh Air Ambulance, children's hospices, and the Royal British Legion. The team has set a calendar of activities for the year and is well on its way to the target, having raised over £3,900 by Spring 2023!

The venue also acts as a community space, with the local MP holding clinics at the bingo club. Colleagues once again donated to the Everyone Deserves a Christmas and Everyone Deserves an Easter campaigns which provide gifts for families and individuals in need, and also raised money to fund the transport of products to Ukraine.

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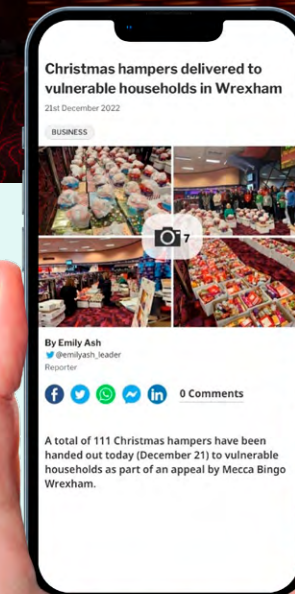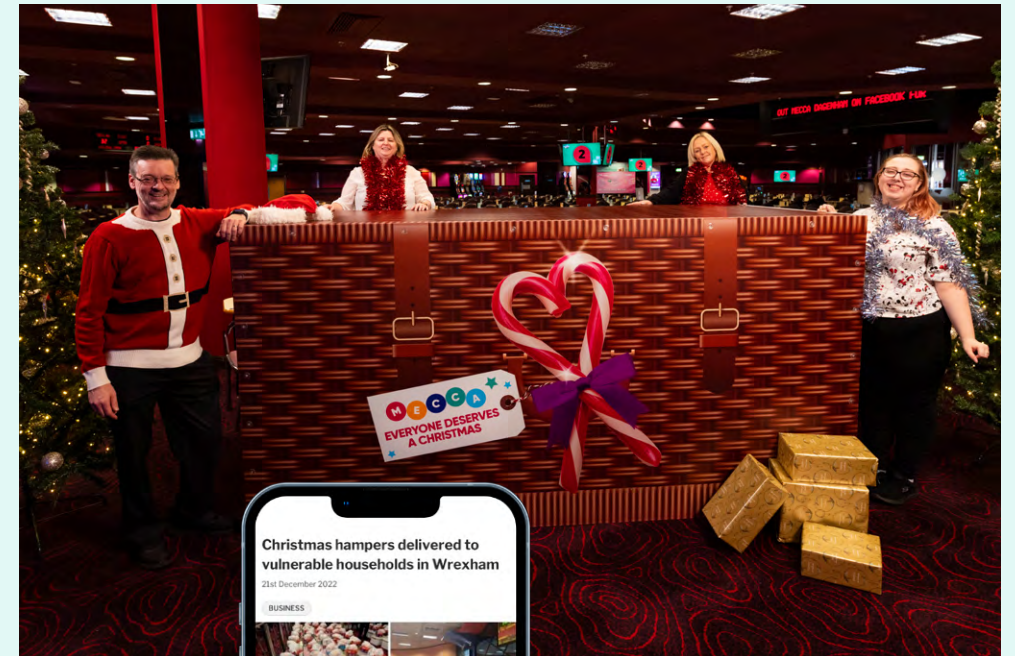
Group-wide charity partnership

In order to scale our charitable efforts to make a meaningful impact to a cause that is important to the business, Rank entered into a partnership with Carers Trust in 2014. The charity works to improve services, support, and recognition for unpaid carers. Since the start of the partnership, the Group has raised £3,476,782 for Carers Trust, supporting over 13,615 carers.

Our colleagues continue to show commitment and enthusiasm for taking on challenges to support Carers Trust. Throughout the year, our team has been involved in numerous fundraising activities, including the London Marathon, Tough Mudder runs, and the London to Brighton Cycle Ride. In September, Mecca completed a £60k in 60 days challenge, raising money through a series of events across two months and hitting the £60k target for the second year running. Our Goliath Poker and City Poker events this year collectively raised nearly £9k for the charity.

