Rank Group





Generating long-term sustainable stakeholder value

Sustainability Report 2024

About this report

Basis of preparation

This report presents a review of The Rank Group Plc's ('Rank' or 'the Group') approach to, management of, and performance as it relates to Environmental, Social and Governance ('ESG') issues which are material to the business. The report covers the period from 1 July 2023 to 30 June 2024 ('2023/24').

The Group is dedicated to ensuring the sustainability of its operations by aligning its processes and policies to international best practice. This is part of its strategy to build an even more resilient and responsible business. Rank's stakeholders will have the opportunity to review the Group's activity and performance and to contact Rank with suggestions or comments to improve its accountability and transparency commitments.

Reporting standards and frameworks

This report has been informed by several globally recognised voluntary ESG reporting frameworks. Rank has disclosed the Group's non-financial performance in line with the Sustainability Accounting Standards Board ('SASB') industry standard for Casinos & Gaming, as well as material metrics and disclosures from the Multiline and Specialty Retailers & Distributors, and Software & IT Services SASB standards.

This report was also developed with reference to the Global Reporting Initiative ('GRI'). Rank has advanced its reporting in line with the recommendations of the Task Force on Climate-related Financial Disclosures ('TCFD') which is mandated for listed companies in the UK

The Group is also aware of incoming regulatory standards resulting from its areas of operation. The International Sustainability Standards Board ('ISSB') and the EU's Corporate Sustainability Reporting Directive ('CSRD') have both been established with the objective of standardising sustainability reporting. While Rank is not required to report to either for 2023/24, we have already commenced our review of the underlying disclosure requirements of both the ISSB and CSRD in order to be well positioned to meet these future statutory requirements.

In line with the CSRD's requirement to apply a materiality-based assessment of the Group's obligation to disclose certain performance areas, Rank conducted its first double materiality exercise, against the requirements of the European Sustainability Reporting Standards ('ESRS') (the framework for achieving compliance with the CSRD). The International Financial Reporting Standards ('IFRS') S1 and S2 (the standards established by the ISSB), build upon existing reporting frameworks, including the TCFD and SASB, both of which the Group already reports against.

In line with the Government's legally binding commitment to transition to a net zero economy by 2050, Rank is committed to reaching net zero emissions by 2050. Rank has set an interim target for all operations to reach net zero on Scope 1 and 2 emissions and selected Scope 3 emissions by 2035. Rank has continued to develop its Net Zero Pathway which provides the roadmap to achieving its targets and plans to align these targets with the Science Based Targets initiative ('SBTi').

SASB GRI

TCFD TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES



Grosvenor, Luton

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Who we are

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

Our Purpose

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

To excite and to entertain.

Our brands

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Grosvenor Casinos

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 gaming machines alongside bars, restaurants and broader entertainment experiences.



Grosvenor, Leicester

Mecca

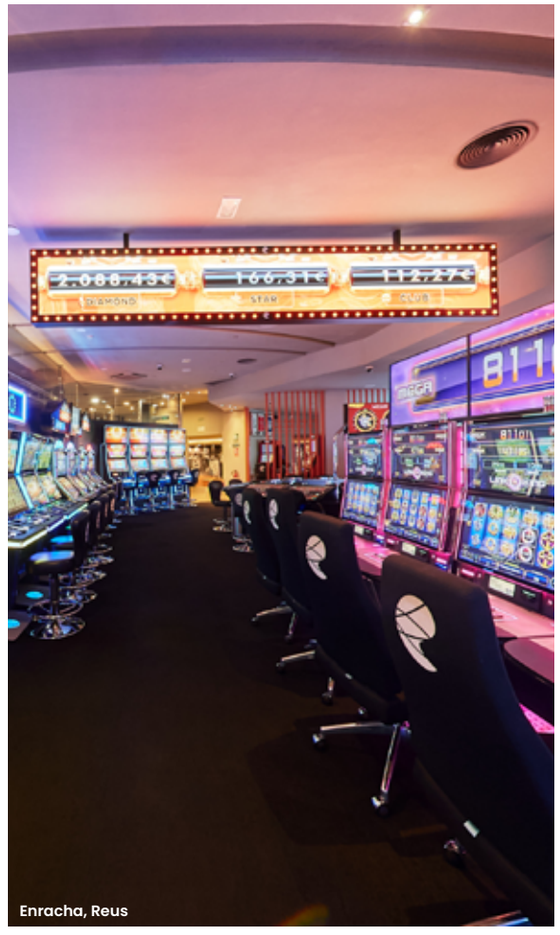
Mecca is Rank's community-gaming brand for the British market. A national portfolio of 52 venues offering bingo, gaming machines, great value food and drink, and live entertainment.



Mecca, Hull

Enracha

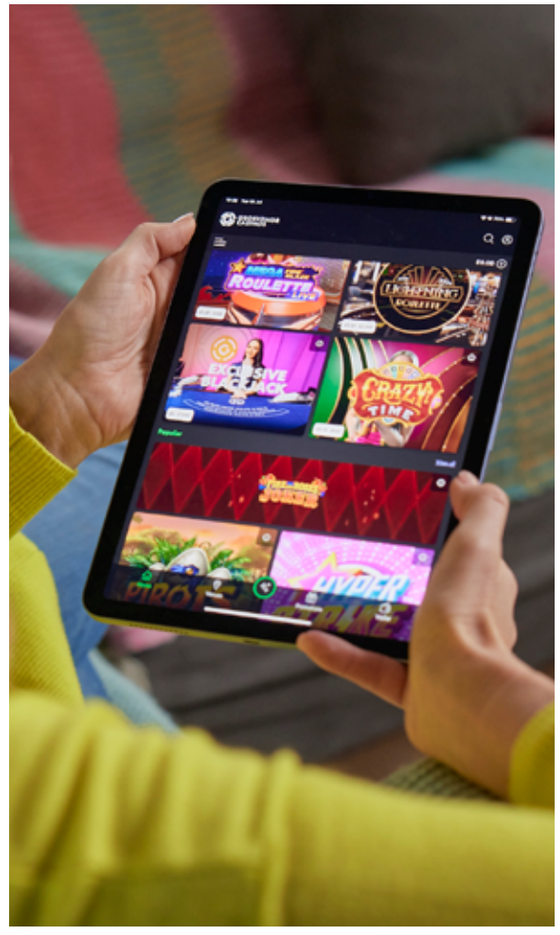
Enracha is Rank's community-gaming business for the Spanish market. Nine venues offering a range of popular community games like bingo as well as electronic casino and slot games, sports betting, great value food and drink, and live entertainment.



Enracha, Reus

Digital

Our digital portfolio includes our established market-leading brands, Mecca and Grosvenor for the UK market and Yo for the Spanish market. The Group also operates over 80 UK digital-only brands via our proprietary technology platform and third-party platforms.



Our culture

Rank's culture encourages colleagues to take ownership of their roles and promotes collaborative working to create supportive work environments. Upholding our core values of **Service, Teamwork, Ambition, Responsibility and Solutions ('STARS')**, Our colleagues are empowered to play an active role in driving Rank's culture, influencing organisational behaviours, decision-making processes and interpersonal dynamics, everything which impacts the Group's performance, strategic ambitions, sustainable growth and profitability.

Our values

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

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

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

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

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

Grosvenor, Luton

2024 highlights

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Conducted a double materiality assessment, establishing the impact and financial materiality of our key impacts, risks and opportunities

Achieved an Advanced Level 2 "Gold" safer gambling standard accreditation from GamCare for all our UK businesses

Continued to drive progress and deliver for our stakeholders across our four focus areas of Customers, Colleagues, Environment and Communities

Customers

Customer Net Promoter Score ('NPS')*

↑ 52

Employee NPS on safer gambling*

↑ 69

Customer feedback scores on safer gambling

↑ 84%

UK digital customers using safer gambling tools**

↑ 31%

Created a player protection function, bringing together our safer gambling and customer due diligence teams, to improve the support we provide to our customers.

Utilised new technology to increase the capacity of our customer service teams and our ability to respond to customers.

Continued to ensure strong awareness for safer gambling through customer communications and employee training.

* An average for last three months of the year and this Group score is a weighted average of all business units scored based on NGR % contributions.
** This is the total active customers that have used safer gambling tools during the year.

Colleagues

Employee Net Promoter Score ('eNPS')

↑ 39

Percentage of women in senior roles*

↓ 34%

Employee engagement score**

79%

Launched Connect, our new global communications and engagement platform, enhancing our ability to communicate and connect with colleagues, especially those in our venues.

Achieved a reduction in the gender pay gap and an increase in female representation.

Continued to roll out our employee value proposition, Work. Win. Grow., across our brands and working to embed it into every element of the colleague experience.

Expanded our colleague mentoring programme to 150 colleagues.

* Position at 30 June 2024.
** We will be using employee engagement score rather than eNPS as an indicator for colleague sentiment going forwards.

Environment

Absolute carbon emissions tCO_2e*

↓ 22,112

Completed asset-level energy consumption data gathering at 40 highest-energy-consuming venues in UK estate and commenced detailed Scope 3 assessment across all relevant categories for the business's value chain.

Completed Scope 1, 2 and 3 baselining for Spanish operations.

Signed a power purchase agreement in the UK to enable use of electricity from renewable energy providers.

Launched programme of engagement to motivate colleagues to join the effort to reduce energy consumption.

Launched a new Supplier Code of Conduct which includes the expectation for suppliers to share environmental performance with Rank.

* This is calculated using Scope 2 market-based emissions.

Communities

Total charitable funds raised

↑ £323k

Delivered on a calendar of events to raise funds for our Group-wide charity partner, Carers Trust, and celebrated the 10-year anniversary of this partnership, during which we have raised over £3.7m for this deserving charity.

Supporting local people in the communities we operate in by creating employment opportunities and promoting job vacancies through job centres and other local bodies.

Raised over £58,000 in donations for over 60 local causes.

Chief Executive's introduction

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John O'Reilly
Chief Executive

Dear Stakeholder,

I am pleased to present Rank's 2024 Sustainability Report, showcasing our progress and dedication to sustainable and responsible business practices.

This is our third formal disclosure related to Rank's non-financial performance and continues to elevate a range of measures that seek to demonstrate broader value creation beyond financial progress. And whilst we have historically drawn guidance from industry-leading voluntary standards, this report begins our journey towards alignment with a more regulatory driven framework whilst maintaining our continued focus on customers, colleagues, the environment and our communities.

