

Prohibition of Trafficking in Persons Policy California Transparency in Supply Chains Act of 2010 UK Modern Slavery Act of 2015

As a business we have a responsibility to be alert to the risks of modern slavery and human trafficking and to prevent Prevention of Slavery and Human Trafficking within the Workplace. however small, in our business and in the wider supply chain. Staff is expected to report concerns and management is expected to act upon them.

We expect all who have or wish to have a business relationship with Park Place Technologies (PPT) and/or any member of our Organization, to familiarize themselves with our anti-slavery values and to always act in a way which is consistent with our anti-slavery values.

As a corporation we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We fully expect our employees and business associates to act in this way and to assist in the implementing and enforcement of effective systems and controls to ensure modern slavery is not taking place in our own businesses or those of our suppliers.

As part of our culture of good governance for good business, we operate to a set of core values that are reflected in our relationships with our customers, suppliers and team members. Our business values and relationships reflect our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can within our own business dealings. We expect and demand the same attitude of all those who work for us and expect it of all with whom we work with.

The California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015 require certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. The disclosures are intended to provide consumers the ability to make better, more informed choices about the products and services they buy and the companies they support. In addition, the United States Federal Government has adopted a zero-tolerance policy regarding trafficking in persons. As a federal contractor, Park Place Technologies and its employees are prohibited from:

ETHICAL TREATMENT

Supply chain ethics are integral to Park Place Technologies. If something does not feel right or does not pass the "smell test," you should proceed with caution. Seek guidance from the Legal Department. Ask questions before you act.

- Engaging in any forms of trafficking in persons.
- Procuring commercial sex acts; or using forced labor in the performance of any contract.
- Using child labor (child: anyone under the age of sixteen unless local law states otherwise) in the performance of any contract.





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- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands.

All employees and suppliers who work or may work on service or other contracts on behalf of Park Place Technologies must comply with this policy. Violation of this policy may subject an employee or supplier to actions that include, but are not limited to, removal from a particular role, reduction in benefits, termination, and/or disciplinary action in accordance with the Park Place Technologies Employee Handbook or contract, as applicable.

What Are My Responsibilities?

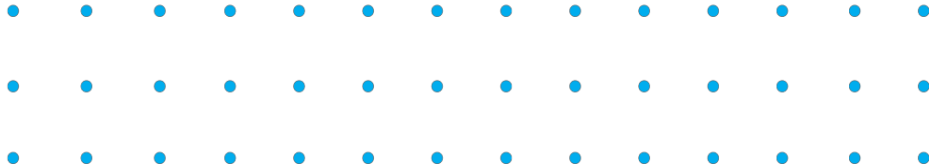
All officers, employees, and agents of Park Place who purchase items on behalf of Park Place, are responsible for understanding and complying with this Policy as it relates to their jobs. It is the individual responsibility of each director, officer, employee, agent, and supplier to:

- Comply with this Policy and anti-slavery laws and the Code of Business Ethics
- Be familiar with applicable aspects of the Policy and communicate them to subordinates
- Ask questions if the Policy or action required in a particular situation is unclear
- Properly manage and monitor business activities conducted through third parties
- Be alert to indications or evidence of possible wrongdoing
- Participate in training as directed
- Promptly report violations or suspected violations through appropriate channels

DOES THIS IMPACT YOU?

This policy applies to Park Place supply chain. From time to time, Park Place uses independent contractors or agents to conduct specific business transactions. This policy also applies to them.





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Training and Awareness Program

- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff, particularly in our procurement teams.
- All Directors and Senior Managers have been briefed on the subject and the Company's Prohibition of Trafficking in Persons Policy has been made available to all employees on the company's intranet.
- Additionally, sections within our Employee Handbook have been added to cover where to find these policies, and procedures for reporting any suspected

In addition, the Company's managers have a particular responsibility to:

- Ensure that subordinates, including agents and suppliers, receive the training needed to understand laws and regulations governing international transactions particularly as they relate to their assigned work
- Monitor compliance with this Policy
- Raise concerns regarding this Policy, the FCPA and other Anti-Corruption and Anti-Bribery Laws or the Company's Code of Business Ethics, including any suspected
- violations, to management, the Legal Department or by contacting the Park Place
- "Hotline", which permits anonymous reporting.
- Maintain full and accurate records with respect to transactions subject to this Policy

Terminology

- Trafficking in persons includes the following:

Coercion

- Threats of serious harm to or physical restraint against any person.
- Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or
- The abuse or threatened abuse of the legal process.