"I was unaware the money Rank raises makes such a different to people across the nation. Never did I imagine there were so many unidentified carers out there receiving no support that have the daily pressures of looking after a loved one. These people are working full-time jobs or, like a young carer I met, who at only 15 looks after his younger brother when he's not in school studying… that's where the Carers Trust step in by supporting unidentified carers by giving people the extra support they need."

Benjamin Maycock,
Show Host 50 Years of Caring for Carers

"Over the last couple of years, my family have experienced the challenge of becoming carers and I can see how much value Carers Trust brings to others in a similar position. I've always wanted to attempt a marathon but have never had the guts to sign up, so the opportunity to take part in support of Carers Trust gave me an intrinsic motivation to give it a go. I loved the experience and am looking forward to raising more money for Carers Trust in our next event as we take on the 10k Tough Mudder!"

Danni Sablone,
Learning and Organisational Development
Business Partner

Case study: A carer's story

Hello, I'm Louise, 34, and I've been a full-time carer for my mum since I was 18 years old.

My mum, Lynda, is 66 and she suffers from a range of conditions, including asthma, diabetes and chronic obstructive pulmonary disease – a progressive lung disease that leaves her with breathing problems and makes everyday activities very difficult. When her conditions became too much of a challenge, I ended up leaving college to look after her at our home in Bexhill-on-Sea, East Sussex.

I give her medication, do the cooking, help her get dressed when she can't do it herself, give her showers when she needs me to – pretty much everything you can think of. It means I don't really get a lot of time to myself or buy much for myself either. Like many other carers, we mainly have to live off Carer's Allowance, which doesn't go very far each week. With costs rising, it's been really difficult to work out how far we can stretch the money. We spend a lot on electricity because Mum needs a special machine to help her sleep at night but bills have been increasing.

With so much to do with little money, small things going wrong can cause huge problems. Mum's condition means we have to do a lot of clothes washing on a daily basis. So, when our washing machine started breaking down, we couldn't afford to get it replaced and I was having to take Mum to the launderette in her wheelchair with bags of clothes and spend money there instead.

When I was given a Rank grant to help replace the machine it made a massive difference to me and Mum. Without it we would still be saving up for months and really struggling with that, on top of the cost of everything else.

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Group-wide charity partnership Continued

As well as contributing funds, we are committed to using our platform and leveraging our relationships with communities to raise awareness for the charity and advocate for the cause. Carer's Trust's CEO spoke on Mecca TV, our channel for online bingo players, encouraging anyone that identifies as a carer to get in touch to receive support. In March, for Young Carers Action Day, we *presented an open letter* to the Prime Minister, calling for his support for young carers and young adult carers. For Carers Week, we raised awareness throughout the week, sharing carers' stories internally and on our social media channels.

We established Rank Cares Grants, a grant programme which welcomes applications from carers. The grants are offered under three brackets: Carers Essentials Fund, contributing to the cost of vital equipment such as washing machines, cookers, fridge freezers or beds; Carers Take Time Out Fund, offering carers time out from caring to relax, do something for themselves and recharge their batteries; and Carers Skills Fund, enabling carers to learn new skills to help them with caring or to return to work.

The funding applications are submitted to one of our 120 network partners around the UK, and are then reviewed by a Grants Panel. We invite colleagues from across Rank to sit on these panels. In doing so, they can better understand and appreciate so the impact of our fundraising and the importance of supporting carers.

"Sitting on the grants panel for the Carers Trust really brought the reality of the challenges people face, either caring for a loved one or trying to manage looking after multiple generations in their family. The money raised across Rank for Carers Trust goes directly to help the people and families most in need, and the fact we can help in any way made me feel we are making a difference to people's lives where it matters. To be part of it was a truly humbling experience."

Cheryl Gifford,
Mecca Marketing Director

"Being a part of the Carers Trust grants panel gave rise to a mixed set of emotions. It was great to hear how our contributions have helped carers, who in turn will be able to support their loved ones as a result. However, we couldn't help everyone that needed support, which shows there is still more that can be done in partnership with this amazing charity. As always, we are proud of working with Carers Trust and look forward to helping more in future."