Our commitment to our customers is unwavering. We continue to prioritise the safety of our customers, going beyond compliance to minimise the risk of harmful play, whilst also ensuring that they enjoy a frictionless experience. By harnessing increasingly advanced data modelling, we have been able to identify vulnerable customers with greater precision. Furthermore, we are utilising new technologies to enhance our proposition, improving customer service response times and bolstering our detection of at-risk behaviours. These measures are part of our ongoing efforts to safeguard our customers whilst delivering an exciting and entertaining experience.

Our colleagues are at the heart of what we do. This year, we have focused on weaving our employee value proposition – Work. Win. Grow. – into every facet of our operations. We believe that investing in our people is crucial to our success. To ensure our valued venue colleagues are engaged and aware of developments within our business, we launched the Connect platform.

All our colleagues can now access company information much more easily online or through an app on their phone, which is already fostering a stronger connection between our colleagues and the business. This year, we are proud to have an employee engagement score of 79%, up 7 percentage points, and an employee NPS score of 39, up from 14 in the prior year.

Our journey towards a sustainable future continues to gain momentum. We have made significant progress on our Net Zero Pathway, including the completion of baselining energy use data in our 40 highest-consuming venues in the UK. Additionally, we have completed Scope 1, 2 and 3 emissions baselining for all our Spanish venues. This year, we commenced our Scope 3 assessment in the UK which will include engaging with suppliers to gain a complete picture of our emissions profile across the value chain.

The success of our decarbonisation efforts relies in part on the actions of our colleagues. Engaging colleagues and raising awareness for more energy-conscious behaviours, such as through our lighting initiative, have therefore been a key focus. The use of energy consumption monitoring has been valuable in demonstrating the immediate effect of behavioural change on energy use, and introducing monthly league tables has been a great success in encouraging our venues' teams to think about energy use. As a result of these efforts, we have already seen a 12% year on year reduction in energy use in our UK venues, underscoring the effectiveness of our early initiatives.

This year, we celebrated 10 years of our partnership with Carers Trust, raising £323,114.44 in the year for this deserving charity. It has been inspiring to see our colleagues participate in various fundraising initiatives, demonstrating our collective commitment to making a positive impact, and we look forward to continuing to work with Carers Trust.

> **"High standards of business conduct underpin everything we do at Rank."**

Beyond our Group-wide charity partnership, Rank continues to occupy a central role in the communities where we operate. As such, we want to support local need, whether that is providing spaces in our venues for groups to use as meeting places or for events, or Group-wide fundraising for charities and local initiatives. This year, our colleagues have supported a wide range of causes close to their hearts and, through bake sales to sponsored runs, have raised over £58,000 in donations. Our ongoing community engagement reflects our dedication to supporting and enriching the lives of those around us.

High standards of business conduct underpin everything we do at Rank. Compliance remains a central focus, and we ensure that we act in accordance with all relevant regulations in each of our operating locations. Anticipating the impact of new regulations on sustainability reporting, we have proactively begun to align our disclosures to meet these requirements.

This year, we conducted a double materiality process to better position ourselves for future reporting obligations, reaffirming our commitment to transparency and accountability.

As we look back on the achievements of 2023/24, we are proud of our progress and remain steadfast in our commitment to sustainable and responsible business practices.

John O'Reilly
Chief Executive

Double materiality assessment

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Purpose

We firmly believe in the principles of materiality to support a deeper appreciation of our sustainability-related impacts, risks and opportunities. Double materiality requires consideration of the materiality of sustainability issues from both an impact materiality ('inside-out') and financial materiality ('outside-in') perspective.

Conducting such an assessment this year also prepares the business for alignment to the EU's Corporate Sustainability Reporting Directive ('CSRD'), which will impact our reporting due to our operations in Spain. We also have a clear understanding as to which disclosure topics of the European Sustainability Reporting Standards ('ESRS'), the framework for achieving compliance with the CSRD, the business will be required to disclose against.

By completing this exercise, we have enhanced our ability to manage sustainability risks, seize opportunities and either mitigate or maximise any negative or positive impacts, as well as positioning ourselves effectively to meet future regulatory requirements.

Approach

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

Our sustainability consultants supported on the scoping and development of the process, and discussed the process with auditors to ensure the approach taken was effective.

The process was launched at Group-level, whilst in Spain the team concurrently began their business unit-level double materiality assessment.

Methodology

1. Provided description of material issue.
   Informed by 2021 materiality assessment as well as globally recognised ESG frameworks and standards and industry knowledge.
2. Provided description of inside-out positive and negative impacts, whether actual or potential, and list of the metrics used to measure the actual impacts.
   Aligned to the risks described in Group Risk Register.
3. Provided description of the outside-in positive and negative risks and opportunities, whether actual or potential, and list of the metrics used to measure the actual risks and opportunities.
   Aligned to the risks described in Group Risk Register.
4. Provided description of any preventative or positive actions and/or mitigating measures in place.
5. Considered the impact materiality of the identified impacts and rated on the defined scoring system, considering scale, likelihood, and the preventative/mitigating measures in place, and the materiality over the short, medium and long terms, providing qualitative explanation for scoring.
6. Considered the financial materiality of the identified risks and opportunities and rated on the defined scoring system, considering the financial impact across six parameters (cash flows, development, performance, position, cost of capital and access to finance), the preventative/mitigating measures in place and the materiality over the short, medium and long terms, providing qualitative explanation for scoring.

Scoring system

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

For impact materiality, this meant scoring each impact on a scale of 1 to 5. For financial materiality, this meant scoring each risk or opportunity based upon its forecasted percentage impact on cash as a percentage of Earnings Before Interest and Tax ('EBIT'). The percentage ranges used were the same as those in the Risk Register to maintain consistent methodologies for these related assessments.

Scoping and set up

- ESG Working Group established the parameters and objectives of the double materiality exercise, supported by our sustainability consultants.
- Double materiality workbook created, with reference to the Group Risk Register.

Workshop 1

- Double materiality workbook presented to Executive Committee and members of Senior Management to educate on process and objectives.
- Conducted a preliminary assessment of the chapters of the ESRS.

SME engagement

- Individual calls conducted with 21 subject matter experts ('SMEs') across the business to review the impacts, risks and opportunities identified relevant to their functions, as well as the corresponding preventative and mitigating measures in place.
- Scoring from SMEs on the impact and financial materiality of each impact, risk and opportunity was received.

Results consolidation

- SME responses consolidated.
- ESG Working Group reviewed the entire workbook and resolved any differences in scoring between SMEs, ahead of presentation in the second workshop.

Workshop 2

- Presented completed double materiality workbook to the Executive Committee and members of Senior Management for final deliberations.
- Findings of the completed double materiality workbook determined the ESRS chapters that the business needs to prepare to disclose against.

Reporting

- Communicated the process and results of our first double materiality assessment in our Sustainability Report.
- Workbook used to focus reporting and will be used by the business to monitor management of all our material issues.

Next steps

- Engage external stakeholders for input on double materiality assessment.
- Prepare for compliance with CSRD in future sustainability reporting.

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Double materiality assessment

Results

We have a good understanding of the issues relevant to our business, having previously conducted a materiality assessment which involved input from internal and external stakeholders. The issues in the table are and will continue to be managed by the business and inform our ESG strategy and reporting.

The purpose of the double materiality exercise was to understand which of these issues had the most significant impact and financial materiality.

To do so, consideration was given to all the existing processes, policies and management systems we have in place. Those costs that are already accounted for within our business-as-usual outlook, and for which we foresee no related risks or opportunities arising across the short, medium or long term, are therefore not of significant financial materiality. Similarly, impacts the business has externally that are already well managed are not of significant impact materiality.

The table therefore demonstrates which underlying impacts, risks and opportunities are most material over the short, medium and long term.

Material issues across our focus areas
Customers
Safer gambling
Safeguarding minors and vulnerable customers
Product safety and quality
Ethical marketing
Customer service
Customer privacy and data security
Health and safety
Colleagues
Training and development
Equality, Diversity and Inclusion
Employee engagement and reward
Mental health and wellbeing
Environment
Emissions management and climate change adaptation
Environmental management
Communities
Community impact
Governance
Business ethics
Corporate governance
Executive remuneration
Financial performance
Regulatory compliance
Risk management
Supply chain management

Safer gambling remains a priority issue for the business when we consider the external potential impact of problem gambling for our customers. However, the robust and well-established controls and procedures we have in place for promoting responsible play, identifying at-risk play and intervening when appropriate mean that the impact materiality of this risk is very low.

Similarly, existing controls to prevent underage play, to ensure we ethically market our products and to protect the health and safety of customers mean that these issues are not significant in external impact or internal financial materiality.

We have robust customer privacy and data security measures in place. Nevertheless, the implications of a data breach and the risk of a cyber-attack are very significant, leading the potential financial impact to be rated highly for this issue.

Changes in customer behaviours could financially impact the business, but we also recognise that Rank's proposition to excite and to entertain our customers is the biggest opportunity internally and impact externally.

ESRS disclosure activation

The double materiality exercise also supported confirmation of the material ESRS disclosures on which the business plans to report, in addition to the mandatory disclosures. Given the materiality of customer related-matters, we have activated ESRS S4 Customers and end-users topics and, given the materiality of compliance, ESRS G1 Business conduct.

To ensure that we are best placed to comply with the CSRD requirements (not currently applicable to Rank), we have begun an assessment of our existing disclosure against these areas, activated by our assessment.



