

Code of Business Conduct

William Hill is committed to conducting its operations with honesty and integrity and with a respect for human rights and the interests of our employees and shareholders. We similarly respect the legitimate interests of those with whom we do business and who are affected by our operations.

This Code of Business Conduct has been approved by the William Hill PLC Board and sets out the basic principles which we expect all to comply with across the Group. This is supplemented by more detailed policies and procedures in a number of areas which are communicated to employees as appropriate.

Legal compliance

William Hill seeks to comply with relevant laws and regulations which apply to the Group's operations.

Bribery, corruption or fraud

We will not tolerate any forms of bribery, corruption or fraud. Employees should avoid accepting hospitality or gifts which might appear to be excessive or place them under any obligation or commitment.

Resources

Employees should preserve a distinction between the Group's property and their own and should be careful not to abuse company assets for their own personal purposes.

Responsible gambling

William Hill appreciates that whilst, for most customers, gambling is an enjoyable leisure activity, for a very small number who experience problems gambling can cease to be fun. We encourage social responsibility within the betting and gaming industry and within our own organisation. We provide training to our employees and expect them to follow the Group's policies and procedures regarding responsible and underage gambling.

Money laundering and proceeds of crime

We take seriously our legal obligations regarding money laundering and handling the proceeds of crime, and will comply with any relevant industry codes of practice. Our Head of Security has responsibility for overseeing the Group's procedures in this area and relevant training is provided to our employees.

Diversity

We are committed to diversity in the working environment and will not tolerate harassment, discrimination or victimisation in the workplace. We will recruit, employ and promote employees on the basis of their qualifications and abilities.

Working conditions

We are committed to safe and healthy working conditions for our employees and expect our employees to comply with their own obligations in this area. We encourage our employees to maximise their potential by developing and enhancing their skills and capabilities and will provide training and development opportunities where appropriate.

Communications

We value open communication both internally and externally. We maintain good communications with employees through company-based information and consultation procedures and will listen to the views of key stakeholders. Employees should be honest and straightforward in all company communications.

Customer service

We are committed to dealing with our customers in a fair, open and honest way, and to providing high standards of service. We will operate effective complaints procedures to deal with situations where those standards may not be met and will abide by the decisions of the Independent Betting Arbitration Service.

Shareholders

We will conduct our operations in accordance with accepted principles of good corporate governance.

Public activities

We will promote and defend the legitimate business interests of the William Hill Group. We will co-operate with the UK government and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect our legitimate business interests. William Hill will not make donations to political parties.

Charitable donations

We recognise our wider social responsibility by seeking to support the communities in which we operate through our charitable donations. The Group has adopted a charitable donations policy which sets out the focus of our charitable giving.

Environment

William Hill will work towards minimising the environmental impact of our operations.

Competition

William Hill believes in vigorous yet fair competition and supports the development of appropriate competition laws. William Hill companies and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.