Richard Harris,
Chief Financial Officer

"I am writing to thank you and the Rank Group for the grant awarded to a carer I support recently for the purchase of a washing machine. The carer called me today to say how much of a difference it is making to her life and asked me to thank you on her behalf. Your support and that of the Rank Group is undeniably a life saver in these difficult times".

A support worker at Carers Trust

£283,019
Funds raised for Carers Trust in 2022/23

£3,476,782
Funds raised for Carers Trust since 2014

480
Number of carers supported in 2022/23

13,615
Number of carers supported since 2014

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Data tables

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').

We have reported against those metrics set out in the SASB Casinos & Gaming Standard, as well as selected metrics from the Software & IT Services and Multiline and Specialty Retailers & Distributors standards.

Governance

Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
General disclosures	Number of casino gaming tables	Number	SASB (Casinos & Gaming)	SV-CA-000.A	622	613	610
	Number of casino slots (Grosvenor B3/B4 machines)	Number	SASB (Casinos & Gaming)	SV-CA-000.B	1,343	1,385	1,385
	Number of active online gaming customers	Number	SASB (Casinos & Gaming)	SV-CA-000.C	1,201k	793k	821k
	Total area of casino gaming floor	m²	SASB (Casinos & Gaming)	SV-CA-000.D	32,906	Not recorded	Not recorded
Anti-corruption	Description of anti-money laundering policies and practices	n/a	SASB (Casinos & Gaming)	SV-CA-510a.1	Page 15		
	Total amount of monetary losses as a result of legal proceedings associated with money laundering	Reporting currency	SASB (Casinos & Gaming)	SV-CA-510a.2	0	0	0
	Number of hours per employee who undertook anti-money laundering training	Hours			1.9	0.2	0.2
	Total number of whistleblowing incidents reported and investigated	Number			12	8	6
	Total number of hours of staff training – Anti-Corruption	Hours			Male: 6,742 Female: 6,075		
	Number of reported cases due to unethical behaviour or corruption	Number			0		
	Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	Number			0		
	Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	Number			0		
Anti-competitive behaviour	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Reporting currency	SASB (Software & IT Services)	TC-SI-520a.1	0	0	0
Industry engagement	UK trade association meetings attendance	%			100%	100%	100%
	Contributions to consultations impacting Rank	Number			2	1	3
Compliance	Number of Personal Management Licence (PML) holders	Number			543	501	

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Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
Safer gambling	% of gaming facilities that implement the Responsible Gambling Index	% by revenue	SASB (Casinos & Gaming)	SV-CA-260a.1	Not applicable for Rank's operations	Not applicable for Rank's operations	Not applicable for Rank's operations
	% of online gaming operations that implement the National Council on Problem Gambling (NCPG) Internet Responsible Gambling Standards	% by revenue	SASB (Casinos & Gaming)	SV-CA-260a.2	Not applicable for Rank's operations	Not applicable for Rank's operations	Not applicable for Rank's operations
	% of gaming floor where smoking is allowed	% of gaming floor area	SASB (Casinos & Gaming)	SV-CA-320a.1	0% (Excludes outdoor smoking areas)	0% (Excludes outdoor smoking areas)	0% (Excludes outdoor smoking areas)
	Upheld breaches of advertising codes	Number			1	1	0
	Total spend on television and radio safer gambling advertising (Mecca and Grosvenor)	Reporting currency			£1.1m	£1.0m	£0.6m
	% of customers under 25 by	%					
	1) UK venues:				1) 22%	1) 23%	1) 21%
	2) Digital UK:				2) 9.61%	2) 12%	2) 12%
	3) Spanish digital:				3) 13%	3) 8.40%	3) 7.50%
	% of customers who are under 25 with whom Rank have had safer gambling interaction (UK digital)	%			1.30%	2%	2%
	Number of safer gambling interactions (UK digital)	Number			291,706	257,077	444,239
	Total Research, Education and Treatment (RET) contribution (UK operations)	Currency			£576k	£402k	
	Number of breaches in no under-18s policy (UK operations)	Number			18	6	1
	Average number of hours of safer gambling training completed per employee	Hours			2.1	2.4	2.1
	Percentage of employees who completed mandatory safer gambling training on e-learning platform	%			100%	98%	97%
	Number of non-compliance related to product responsibility	Number			0		
Health and safety	Number of accidents (UK venues)	Number			456	1,130	383
	Number of accidents reported under RIDDOR (UK venues)	Number			1	2	2
	Number of colleagues that completed Health and Safety training (Excludes Spanish operations)	Number			6,597	5,669	4,300
Customer privacy and IT security	Total identified leaks of customer data	Number			7		
	Total number of identified thefts of customer data	Number			1		
	Total number of identified losses of customer data	Number			2		
	Description of policies and practices relating to behavioral advertising and user privacy	n/a	SASB (Software & IT Services)	TC-SI-220a.1	pg.23, 25		
	Number of users whose information is used for secondary purposes	Number	SASB (Software & IT Services)	TC-SI-220a.2	167	545	430
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Reporting currency	SASB (Software & IT Services)	TC-SI-220a.3	0	0	0