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Double materiality assessment

Key

Description of impact, risk or opportunity
A **Actual:** An impact, risk or opportunity that **has** occurred during the reporting period
P **Potential:** An impact, risk or opportunity that **has not** occurred during the reporting period
Impact or financial
I-O **Inside-out:** An impact to the environment or society
O-I **Outside-in:** A risk or opportunity for the business's finances
Materiality in the short term
An opportunity or a positive impact (Longer bar = more significance)
A risk or a negative impact (Longer bar = more significance)
Materiality trend
Stable: Materiality **stays the same** across the medium and/or long term
Decreasing: Materiality **decreases** across the medium and/or long term
Increasing: Materiality **increases** across the medium and/or long term

Issue	Potential or actual	Description of impact, risk or opportunity	Impact or financial	Materiality in the short term	Materiality trend
Customers				Low – High	
Customer privacy & data security	P	Loss of personal data could result in prosecutions, financial penalties and reputational damage.	O-I		↔
Customer privacy & data security	P	Cyber-attacks can disrupt and cause considerable financial and reputational damage to the Group.	O-I		↔
Customer Service	A	Deliver exciting and entertaining experiences to our customers.	I-O		↔
Customer service	A	High customer satisfaction results in higher NPS and positive reputational impact.	O-I		↔
Customer privacy & data security	P	Time taken to overcome serious incidents/disasters and resume normal operations can impact operations, customers and reputation.	O-I		↓
Safer gambling	P	Failure to adequately protect customers from gambling-related harm could lead to regulator enquiries and reputational damage.	O-I		↔
Customer service	A	Changes in customer behaviour after pandemic, further exacerbated by cost of living challenges, results in declining visits to Mecca venues.	O-I		↑
Colleagues				Low – High	
Training & development	P	Extensive training and development opportunities resulting in increased employee satisfaction and valued employment opportunities.	I-O		↔
Employee engagement, management & reward	P	Poor employee value proposition resulting in poor employee satisfaction.	I-O		↓
Employee engagement, management & reward	P	Failure to be an employer of choice could result in recruitment challenges and increased attrition.	O-I		↓
Employee engagement, management & reward	A	Non-compliance with labour laws resulting in reputational damage.	O-I		↔
Employee engagement, management & reward	P	Tight job market or lack of awareness of the Rank brand could result in recruitment challenges and increased attrition.	O-I		↔
Training and development	P	Employees being able to develop their skills and experience results in better trained employees and improved performance.	O-I		↔
Environment				Low – High	
Emissions management & climate change adaptation	P	Failure to meet internal or external stakeholder climate-related expectations could impact reputation and relations.	O-I		↓
Emissions management & climate change adaptation	A	The release of GHG emissions to the atmosphere as a result of Group's operations and across the entire value chain.	I-O		↓
Communities				Low – High	
Community impact	A	Creating positive outcomes for local communities through charitable initiatives and offering local employment opportunities.	I-O		↔
Governance				Low – High	
Regulatory compliance	P	Absence of regulatory/legislative change that fails to meet the needs of the consumers is risk to relevance of our proposition.	O-I		↑
Executive remuneration	A	Attractive renumeration package enables talent acquisition which drives business performance.	O-I		↔
Financial performance	A	Loss of banking debt facilities and/or clearing facilities could result in the Group being unable to meet its obligations as they become due.	O-I		↔
Financial performance	A	Continued cost and pricing pressures, together with changes to consumer behaviour, can impact trading performance.	O-I		↔
Regulatory compliance	P	Failing to comply with existing regulatory, legislative, codes of practice and licensing conditions could increase risk of financial penalties or regulatory action.	O-I		↔
Financial performance	P	Risk of higher tax and duty cost as a result of new legislation, complexity of tax and duty regimes, government approach, and compliance and implementation.	O-I		↑

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ESG strategy



Our ESG strategy is now well-established; it focuses on the four key areas of Customers, Colleagues, Environment and Communities, and is underpinned by robust governance policies and processes.

To monitor performance against our commitments in each area, we track eight key performance indicators ('KPIs'), four of which are linked to executive remuneration.

In setting targets against each KPI, we consulted with function heads across the business and we also continue to track a wide range of underlying metrics in each area.

Customers

Delivering an entertaining and exciting experience for all our customers, whilst ensuring that they play within their means.

KPIs

- Customer NPS
- Customer feedback score on safer gambling*
- Employee NPS on safer gambling*
- UK digital customers using safer gambling tools

Colleagues

Providing fulfilling employment opportunities by fostering an inclusive and supportive culture where colleagues feel engaged and are able to grow.

KPIs

- Employee NPS* and engagement
- Percentage of women in senior roles

Environment

Reducing our environmental impact through assessing consumption and decarbonising our operations supports our net zero ambitions.

KPIs

- Absolute carbon emissions*

Communities

Taking an active role in our communities through engaging with local people, volunteering our time and fundraising for causes important to our colleagues.

KPIs

- Total charitable funds raised

*Linked to executive remuneration.

ESG & Safer Gambling Committee Report

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Dear Shareholders,

I am pleased to provide a summary of the work undertaken by the ESG & Safer Gambling ('ESGSG') Committee over the past 12 months and present the evolution of our ESG strategy, progress against our objectives and details of our plan to reach net zero by 2050.

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

I was pleased with the good progress made during the year following the publication of our 2023 Sustainability Report in September 2023, alongside the 2023 Annual Report and Accounts. This provided the foundations to accelerate Rank's ESG strategy during 2023/24 and I am delighted to publish this 2024 Sustainability Report alongside our 2024 Annual Report and Accounts, and made available on Rank's website, www.rank.com.



Key activities

In 2022, the Committee determined that it would provide rigour, support and challenge to the business as it developed and implemented its new ESG strategy. During 2023/24, we continued to embed and strengthen our ESG focus into each of the business areas, drawing on the outcomes of the single materiality assessment (covering all ESG impacts to the organisation) carried out in 2022.

The business also began preparations for being compliant under the Corporate Sustainability Reporting Directive ('CSRD') of the European Union (given its operations in Spain and Malta) and this year has carried out double materiality assessment workshops (considering both the effects the Group has on the climate and the environment and the potential impacts of the same on its own financial performance).

It has been assisted by Buchanan Communications and EY in assessing, evidencing and reporting on such risks (leveraging the Group's corporate risk register) as it seeks to identify, prioritise and validate material issues that affect both risks and opportunities. The workshops will determine the CSRD disclosures applicable to the Group and will satisfy both EU regulations and impending UK legislation.

The Committee Chair liaises regularly with the Chair of the Remuneration Committee on related aspects, including equality, diversity and remuneration incentives for ESG, including safer gambling and compliance. All the members of the ESG-SG Committee are also members of the Remuneration Committee. Agendas from the ESG-SG Committee take into account work and oversight by other committees and vice versa to avoid any unnecessary overlap, and collectively the Board assesses the terms of reference of each Committee.

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ESG & Safer Gambling Committee Report

The Committee is also presented with updates with regards to communities at each Committee meeting, where community work is presented and reviewed. Updates include an active drive to recruit from local communities and supporting colleagues with the ability to give back in charitable means to their local communities.

During 2023/24, the Committee also began to report against 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 Score ('NPS')
Customer feedback scores on safer gambling
Employee NPS on safer gambling
UK digital customers using safer gambling tools.

2 Colleague experience

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

KPIs

Employee NPS
Percentage of women in senior leadership roles

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.

KPIs

Absolute carbon emissions

4 Community engagement

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

KPIs

Total charitable funds raised

Each focus area primary KPIs are shown above.

ESG initiatives

The Committee received business updates during the year to assess how the Group's ESG objectives aligned with the corporate and strategic objectives, see pages 15 to 18 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 initiatives in support of the corporate strategy, and that this will enable the business to be managed in a sustainable and responsible way. The Committee expects continued development in each of the business areas and 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 embedded 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. Please see pages 21 to 28 of the Annual Report.

> **"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."**
>
> **Katie McAlister**
> Chair of the ESG & Safer Gambling Committee

Customers, colleagues, environment and communities

During the year the business 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 provided a greater understanding of the Company's ability to track and evaluate progress and allowed Board-level oversight of performance against strategy, in line with global best practice.The KPIs continue to be reviewed and assessed for appropriateness and relevance. For more, see page 18 of the Annual Report: www.rank.com.

In terms of developments in diversity and leadership, more can be seen on page 76 of the Annual Report.

See page 75 and 92 of the Annual Report 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 52 of the Annual Report for more on this.

Net zero

The Committee oversaw executive management's carbon management work through the Net Zero Working Group ('NZWG') and the progress made to develop its reporting framework in line with the Task Force on Climate-related Financial Disclosures ('TCFD'). See pages 47 to 51 for more information.

The Committee considered the recommendations made to set the business on a net zero pathway, which set out a measured approach, and the establishment of an interim greenhouse gas emissions reduction target to be achieved by 2035, alongside the longer-term target of achieving net zero by 2050.

Electrification of gas supplies was analysed in 2024 and a budget for this has been built into the plan for net zero by 2050.

Also during the year, eleven net zero site audits were undertaken and venue-specific environmental recommendations are being considered for budget purposes and for actioning. The remaining audits of the other 87 sites will occur in 2024/25. As part of this, work is ongoing to assess the feasibility of installing solar panels on the sites.

To assist in the development of the net zero plan there is ongoing recruitment of an environmental manager. The plan for net zero for Spain was being progressed with finalisation of the decarbonisation plan for Scope 1 and 2 greenhouse gas emissions and completion of a Scope 3 baseline exercise.

LED lighting was progressed across the Grosvenor estate and was completed in May 2024.The analysis of energy use data was assisted by Cloud FM, our third-party facilities management partner. The new technology will greatly assist in identifying and clarifying further opportunities for improved management of energy consumption. A new waste and water management agreement with Biffa had been entered into which included a target saving of 50%.

Additionally, work is being undertaken on monitoring of heating and air conditioning use through certain tools being made available to managers of business units to reduce manual override. Training on the same is being provided to help manage this usage in order to transition to more economic and efficient energy management.

The Group missed its emission reduction target in the year due to higher-than-expected employee travel and an adverse move in emission factors.

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TCFD

The Committee has worked alongside the Audit Committee in determining the TCFD-aligned disclosures set out in this 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 and a core pillar of Rank's strategic objectives. The Committee has ensured the importance of safer gambling within Rank's wider ESG framework and we are comfortable that there is a strong focus on this area.

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 enhancing existing player protection measures, as the Group continues to evolve its user journeys and deliver targeted improvements for those players who need our support. 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.

The Committee received reports on the developments being made to strengthen a safer gambling culture throughout the Group and analysed the same. The work being undertaken is to ensure that the business continues to instil a consistent approach to the processes and behaviours our colleagues employ to achieve Rank's purpose and to deliver exciting and entertaining experiences within a safe environment. To best equip our colleagues with the skills and understanding to recognise players that are at risk of problem gambling, we have conducted extensive employee training. Every employee must complete mandatory safer gambling training on an annual basis, with progress and training completion rates monitored through our online training platform. Additional training is provided as required or according to a particular role's needs.

We have also engaged GamCare to provide bespoke safer gambling training on an ongoing basis to all customer-facing colleagues. In June, GamCare presented to the Board on progress to date and ongoing work to enhance the training being provided. This included Gamtest – GamCare's online self-assessment tool, developing awareness of indicators of potential harm and signposting and support to anyone affected by gambling-related harm. Support is provided through chatrooms, a helpline, a forum and various other resources which range from self-help tools to individual face-to-face meetings.

During the year, Grosvenor was assessed by GamCare against their Safer Gambling Standard. As a result, we are pleased to report that all our UK-facing businesses have achieved an Advanced Level 2 "Gold" safer gambling standard accreditation from GamCare, indicating that these businesses have adopted, or are in the process of adopting, a range of safer gambling measures that go beyond the social responsibility provisions of its gambling operating licence. It was also pleasing to see this year's successful regulatory compliance assessments, and management's positive response to these assessments with changes made in the year to policies and practices to better protect our customers.