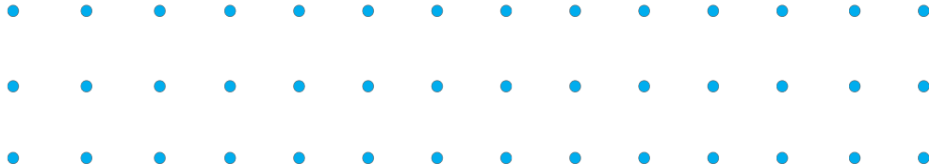
Commercial Sex Act

- Any sex act on account of which anything of value is given to or received by any person.

Debt Bondage

- The status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.





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Forced Labor/Labor Trafficking

- Knowingly providing or obtaining the labor or services of a person:
 - By threats of serious harm to, or physical restraint against, that person or another person.
 - By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint.
 - By means of the abuse or threatened abuse of law or the legal process.

Involuntary Servitude – Includes a condition of servitude induced by means of:

- Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint.
- The abuse or threatened abuse of the legal system.

Severe forms of trafficking in persons

- Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.
- The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Sex trafficking

- The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act in order to receive money, goods, or services in return.

What Due Diligence Is Required?

- Park Place Technologies will verify the qualifications, background and references of all the business partners, agents, representatives, suppliers, or consultants with which Park Place intends to engage or establish a binding business relationship. The Legal Department and senior management shall provide guidance on the level of due diligence required for a particular business arrangement. All required due diligence must be conducted prior to entering into any contractual or binding agreement.



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Pay Attention to Red Flags

Employees therefore must be alert to potential “red flags” in transactions with supply chain. This means that you should pay particular attention to unusual or suspicious circumstances that may indicate possible legal or ethics concerns. These are commonly referred to as “red flags.” “Red flags” are circumstances that may suggest refurbished parts have been procured unethically and the prices are low because the workers have not been paid a minimum wage for their work. The presence of red flags in a relationship or transaction requires greater scrutiny and implementation of safeguards to prevent and detect improper conduct. Ignoring these circumstances is not appropriate. If something does not seem right, you should seek further guidance from the Legal Department.

“Willful ignorance” is not a defense. “Willful ignorance” includes not making reasonable inquiry when there are suspicious circumstances. It also does not matter whether the agent or intermediary is itself subject to the California Transparency in Supply Chains Act of 2010, UK Modern Slavery Act of 2015, or other anti-slavery laws.

NO DEFENSE

“Willful ignorance” is not a defense. “Willful ignorance” includes not making reasonable inquiry when there are suspicious circumstances. It also does not matter whether the agent or intermediary is itself subject to the FCPA, the UK Bribery Act or other Anti-Corruption or Anti-Bribery Laws.

What Are My Reporting Obligations?

Any employee who has reason to believe that a violation of this Policy has occurred, or may occur, must promptly report this information to his or her supervisor, any member of management or the Legal Department, or by contacting the Park Place Technologies Hotline. Specifically, information may be

reported in confidence by calling the Park Place General Counsel at (001) 440-947- 0213. Retaliation in any form against an employee who has, in good faith, reported a violation or possible violation of this Policy is strictly prohibited. Additionally, the Park Place “Hotline” may be used for anonymous reporting. The Hotline may be reached at 833-350-0044 or worldwide at www.lighthouse-services.com/parkplacetech

General Counsel
(001) 440-947-0213
legal@parkplacetech.com
Hotline
833-350-0044
www.lighthouse-services.com/parkplacetech

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Additional Relevant Policies

The organization operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Hotline and Whistleblowing Policy** - The organization encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organization. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organization has a hotline, available to all employees and posted in all offices and on the company internal intranet, designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can also contact our Legal or HR Department who will advise complainant of the relevant Company Director/investigating Officer in line with this policy.
- **Employee Handbook & Code of Conduct** - The Organization's Employee Handbook and Code of Conduct makes clear to employees the actions and behavior expected of them when representing the organization.

CORRECTIVE ACTIONS

Violations of this Policy will result in corrective action that may include, but is not limited to, verbal or written warnings, suspension from work, or other disciplinary action up to and including employment termination. Verbal or written corrective action is intended to eliminate inappropriate workplace conduct of a more minor nature. Immediate termination without use of progressive discipline may be appropriate for serious incidents.

What Are the Consequences of Violations?

Violations of this Policy will result in corrective action that may include, but is not limited to, verbal or written warnings, suspension from work, or other disciplinary action up to and including employment termination. Verbal or written corrective action is intended to eliminate inappropriate workplace conduct of a more minor nature. Immediate termination without use of progressive discipline may be appropriate for serious incidents.

Applicability

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our organization's Slavery and Human Trafficking Statement for the current financial year

This Policy statement is communicated to all employees. Documents are classified as Public or Private. Public Policies are available on the Company Intranet. Private Policies can be made available to interested parties, on request. This Policy will be reviewed for continuing suitability by Executive Leadership at least annually.

Betsy Dellinger
Senior Vice President & General Counsel

Date: 11 August 2020