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Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
Customer privacy and IT security	(1) Number of law enforcement requests for user information,	Number,	SASB (Software & IT Services)	TC-SI-220a.4	1) 134	1) 101	1) 62
Continued	(2) Number of users whose information was requested,				2) 160	2) 111	2) 84
	(3) Percentage resulting in disclosure	Percentage (%)			3) 71%	3) 75%	3) 80%
	(1) Number of data breaches,	Number,	SASB (Software & IT Services)	TC-SI-230a.1	1) 14	1) 14	1) 11
	(2) Percentage involving personally identifiable information (PII),	Percentage (%)			2) 78%	2) 43%	2) 64%
	(3) Number of users affected	Number			3) 425	3) 660	3) 1,060
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	n/a	SASB (Software & IT Services)	TC-SI-230a.2	Page 23		
	Number of performance issues and service disruptions	Number	SASB (Software & IT Services)	TC-SI-550a.1	173	152	209
	(1) Number of licenses or subscriptions	Number	SASB (Software & IT Services)	TC-SI-000.A	1) 61	1) 55	1) 57
	(2) Percentage cloudbased	Percentage (%)			2) 47%	2) 24%	2) 24%
	(1) Amount of data storage	Petabytes	SASB (Software & IT Services)	TC-SI-000.C	1) 227 TB	1) 335 TB	1) 340TB
	(2) Percentage outsourced	Percentage (%)			2) 53%	2) 43%	2) 39%
	Number of hours per employee who have undertaken data protection and security training	Hours			0.92	0.46	0.46
	% of colleagues who have undertaken data security training	%			97%	92%	91%
	Statutory report of personal data breach to the regulator	Number			0	0	1
Customer satisfaction	Customer complaints to Director's Resolution Office (UK operations)	Number			141	79	104

Colleagues

Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
Employment	Number of employees by gender (Full-time + part-time)	Number					
	1) Male:				1) 3864	1) 3,952	1) 3,910
	2) Female:				2) 3388	2) 3,618	2) 3,611
	Number of employees by age group (Full-time + part time)	Number					
	1) <30 years old:				1) 2278	1) 30%	1) 28%
	2) 30-50 years old:				2) 3243	2) 46%	2) 48%
	3) >50 years old:				3) 1731	3) 24%	3) 24%
						(as % of colleagues)	(as % of colleagues)
	Number of employees by geographical region (Full-time + part time)	Number					
	1) UK:				1) 6,085	1) 6,549	1) 6,515
	2) Gibraltar:				2) 75	2) 73	2) 63
	3) Israel:				3) 33	3) 34	3) 38
	4) Mauritius:				4) 328	4) 286	4) 254
	5) South Africa:				5) 97	5) 79	5) 46
	6) Spain:				6) 594	6) 509	6) 567
	7) Malta:				7) 40	7) 40	7) 35