The Committee noted that Grosvenor was changing its approach and thresholds for the customer relationship and for high level play. A risk app had been introduced to deliver a more efficient and intuitive process for risk management as this allowed for more informed and tailored interactions on the gambling floor. CRM technology is also being harnessed to improve the customer experience and to make the gambling experience safer. Investment is being made to improve front-end customer interactions, to tailor messaging and to provide data to customers on their own player performance (play of product, events and time spent). This will build the personalisation offering through customer data and help the business manage customer risks more effectively using real-time data on a CRM tool which provides improved KPI dashboards to measure key metrics and trends.

Additionally, Hawkeye technology, which identifies players that are potentially at risk of problem online gambling behaviour, is being implemented to help management identify possible at-risk individuals. This will allow for sensitive and empathetic early intervention and tailored conversations to help mitigate risk. The Board visited our Sheffield office to review the Hawkeye technology earlier this year.

For more information please see page 40 of the Annual Report.

The business is also raising the safer gambling profile and features with customers through marketing campaigns focusing on safer gambling and self-help measures allowing them to take control to better manage their own risk profile.

The business was focused on the Gambling Act review changes in respect to new slot staking limits, affordability measures and the frictionless customer journey and improving direct marketing preference controls. The Committee received several updates on the same throughout the year on how this would impact the business and customers and was able to assess and challenge the management response to the opportunity and risk it presented.



Mecca, Luton

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 proactively 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 2024, he kept the Committee informed of the consultation process as regulators consider the implementation of the legislative reforms (see the Chief Executive's summary for more information on page 13 of the Annual Report). The Committee will continue to consider stakeholder views and those of the industry and media during this next phase of consultation and any legislative developments.

Rank's contributions to the Government's review have also extended to shaping responses from the Casino Chapter within the Betting and Gaming Council ('BGC'), the BGC itself and 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.

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Research, Prevention and Treatment

Rank upheld its commitment to RPT contributions during the year, maintaining the rate of previous years. In accordance with Gambling Commission parameters, Rank funded the research team at the University of Liverpool, funded the YGAM educational programme for a fifth consecutive year, and made a direct payment towards GamCare for its ongoing work in treatment of gambling-related harm. Notwithstanding political change at the time of writing, the Committee is aware of the White Paper's planned policy reforms in terms of a statutory levy and will continue to monitor the impacts of any change in funding requirements.

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 greenhouse gas 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. More detail on this is set out in this report on pages 47 to 53.

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 54 to 61 of this report. The Committee has worked alongside the Audit Committee to ensure the integrity of the Committee's climate-related risk process, as well as reviewing the recognition, measurement, presentation and disclosure of climate-related 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. This year, Rank's evaluation exercise focused at Board Committee 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 was rated highly overall and that whilst work continues, the Committee was seen to be in a good position on safer gambling, which was said to be the Group's key risk. Training for the Committee occurred, which included a review of Hawkeye technology and engagement with GamCare, and the Committee was also updated on where the regulator was with regards to best practice and additional rules.

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

The Committee approved eight baseline KPIs across the four key priorities (as set out above) which underpin the strategy. Also approved were four KPIs for remuneration target measures – see the Remuneration Report for details on how this was implemented in the year on page 90 of the Annual Report.

Focus areas for 2023/24

There were no particular outcomes for the Committee evaluation and accordingly the Committee concluded the focus for the year should continue to keep management accountable for all areas of ESG and ensure Remuneration and Audit Committee KPIs aligned.

Progress made during 2023/24

The Committee continued to:

1. Maintain its focus on ESG reporting on the four focused areas of customer experience, colleague experience, environmental management and community engagement.
2. Evolve and measure management's delivery of ESG initiatives under the four KPIs.
3. Assess and monitor the development of the net zero plan.

Focus areas for 2024/25

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

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 alignment 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 will be happy to answer any questions on this report at the forthcoming Annual General Meeting.



Katie McAlister
Chair of the ESG & Safer Gambling Committee



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Governance framework

ESG management

We established four key areas of focus to support effective ESG management: Customers, Colleagues, Environment and Communities. This structure is underpinned by our understanding of the material ESG risks and opportunities to the business.

Our key performance indicators in each of the four areas support performance reporting. We believe that the long-term success of our business is dependent upon how we manage non-financial matters, and is therefore linked to executive remuneration, sharpening our focus on ESG-related performance.

We have a robust ESG management 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 apprised of any new or emerging ESG-related risks.

Our ESG Working Group ('ESG-WG'), with representatives from each area of the business, drives our ESG agenda and operationalises our strategy across the Group. The ESG-WG is led by our Director of IR, ESG and Treasury and reports into the ESG Steering Group ('ESG-SG') at Executive Committee level.

To provide purposeful direction on decarbonisation, our Net Zero Working Group ('NZ-WG'), supported by external consultants with environmental management expertise, is developing a strategy to reach net zero emissions in line with our targets.

Regulatory environment

We hold licences in all the markets we are required to, which are the UK, Spain (in Andalusia, Catalonia, and Madrid) and Gibraltar, and we are subject to the laws and regulations of each jurisdiction. The regulatory bodies in each location are the Gambling Commission in the UK, La Direccion General de Ordenacion del Juego ('DGOJ') in Spain and the Gibraltar Regulatory Authority.

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

As a minimum, we operate in line with the regulatory requirements set out by the local authority in each jurisdiction. In the UK, gambling legislation is advanced and far-reaching and, as such, the measures we have in place to promote safer gambling are well-established and recognised by customers and colleagues alike. Our Safer Gambling Policy in the UK sets out our approach to promoting responsible play.

The Compliance and Responsible Gambling Committee tracks the effectiveness of our approach to safer gambling internally, whilst GamCare provides external evaluation through the Safer Gambling Standard, an independent quality standard that assesses the measures gambling businesses have in place to protect people from gambling-related harm.

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

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

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

Number of personal management licence holders

539

Number of hours per employee who undertake AML training

1.0

Legislative change

Publication of the Government's White Paper into gambling reforms was made in April 2023 and the start of 2023/24 saw a number of Gambling Commission and DCMS-led consultations launched with the intention of exploring how best to apply the public policies contained in the White Paper. For Rank, the most material consultation of the year related to the, much-needed, land-based reforms for casinos and bingo. In May 2024, the Government published its response to the consultation, outlining how the various reforms would be delivered and the proposed secondary legislation to bring them into being. We welcomed the details of the Government's consultation response, noting that it signified another important step closer to the legislation which will enable Rank's Grosvenor and Mecca venues to better meet the needs of our customers.

The July 2024 general election inevitably delayed the proposed secondary legislation but, with a new Labour Government now in place and a new DCMS ministerial team appointed, we expect the passage of legislation to recommence in the coming months.

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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. The Bingo Association ('BA') is the trade group for all licensed bingo operators in Great Britain. In Spain, we are members of Jdigital, the country's online gambling trade association, as well as land-based bingo associations in the three regions where we operate: ASOBING (Andalusia), AEJEA (Catalonia) and ASEJU (Madrid).

Rank makes financial contributions in support of research, education and treatment of problem gambling. In 2023/24 (covering the period of April 2023 to March 2024), Rank pledged a total of £628,580, of which £428,580 went to GamCare, £100,000 to Education YGam and £100,000 to the University of Liverpool. We have also worked with the organisations GamCare and Gordon Moody, to provide safer gambling training to colleagues and improve understanding of problem gambling respectively.

During 2023/24, all UK-facing businesses have achieved an Advanced Level 2 "Gold" safer gambling standard accreditation from GamCare, evidencing a high standard of player protection in our UK online and land-based activities.

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

Percentage of UK trade association meetings attended

100%

Total financial contributions in support of research, education, and treatment of problem gambling

£628,580*

*Covering the period of April 2023 to March 2024.

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, Disciplinary Procedure, Grievance Procedure, Whistleblowing ('Speaking Up') and Health and Safety.

Our whistleblowing programme, Speaking Up, enables colleagues across all our locations 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 an internal investigation, if required. A bespoke approach is taken in each investigation of an incident or issue raised, with subject matter experts brought in as required.

Reports received are kept strictly confidential and the concerns identified are 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 colleagues 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 Group-wide colleague engagement platform, Connect.

We have introduced annual awareness training on Speaking Up to make sure colleagues know how to raise any issues.

We also encourage our colleagues to raise 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.

Total number of whistleblowing incidents reported and investigated

13



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Supply chain management

Operating in a highly regulated industry and managing a varied supply chain over multiple jurisdictions requires an experienced and effective procurement function. Our team of category managers each focus on different areas of the Group's value chain, from digital gaming to food and beverage.

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

This year we developed a new Supplier Code of Conduct, launched in August 2024, which outlines the principles and expectations for all suppliers conducting business with Rank.

Suppliers must comply with all applicable laws, regulations and standards in the countries where they operate, conduct all business activities with integrity and avoid any form of corruption, bribery, or fraudulent practices.

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

Suppliers must comply with all internationally recognised human rights which, at a minimum, are understood as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principle and Rights at Work from time to time in force in any part of its supply chain.

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

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

Suppliers are expected to have systems in place to monitor and demonstrate their compliance with this Code. They should be open to audits or inspections by Rank or an appointed third party. We conduct spot checks for key suppliers. We have a contract management system that supports us through a contract's lifecycle, and we review contracts at different points dependent on the tier level of each supplier.

Our standard payment terms are 30 days, though this varies depending upon the type of product (for example, taxi services versus provision of utilities). This year we appointed SafeSupplier, a supplier verification platform, to help us get greater visibility on all of our supplier contacts.

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

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

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

Reflecting our own sustainability commitments, we want to work with third parties that demonstrate environmental responsibility. Our new Supplier Code of Conduct includes a requirement for suppliers to minimise their environmental impact by adopting sustainable practices. This includes promoting waste reduction, and responsible use of energy and water. Suppliers must comply with environmental laws and regulations and strive for continuous improvement in their environmental performance with appropriate policies and systems in place.

Furthermore, under the requirements of Scope 3 emissions reporting, Rank will be obligated to report on emissions not only produced by the business and the activities owned or controlled by us, but also those that are produced indirectly by our suppliers. We have included the expectation for suppliers to share environmental performance with Rank within our Supplier Code of Conduct.

We encourage collaboration and engagement between ourselves and our suppliers to foster a responsible and sustainable supply chain.



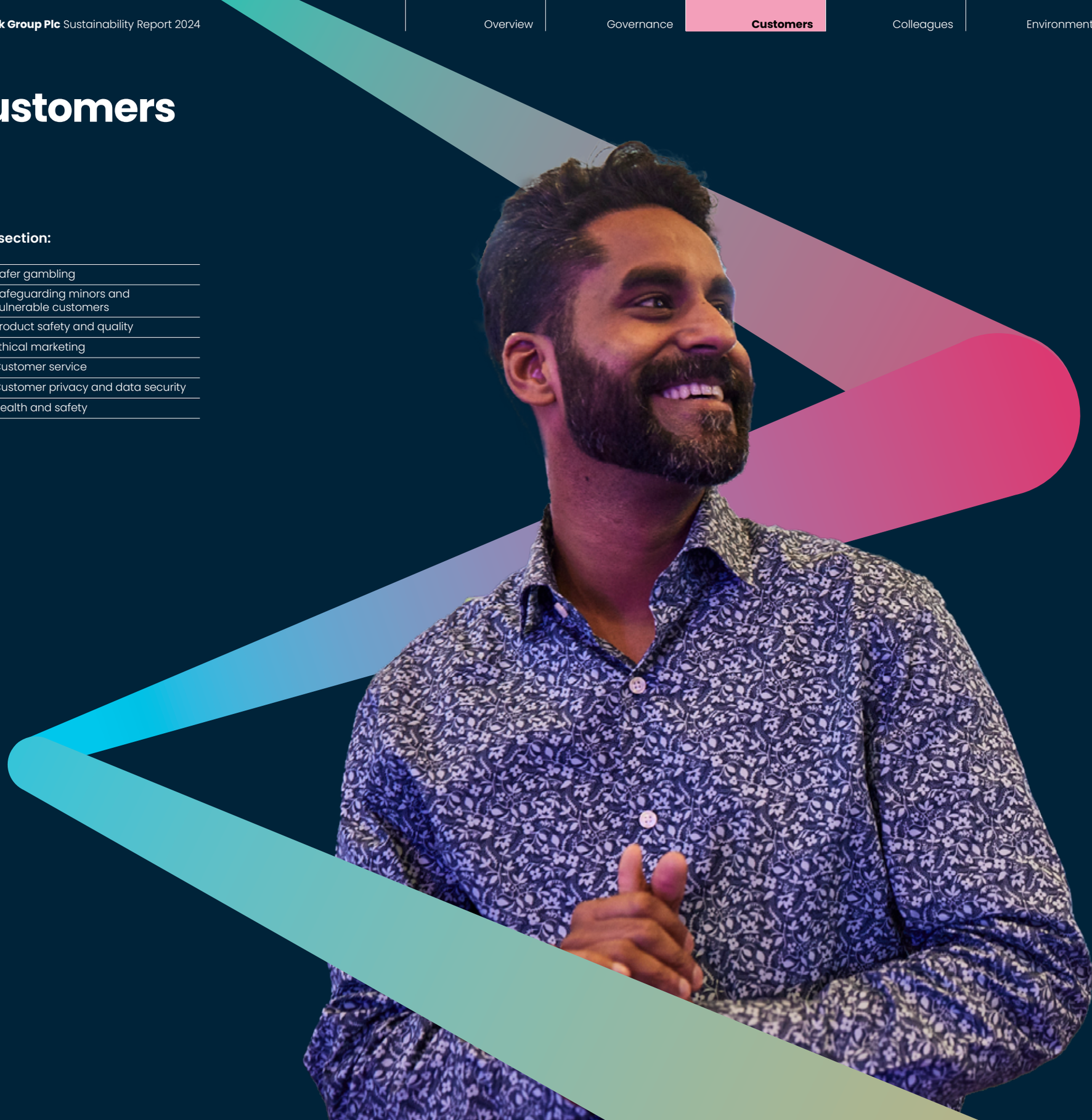
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Customer Net Promoter Score ('NPS')*

↑ **52**

Employee NPS on safer gambling

↑ **69**

Customer feedback scores on safer gambling*

↑ **84%**

UK digital customers using safer gambling tools**

↑ **31%**

Created a player protection function, bringing together our safer gambling and customer due diligence teams, to improve the support we provide to our customers.

Utilised new technology to increase the capacity of our customer service teams and our ability to respond to customers.

Continued to ensure strong awareness for safer gambling through customer communications and employee training.

* An average for last three months of the year and this Group score is a weighted average of all business units scored based on NGR % contributions.

** This is the total active customers that have used safer gambling tools during the year.



To ensure there is oversight of all aspects of the customer experience, we have established clear accountabilities throughout the organisation and 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 Responsible Gambling and Compliance to ensure adherence to the laws and regulations that govern their relevant jurisdictions.

The ESG & Safer Gambling Committee meets every quarter to receive updates, from the Managing Directors and the Director of Responsible Gambling and Compliance, on all matters pertaining to player protection, and any findings are then reported to the Board.

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 and Chief Financial Officer.

Our Chief Executive has ultimate responsibility for the business's interaction with customers, including engagement, ethical marketing and the direction of the Group's safer gambling approach.

Safer gambling

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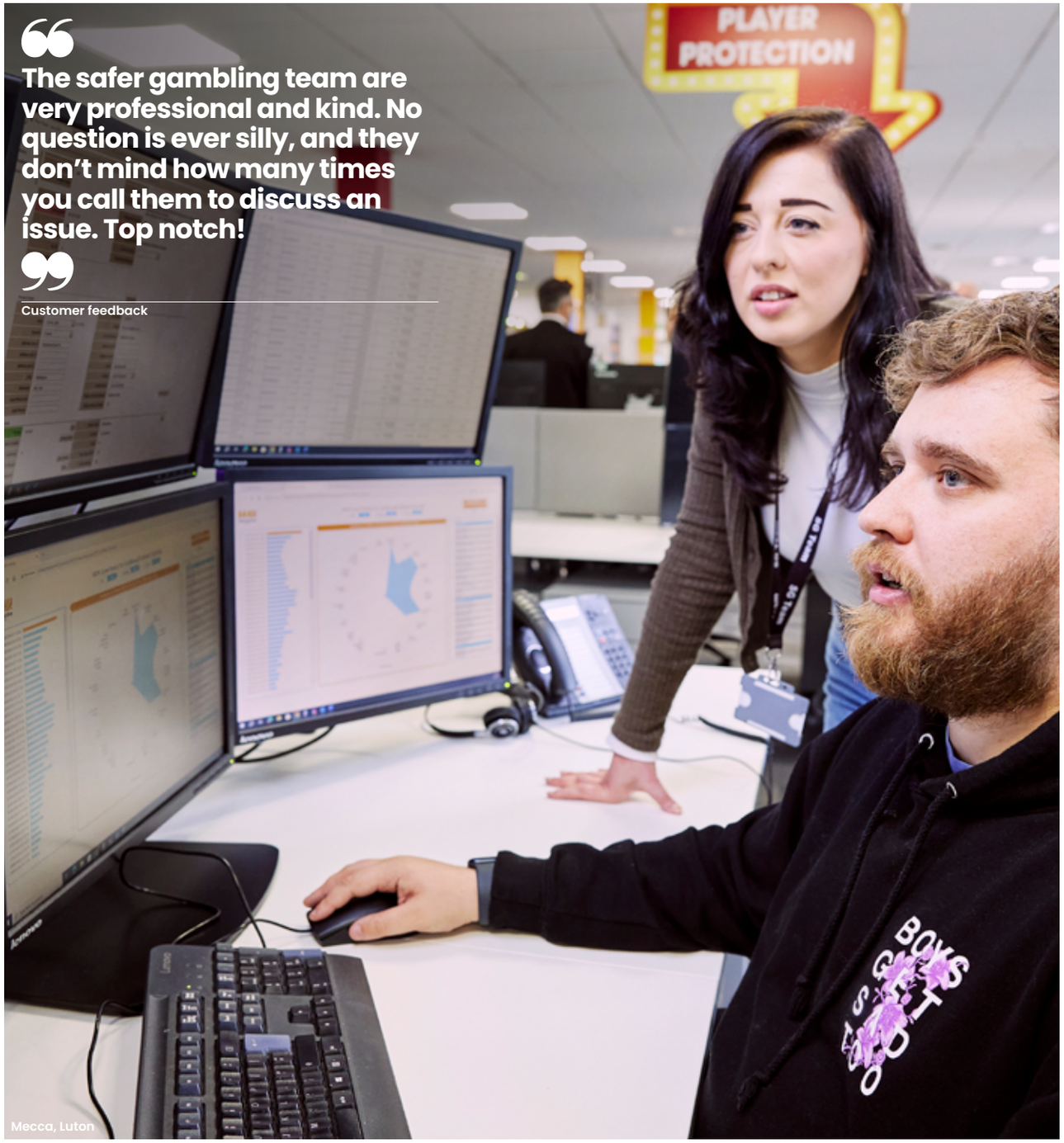
Safer gambling is at the heart of everything we do at Rank; we cannot deliver exciting and entertaining experiences without creating a safe environment for our customers.

Foremost, it is important that we promote awareness for safer gambling amongst our customers and colleagues, featuring messaging in every venue, across every platform and in all communications. Secondly, we provide customers with safer gambling tools that they can use to control and have more awareness of their play. Despite equipping our customers with the knowledge and measures to have a safe experience, a small proportion of individuals will demonstrate at-risk behaviour. It is therefore critical that we are constantly monitoring for at-risk play.

We are constantly evolving our safer gambling processes, from utilising new technology, to upskilling our colleagues, to ensure continuous improvement. In the UK, we have brought together our safer gambling and customer due diligence teams and processes into one player protection function, in order to increase knowledge and improve support to our customers. Through significant investment in training throughout the year, we have now created a robust operational framework designed to safeguard both our customers and the business.

To maintain a seamless experience for customers whilst promoting safer gambling, we have taken a number of steps. We have evolved our customer risk models to mitigate friction in the customer journey and we are employing more player protection processes in the background.

We are enhancing our ability to effectively address both money laundering and safer gambling concerns with minimal interruption to the customer's experience.



Safer gambling

We are developing a new AML model which will be incorporated into our proprietary real-time monitoring platform Hawkeye, offering more advanced monitoring in one overarching system for digital play. Together with the anticipated player protection measures as a result of the Gambling Act Review, we will be improving the visibility of our tools and controls.

Safer gambling messaging

A fundamental part of our safer gambling strategy is awareness. As such, safer gambling messaging is incorporated into all communications across the Group and is present in every venue. The objective is both to maintain strong awareness amongst customers and to keep safer gambling central in the minds of our employees.