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Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
Employment Continued	Number of employees by employment category	Number					
	Senior management:				11		
	Management:				551		
	Non-management				6690		
	Number of non-compliance due to use of child labour and/ or forced labour	Number			0		
	Total amount of fines due to use of child labour and/or forced labour	HKD			0		
	% of employees located offshore	%	SASB (Software & IT Services)	TC-SI-330a.1	0	0	0
	Employee engagement as a percentage	%	SASB (Software & IT Services)	TC-SI-330a.2	72%	68%	65%
	Average hourly wage	Currency	SASB (Multiline and Specialty Retailers & Distributors)	CG-MR-310a.1	Mecca venues: £10.80	£9.76	£9.01
					Grosvenor venues: £12.20	£10.92	£9.97
					Enracha venues: €12.76	€12.40	€10.20
	Percentage of in-store employees earning minimum wage, by region	%	SASB (Multiline and Specialty Retailers & Distributors)	CG-MR-310a.1	Mecca venues: 59%	70%	78%
					Grosvenor venues: 0%	28%	60%
					Enracha venues: n/a	n/a	n/a
	Voluntary turnover rate for in-store (venues) employees	%	SASB (Multiline and Specialty Retailers & Distributors)	CG-MR-310a.2	Mecca venues: 35%	40%	19%
					Grosvenor venues: 44%	52%	21%
					Enracha venues: 3%	4%	4%
	Involuntary turnover rate for in-store (venues) employees	%	SASB (Multiline and Specialty Retailers & Distributors)	CG-MR-310a.2	Mecca venues: 23%	9%	11%
					Grosvenor venues: 14%	11%	5%
					Enracha venues: 0.5%	13%	1%
	Total amount of monetary losses as a result of legal proceedings associated with labor law violations	Currency	SASB (Multiline and Specialty Retailers & Distributors)	CG-MR-310a.3	Only in respect of cases gone to hearing; lost tribunal claim in September 2022 and paid circa £4K in compensation	Only regarding court proceedings, £0	Only regarding court proceedings, £0
	Number of Town Halls	Number			12	11	13
Occupational health and safety	Number of non-compliance related to health and safety	Number			0		
	% of gaming staff who work in areas where smoking is allowed	% of man hours	SASB (Casinos & Gaming)	SV-CA-320a.2	3%	0%	0%

Data tables
Continued

Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
Training and education	% of management roles on leadership training programmes	%			34%	28%	7%
	Number of colleagues who have been trained by Grosvenor to be licensed dealers	Number			418	440	0
	Number of apprenticeships started in the year	Number			68	75	14
	Number of hours of voluntary training completed	Hours			93,692	75,626	7823
Diversity and equal opportunity	Percentage of employees that are women	%			47%	48%	48%
	Gender pay gap	%			11.6% (This was the median gender pay gap figure for April 2022)		
	ED&I Employee Opinion Survey ('EOS') score	Number			8.3/10 (This was the average engagement score across the Group for the survey conducted in October 2022)		

Environment

Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
Waste and water	Amount of hazardous waste	Tonnes			3.89	0.54	1.31
	Amount of non-recycled waste	Tonnes			1,149	158	124
	Amount of recycled waste	Tonnes			1,053	391	1,009
	Amount of non-hazardous waste	Tonnes			2,202.00	549.26	1,133.00
	Non-hazardous waste management method - Incineration	Tonnes			857.00	158.05	124.00
	Total water usage	m³	SASB (Software & IT Services)	TC-SI-130a.2	206,498	214,625	209,259
Energy	Total energy consumed	Gigajoules (GJ)	SASB (Software & IT) SASB (Casinos & Gaming) SASB (Multiline and Specialty Retailers & Distributors)	TC-SI-130a.1 SV-CA-130a.1 CG-MR-130a.1	Reported in kWh - 124,618,023	Reported in kWh - 128,827,425	Reported in kWh - 104,383,088
	Percentage grid electricity	%	SASB (Software & IT) SASB (Casinos & Gaming) SASB (Multiline and Specialty Retailers & Distributors)	TC-SI-130a.1 SV-CA-130a.1 CG-MR-130a.1	57%	100%	100%
	Percentage renewable energy	%	SASB (Software & IT) SASB (Casinos & Gaming) SASB (Multiline and Specialty Retailers & Distributors)	TC-SI-130a.1 V-CA-130a.1 CG-MR-130a.1	43%	0%	0%

Communities

Topic	Metrics	Unit of measurement	SASB Standard	SASB Code	2022/23	2021/22	2020/21
Communities	Funds raised for Carers Trust	Reporting currency			£283,019	£284k	£267k
	Funds raised for Carers Trust since 2014	Reporting currency			£3,476,782		
	Number of carers supported	Number			480	525	566
	Number of carers supported since 2014	Number			13,615		

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Rank Group plc has reported the information cited in this GRI content index for the period 1 July 2022 to 30 June 2023 with reference to the GRI Standards.