This approach reminds players to gamble responsibly and ensures that the relevant support is signposted and easily accessible, whilst not impeding on a seamless customer experience.

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 and, following its introduction last year, we also comply with the Code for the visibility of safer gambling in UK land-based venues.

Safer gambling messaging is present throughout the customer journey, at multiple different touchpoints:

- Whether registering to play online or in venue, every new customer receives a safer gambling message that includes information about the tools available to all players.
- Easily accessible safer gambling information, including links on every page of our websites to our dedicated safer gambling websites and safer gambling leaflets at various locations in our venues.
- Our standalone, dedicated safer gambling website in the UK, Keep It Fun, is a hub for advice and information on safer gambling tools available. Keep It Fun messaging appears on all our communications as standard.
- Targeted interactions driven by the proprietary Hawkeye model, with tailored emails sent to UK digital customers advising of Safer Gambling tools and resources.
- Annual enhanced Safer Gambling CRM activity, to support the annual Safer Gambling Week initiative.
- We have '360' safer gambling messaging in all UK land-based venues, including printed resources available for customers to read or take home, and digital touchpoints in our newly refurbished venues.
- There are safer gambling notifications on all machines across the Mecca and Grosvenor estate and there is appropriate signage in the gaming machine areas.
- Safer gambling materials are available in the back offices for colleagues as well.

In our Spanish venues, safer gambling messaging can be found on all gaming machines, on posters in every toilet and on leaflets available at reception, providing information on where players can seek help. There are resources and links to gambling charities on the dedicated safer gambling page of the Enracha website. We ensure that leaflets and posters are displayed and available in colleague areas of the venues, to remind colleagues of our commitment to safer gambling and provide easy access to materials and information.

For Rank's 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, and all customers that create an account with us will receive a specific communication on safer gambling.

Our customers' assessment of our approach to safer gambling is tracked across our UK digital and land-based brands. This year, we have seen an increase in our customer feedback scores on safer gambling, as well as the employee NPS on safer gambling, demonstrating the Group has an effective and recognised safer gambling approach.

> **"Nora was so helpful and her commitment in handling my enquiry was outstanding. She made me feel very safe to accept such wonderful support."**
>
> Customer feedback


Mecca, Luton

Safer gambling tools

Our safer gambling tools are designed to support customers, should they require it, in controlling their play and are signposted clearly online and in venues.

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

There are a range of tools which customers can employ to control their play:

- **Deposit limits** can be set up by customers to manage the amount of money that they can deposit into their account, while loss limits can also be used to manage spending.
- **Time limits** remind customers of how long they have been playing for.
- We provide links to GamCare's **self-assessment** tool from our UK dedicated safer gambling website. Customers can use this online assessment tool to find out how much of an impact gambling is having in their life.
- **Take a Break**, where customers can choose to block their online account for a period of up to six weeks.
- **Self-exclusion** allows customers to take an enforced break from gambling, and can be done through our own self-exclusion schemes or national schemes.
- The process of returning to gamble following a self-exclusion is arduous by design.

Use of these tools is an important measure of safer gambling cognition amongst our customers.

The rate of use amongst our UK digital customers is a key performance indicator ('KPI') and this year 31% percent of customers employed safer gambling tools.

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Safer gambling

Deposit/loss limits

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

For Rank's Spanish digital customers, with the exception of sports betting, default deposit limits are set on all games; customers can immediately set that limit at a lower level if they prefer, whilst to increase the limit they must apply to the business to do so.

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

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

Time limits

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

> **Grosvenor is a good, safe online gambling site, and the customer service is excellent.**
>
> Customer feedback

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

Self-assessment

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

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

Self-exclusion (Rank process)

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

The process of returning to gamble following a self-exclusion is also arduous by design. In the UK, a customer will have to apply in writing or in person requesting that they are reinstated. For venues, the local venue management will interview the customer and assess whether they recommend reinstatement.

Rank operates an independent safer gambling team which assesses each reinstatement request and takes a holistic view of the customer's lifetime history with Rank. They also, in the case of customers who use our venues, take into account the views of local management. Only then do they determine whether reinstatement is the appropriate decision for both the customer and Rank.

In Spain, our operator self-exclusion scheme allows customers to exclude from playing for up to six months. If a customer wants to then rejoin playing with us after an exclusion of between three to six months, they must go through a process with our safer gambling team. In line with new government regulation, if a customer wants to lift their self-exclusion, they will have completed at least one month of self-exclusion before their request is considered.

Self-exclusion (national schemes)

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

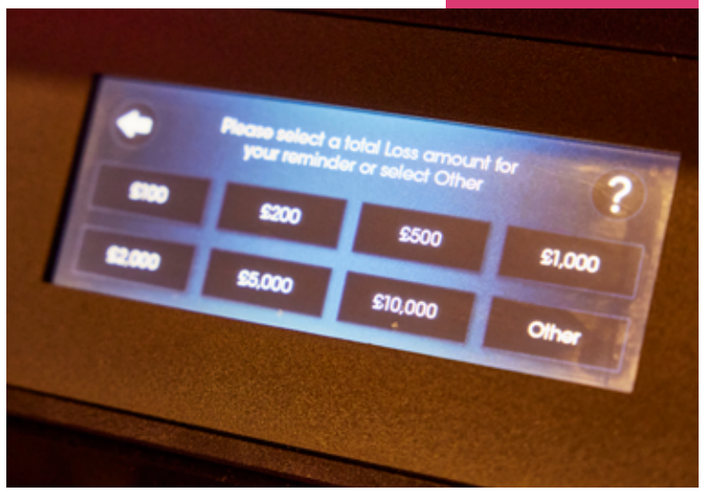
Where a customer has removed themselves from SENSE, we have a robust reinstatement process designed to protect them. Rank's independent safer gambling team is notified and performs a holistic review of the customer's lifetime history with Rank; approval is required from the Grosvenor operational team; local venue management hold a mandatory safer gambling and affordability conversation with the customer and only permit the customer to enter if they are satisfied that they are in control of their gambling;

and for reinstated customers with more than one previous self-exclusion, their play post-reinstatement is monitored for the next 90 days.

For Mecca, a customer is required to apply in writing or in person requesting that they are reinstated, subject to the customer not or no longer being registered on BISES. The process of reinstatement includes an interview from local venue management and a holistic review by Rank's independent safer gambling team of the customer's lifetime history with Rank. Furthermore, the Mecca operational team must approve reinstatement if the customer's history includes more than two previous self-exclusion periods.

In Spain, customers can self-exclude from playing, 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. Once a customer has self-excluded, they cannot enter our venues, are removed from the customer database, and will not receive any communications from Enracha.

> **Great fun, lots of choice, safe gambling options, and great customer service. Thank you Mecca.**
>
> Customer feedback



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Detecting at-risk customers

The majority of customers are able to enjoy exciting and entertaining experiences online and in our venues. The steps we take in educating our customers about safer gambling and providing them with the tools to play responsibly further minimise the risk of gambling-related harm. Nevertheless, there is a very small proportion of customers who will exhibit at-risk 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.

We have established clear methods by which to identify incidences of at-risk play and determine how best to intervene, whilst making sure that all other customers experience frictionless play. The approach that we take varies by business unit and by jurisdiction.

- **Employee training on safer gambling** ensures our colleagues are well-equipped to recognise and support at-risk players.
- **Data modelling** utilises information about customers to allow identification of individuals who may be at risk of problem gambling.
- **Markers of Harm model** evaluates demographic, transactional and behavioural data and known markers of harm, and the risk score generated for a customer determines the type of interaction they need to receive.
- **Affordability assessments** utilise credit profiles to assess whether the level of play of a customer is likely to be beyond their means.
- **Risk matrix** supports our teams in the Grosvenor venues to identify when an interaction is required, based on affordability and behavioural data.
- Our **Hawkeye system** monitors digital play in real-time 24/7 and is overlaid by the Markers of Harm model.
- Our **casino management system**, NEON, tracks customers entering Grosvenor venues and alerts the team if an individual who is due for a safer gambling interaction enters the premises.
- We completed the rollout of **Playsafe**, a machine management system for our Category B3 machines in our Mecca venues, and we can also track customer spend through the Max electronic bingo tablets.
- The **Central Engagement Platform** draws on information from all the UK digital and land-based brands, creating a single, centralised source of data

Data models

Markers of Harm model (UK digital)

The Markers of Harm model enables us to identify those customers for whom an early intervention may be appropriate, and to approach intervention in a more tailored and personalised way. The model is run continuously on all customers and it uses demographic, transactional and behavioural data and known markers of harm to assess customers.

The score a customer receives based on this data evaluation indicates the level of risk attributed to that individual. This determines the type of interaction they will need to receive. This can range from an email with safer gambling information, a direct call or blocking the account altogether.

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

Affordability assessments (UK digital)

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

In addition, we employ an affordability model in our UK digital business, which assesses customers based upon their level of play relative to their likely level of discretionary expenditure. Income is estimated based on national distribution of income by age band, and at a postcode level.

We are proactive in applying limits to customer accounts if we have a reason to suspect that a customer may be playing to a level that is more than they can afford or if they are in an age demographic that is considered to be at more risk of financial harm, such as under-25s. 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 customer spend in relation to their income (known or estimated), their number of visits and corresponding expenditure, their patterns of play, and how much they have spent in the last 90 days versus the 90 days prior.

A report from the model is published daily to each venue. Trained, in-venue colleagues have the ability to observe customer behaviour first-hand and draw on their own knowledge of customers from face-to-face interactions and day-to-day provision of customer services.

They use their insight and personal knowledge of customers, together with the data provided by the risk model report in Grosvenor, in order to determine if any further interaction is required.

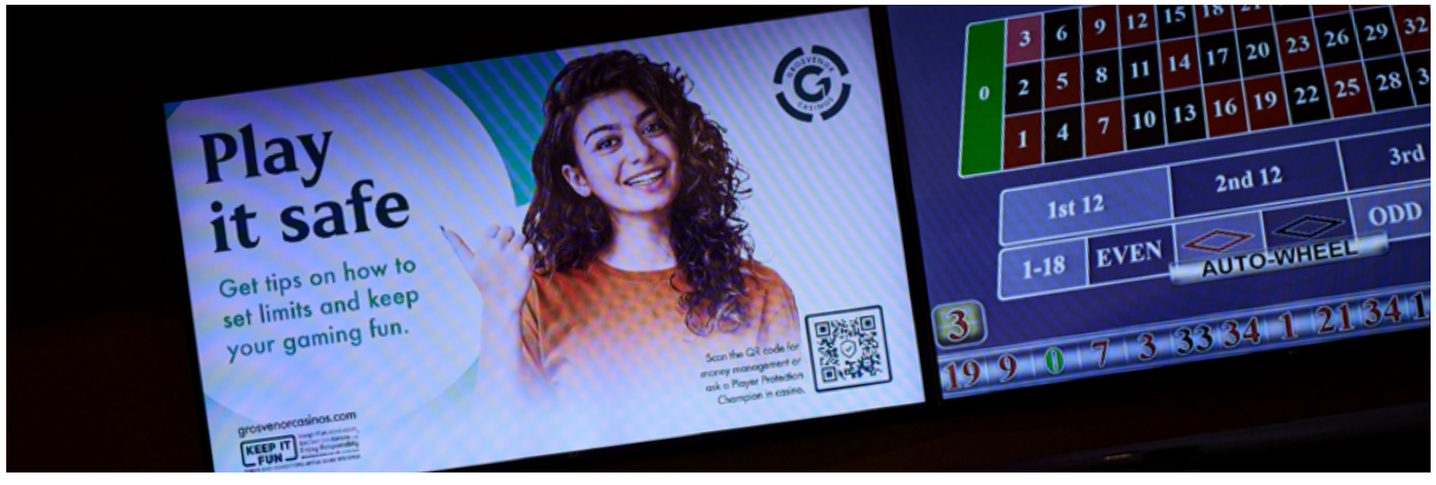
Risk algorithm (Spanish digital)

In Spain, for our digital businesses, the requirements for safer gambling tools are regulator led and dictated, with each new online account having a default deposit limit and a clear application process if a customer wishes to increase it.

If a customer applies for an increase in deposit limit, but their trajectory of spend suggests they would be at risk, they are denied the increase and assigned a 'cool-off period' before they can reapply.

In Spain, risk is determined against an operator's internal criteria; our risk algorithm is based on suspicion and evidence of risk and there are several factors that will inform a customer's score.

This includes variables such as self-exclusion, time passed since national ban, and deposit velocity. Our Safer Gambling Protocol includes our risk algorithm and we have a safer gambling platform and reporting mechanisms within our Spanish digital business.



Safer gambling

Monitoring play

Digital play monitoring

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.

Our Markers of Harm model has an overlay for the system which 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.

To enhance customer protection, Rank's UK digital business will be joining the pilot scheme GamProtect, facilitated by the Betting and Gaming Council. The industry faces the challenge of digital customers setting aside the safer gambling controls in place at one operator by simply creating an account with a different operator.

GamProtect tackles this issue as a mechanism through which participating operators can securely and compliantly share information on customers that play online who have been identified as needing support and protection.

Participating operators will identify a player as at risk of health-related problem gambling if the player states any of the following: they have a gambling problem or addiction, are seeking external support or treatment for gambling problems, will harm themselves or someone else, should not be gambling because they have a medical condition, or want to stop gambling forever due to problems with their gambling.

> **To continue in its mission as a responsible operator, Rank will be joining other members of the BGC by joining the initial stage of the GamProtect initiative, to offer protection across remote gambling operators for customers who are identified as displaying traits of heightened risk of gambling harm.**
>
> **Anthony Cornish**
> Head of Interactive Compliance at Rank UK Digital



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Case study
Hawkeye

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

As our approach to monitoring digital play continues to develop, we can increase the sophistication of the system in step with this, adding additional layers and adjusting the algorithms as required.

Our Markers of Harm model is an overlay in the Hawkeye system. The model scores customers based on demographic, transactional and behavioural data. If a customer's score exceeds the pre-determined threshold, this is a trigger for a safer gambling interaction.

Our Hawkeye 'Pilots' sit within the player protection team, monitoring the system and manually identifying when any customer exceeds the score threshold, while the system also automatically creates a case file in the Customer Relationship Management ('CRM') system. This helps to make sure that all customers exhibiting at-risk behaviours are identified and contacted.

The Markers of Harm score considers a range of behavioural factors including (but not limited to): session time, which is the total time a customer has played a game (rather than simply time logged in); payment methods used; and failed deposits, which can indicate when a customer has insufficient funds to make a deposit.

By tracking these behaviours, we not only identify when a customer's play at a particular point in time is concerning, but we are also able to build a picture of a customer's behaviour over time and track trends in their play. Therefore, if a customer were to repeatedly exceed the Markers of Harm trigger score, additional action would be taken to help protect that customer from harm.

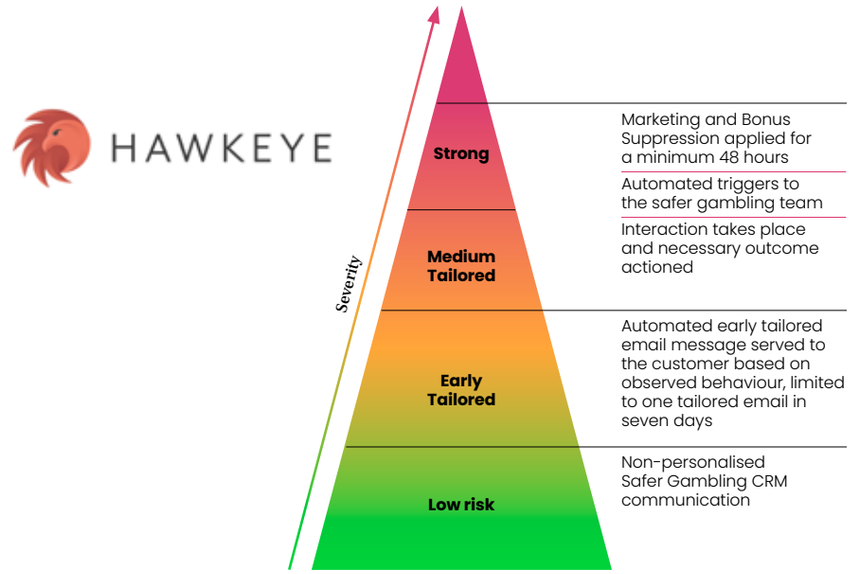
We recognise that customers demonstrating behaviours that do not exceed the threshold on Hawkeye for an interaction but fall in the range directly below that threshold could still be at risk.

In these cases, we send an early tailored interaction email, which explains the specific behaviour they demonstrated online and offers help and advice on how to manage their gambling.

The Hawkeye Pilots also monitor play for potential fraudulent behaviour. Having received enhanced due diligence ('EDD') training, which includes anti-money laundering ('AML') awareness, the team can recognise certain triggers which warrant investigation.

For example, by tracking payment methods customers use, we can determine if a top up card is being used rather than a bank card, which may indicate money laundering.

We are continuing to develop and refine the Hawkeye system in order to most effectively monitor digital play of our UK customers, categorise and recognise concerning behaviours, and ultimately help protect customers that may be at risk of problem gambling.





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Monitoring play

Venue play monitoring

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

The Risk App provides greater connectivity between the assessments of the risk matrix and the behaviour of customers in venue. We have released a recent update to our proprietary Risk App providing real-time colleague notifications of customers entering a venue, identifying these individuals and providing them with the support they require.

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

In the Mecca venues, we can track customer spend on the Max electronic bingo tablets. This year, we completed the rollout of Playsafe, a machine management system which enables Category B3 machine play to be monitored in real time.

Central engagement platform

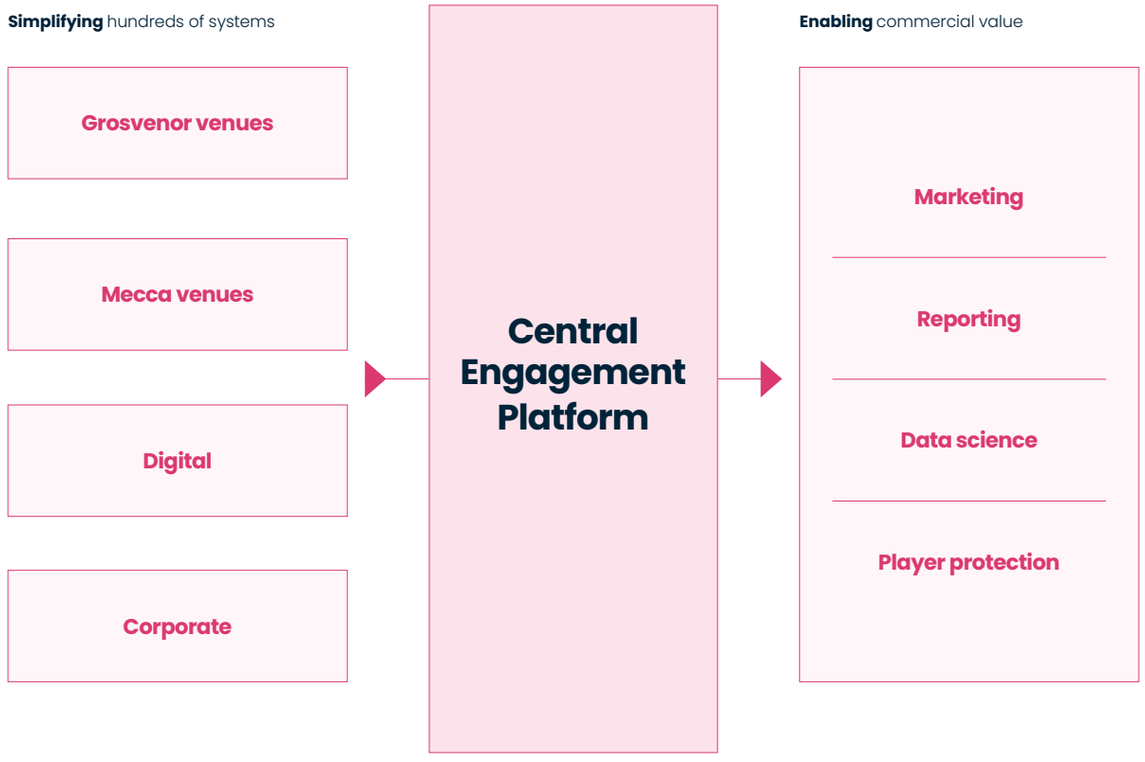
We recognise that data is fundamental to our success, as it is integral to our ability to report on our business performance, enhance our understanding of our customers, and deliver exceptional customer service. The Central Engagement Platform ('CEP') is Rank's proprietary data platform. Drawing on our numerous digital and venues systems, CEP amasses our data into a single trusted source of the truth, delivering quality information to the right people and places at the right time to be used with confidence.