GRI standard/other source	Disclosure	Location
GRI 2: General Disclosures 2021	2-1 Organizational details	pg.2, 4
	2-2 Entities included in the organization's sustainability reporting	pg.4
	2-3 Reporting period, frequency and contact point	pg.2
	2-4 Restatements of information	pg.44
	2-5 External assurance	Annual Report
	2-6 Activities, value chain and other business relationships	pg.4, 14, 15
	2-7 Employees	pg.54, 55
	2-9 Governance structure and composition	pg.10
	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	pg.10-13
	2-13 Delegation of responsibility for managing impacts	pg.10, 13
	2-14 Role of the highest governance body in sustainability reporting	pg.10
	2-15 Conflicts of interest	Annual report
	2-16 Communication of critical concerns	pg.15
	2-17 Collective knowledge of the highest governance body	pg.29
	2-18 Evaluation of the performance of the highest governance body	pg.29
	2-19 Remuneration policies	pg.11-13 and Annual report
	2-20 Process to determine remuneration	pg.11, Annual report
	2-22 Statement on sustainable development strategy	pg.5-6
	2-23 Policy commitments	pg.15
	2-24 Embedding policy commitments	pg.15
	2-25 Processes to remediate negative impacts	pg. 15
	2-26 Mechanisms for seeking advice and raising concerns	pg.15
	2-27 Compliance with laws and regulations	pg.13
	2-28 Membership associations	pg.14
	2-29 Approach to stakeholder engagement	pg.2, 8, 14
GRI 3: Material Topics 2021	3-1 Process to determine material topics	pg.2
	3-2 List of material topics	pg.7, 16, 27, 35, 47
	3-3 Management of material topics	Throughout this Sustainability Report and the Annual Report
GRI 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	pg.40-43
	201-3 Defined benefit plan obligations and other retirement plans	pg.32
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	n/a since no minimum wage offered
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	pg.56
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	pg.15
	205-3 Confirmed incidents of corruption and actions taken	pg.15
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	pg.52
GRI 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

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GRI standard/other source	Disclosure	Location
GRI 302: Energy 2016	302-1 Energy consumption within the organization	pg.56
	302-2 Energy consumption outside of the organization	pg.45
	302-3 Energy intensity	pg.35
	302-4 Reduction of energy consumption	pg.45
GRI 303: Water and Effluents 2018	303-5 Water consumption	pg.56
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	pg.45
	305-2 Energy indirect (Scope 2) GHG emissions	pg.45
	305-3 Other indirect (Scope 3) GHG emissions	pg.45
	305-4 GHG emissions intensity	pg.35
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	pg.56
	306-3 Waste generated	pg.45
	306-4 Waste diverted from disposal	pg.38
	306-5 Waste directed to disposal	pg.56
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	pg.55
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	pg.25
	403-3 Occupational health services	pg.33-34
	403-4 Worker participation, consultation, and communication on occupational health and safety	pg.33
	403-5 Worker training on occupational health and safety	pg.25
		pg.32
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	pg.25
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	pg.21 (Average training hours per employee on safer gambling)
		pg.23 (Average training hours per employee on data protection and security)
		pg.54 (Average training hours per employee on anti-money laundering)
		pg.55 (Total hours of training)
	404-2 Programs for upgrading employee skills and transition assistance programs	pg.29
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Data table
	405-2 Ratio of basic salary and remuneration of women to men	pg.31
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	pg.24, 53
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	pg.22
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	pg.18
	417-2 Incidents of non-compliance concerning product and service information and labeling	pg.53
	417-3 Incidents of non-compliance concerning marketing communications	pg.25
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	pg.23

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