CEP utilises industry-leading cloud technology with best-in-class security and an innovative approach to data management that not only improves the quality of our data, but has enabled us to optimise our cloud data storage costs while keeping our sensitive data safe. This is coupled with a focus on data governance that ensures our data is understood, defined and controlled in conjunction with our Compliance and Data Protection Officer functions. The platform delivers value to the business through supporting our business reporting and customer analytics, data science and artificial intelligence activities, covering our casino and bingo venues as well as our online gaming propositions.

CEP has enabled us to create a single view of our customers. This provides a richer understanding of a customer's engagement with our brands across our channels, which is fundamental in ensuring we correctly communicate to customers with the right marketing and service messages at the right time with accurate information. Critically, this supports our safer gambling objectives, as we are more accurately able to predict and identify at-risk customers through triggers and statistical models.

We continue to build the capabilities of the CEP by improving our data quality, enhancing performance as we decommission old systems and transfer their functions to CEP, and increasing the amount of process automation and efficiencies. This is enabling us to become a more proactive, dynamic and responsive business.

Creating a single source of truth



Safer gambling

Employee interactions

The effectiveness of our safer gambling approach is supported by nurturing a company culture of conscientiousness and caring for our customers. Safer gambling interactions, though informed by data and monitoring, are initiated by our colleagues using their insights and personal knowledge of customers. Fostering awareness and providing employees with the requisite knowledge of safer gambling is therefore critically important.

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.

The impact of employee interactions with customers relating to safer gambling is referred to in customer reviews. If a customer triggers the need for a review (across Mecca, Grosvenor, or UK digital), we will consider prior interactions, including when the interaction took place and any changes in play/behaviours by the customer following the interaction.

First line operational teams will conduct quality assurance checks on customer interactions. From a second line monitoring perspective, the compliance team conduct customer file sampling exercises each month and a part of this sampling work is to consider the impact of interactions identified during these reviews.

For our venues' employees in Spain, although there is no mandatory requirement around customer interventions, we have developed a new protocol on how to support customers that may be demonstrating at-risk behaviours.

For our digital brands in Spain, we also have risk detection measures in place. When at-risk behaviours are identified, the safer gambling team will send a message directly to the customer. The customer will be informed about why they have been contacted and how they can minimise the risk in their play. We will also then suppress commercial communications to the customer and send periodic messages with activity summaries for every month they are still exhibiting at-risk play.

We measure colleague sentiment on the Group's approach to safer gambling twice a year and eNPS score is one of the four ESG key performance indicators ('KPIs') linked to executive remuneration. Our latest eNPS on safer gambling was 69, an increase on last year's score.



Employee training

Training ensures that our colleagues are equipped with the skills and understanding to recognise at-risk behaviours. Every employee in the UK 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.

In partnership with the charity GamCare, we deliver two tiers of customised training for employees from across Mecca, Grosvenor and the UK digital business. The Gold Level training is a one-day intermediate level course, focused on spotting markers of harm and initiating first interactions, valuable for frontline customer-facing team members, such as bingo chat hosts, duty managers and cashiers.

The Platinum Level is delivered to colleagues responsible for escalated safer gambling conversations, including Grosvenor venues' colleagues, members of the High Value Customer team, and Mecca General Managers.

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.

In the previous year, we had a significant push on the GamCare training, and this year we have continued to conduct this for new employees and employees that have been newly-promoted to managerial roles, with 110 colleagues across Mecca and Grosvenor receiving the training.

Building on the successful implementation of our new ways of working training to over 3,000 Grosvenor colleagues in Spring 2023, we have continued embedding a strong safer gambling culture in our venues business.

In October 2023, Grosvenor launched a series of face-to-face training sessions for our Operations and Casino Managers to enable our leaders to deliver a safe and trusted environment for our customers.

The Board also went through a GamCare problem gambling awareness training during the year. In June 2024 members of the Board visited the Sheffield office to see the operation of the digital play monitoring system, Hawkeye, in person and to learn about how it detects at-risk behaviours.

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

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

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

100%

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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. 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 gambling

Under-18s are forbidden from entering our venues and from playing on our online platforms and we take action if there are unlawful attempts to enter our venues. We employ a number of methods in our venues to prevent underage individuals gaining admission:

Grosvenor

Registration policy, IDScan technology, CCTV and presence of supervisors limit the risk of under-18s entering the premises.

Mecca

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

Enracha

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

UK digital

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

Spanish digital

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

In compliance with advertising codes, a constant consideration in our marketing is to ensure that communications or advertising are not pitched in a way that would appeal to children. Due diligence for the opening of a new venue includes local area risk assessments. This ensures appropriate decision-making and effective risk mitigation for locations that might be close to schools or youth facilities.

In the UK, our casino and bingo venues participate in collective mystery shopper programmes organised by the respective trade associations. This provides both the Group and the industry reasonable assurance that we have effective policies and procedures to prevent underage gambling.

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.

Protecting vulnerable customers

There are a number of factors which can result in customers being vulnerable, including, but not limited to, life events, changes to financial situation, struggling with addiction and medical issues.
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.

There are a number of measures taken to safeguard vulnerable customers in the UK:

Age considerations

We set the bar higher in our marketing by not targeting promotional messages nor the products themselves towards anyone under the age of 25. We factor in the age of our customers as part of our affordability model and apply automatic deposit limits for all customers who are under 25.

Local area risk assessments

Prior to the opening of a new venue, we consider proximity to addiction treatment centres.

Marker of Harm model

Using demographic, transactional and behavioural data and known markers of harm to assess customers, any individual that scores in the high-risk category will not receive any marketing from any of our brands.

Colleague awareness

All colleagues are required to understand their responsibilities relating to the protection of vulnerable customers as they are well placed to recognise changes in customers' circumstances when conducting interactions.

Training

Colleagues in venues receive training relating to the protection of vulnerable customers and on how to recognise and respond to indicators of concern.

Referrals

We take proportionate and appropriate action if a vulnerable customer is identified, including discussing with customers the indicator that suggests vulnerability, signposting and customer referrals via a 'warm' transfer to GamCare for additional support resources, removing from marketing lists and taking action to limit or restrict access to their account. The Threat to Life process ensures that if the customer may be at immediate risk of harm, colleagues are trained to contact the police to request a welfare check.

Monitoring

Any potential or known vulnerabilities are recorded on a customer's account and taken into consideration when assessing their play. We operate a system that captures contact details for the individual in case of an emergency.

The efficacy of our methods for identifying vulnerabilities is in part dependent on the information we are provided by customers. If our data is high quality and up to date, we are better able to make sure customers are not circumventing controls such as self-exclusion. We therefore remind our customers that they must notify us if they have a change in details, including in our correspondence when an individual self-excludes and in our terms and conditions.

In our Spanish venues and digital business, any person registered on the national Regulators' Registry of 'persons prohibited entry in gambling establishments' will be identified and denied entry. The data from the Registry is downloaded daily to ensure we are able to fulfil this requirement.

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

When a customer spends over a certain threshold, we will request information to confirm whether their level of spending is affordable. This can include asking for their occupation, requesting to see bills, salary, or annual tax return, and enhanced due diligence requirements to establish proof of origin of funds. If we detected an incidence of severe risk, this would be escalated to our Legal Director immediately to determine the correct course of action and the appropriate authority to report into.



Product safety and quality

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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.

All providers of content must be B2B certified by the Gambling Commission and each individual game is certified and tested independently by the supplier. We are also responsible for engaging third party inspection/testing annually of our Grosvenor Casino live and direct products, which are venues' games livestreamed to our digital channels.

The gaming machines that we use are required to comply with specific Gambling 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.

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 beverage.

In Spain, our Compliance Manager conducts audits of the venues every three months, to ensure that the licences on gaming machines are valid. Each autonomous community has its own regulatory requirements for machines, which include rules around display of information, average game duration and value of prizes. All gambling products installed in our Spanish venues are certified in accordance with regional regulation, and each machine must have its individual homologation paper and fulfil the legal Return to Player ('RTP') rate. For our Spanish digital business, any new games must be approved and homologated by the DGOJ. We conduct a monthly internal check of the RTP rate, specifically evaluating any significant variation in the 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

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 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, it 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.

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 gaming machine reports which can flag issues such as terminals not connecting, unusual margins or promotional spend abuse.

Our operations teams have a daily checklist that is targeted to report or remove product issues at the start of each session or day.

For table games in our Grosvenor venues:

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

For the roulette wheels in our Grosvenor venues:

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

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 choose 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, gaming 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 DGOJ.



Ethical marketing

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Compliance of advertising

Balancing the dual objectives of effective marketing and responsible advertising is a critical task for our marketing team.

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

To ensure that all promotional materials that we develop are compliant we employ the following measures:

- Our marketing team members possess the requisite knowledge of the advertising codes.
- Any new or materially different materials are reviewed by our compliance team before release for tone, intent and whether materials are in violation of any regulations.
- Broadcast advertisements are reviewed to ensure they are compliant ahead of submission to Clearcast (a non-governmental organisation that pre-approves most television advertising in the UK, www.clearcast.co.uk).
- Conduct thorough due diligence when working with affiliates or other third-party marketing firms, ensuring compliance with our terms and conditions (which includes a requirement to comply with all applicable laws and regulations) and approval processes, and we continuously monitor their compliance performance.
- Established clear criteria for our social media interfaces with customers (and non-customers), including stringently vetting the follower base of social media influencers to ensure their underage following does not exceed our thresholds.
- Exclude all social media channels that have a relatively larger user base of under 18s (e.g., TikTok).
- All online interfaces are executed within established parameters; all our online promotions are age-gated and contain the necessary signage indicating potentially harmful content for underage viewers.

Reflecting our values as a responsible operator, we go above the requirements in certain cases. In Grosvenor, our targeted offers are split according to customer value segment; this ensures that promotions are appropriate to each individual's level of play.

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

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



Mecca, Luton



Mecca, Luton

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 promote 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, we ensure that social media ads are only targeted at people over 25 years old, and we only show YouTube ads to people that have been age verified. Additionally, 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.

Furthermore, any UK digital customers scoring over a particular level on our Markers of Harm model are prevented from receiving CRM activity and have reduced visibility of on-site marketing and promotional assets.

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

Customer service

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The business is always striving to deliver the best service to our customers. Customer interactions happen in venues when serving our customers, as well as through our various customers service channels.

Our customer service centre is therefore critical to our ability to meet the needs of our customers.

Foremost, the team provides customers with the support they require in a timely and friendly manner. At the same time, the feedback received from customers is important for taking learnings, implementing improvements, and developing our offering, ensuring that our products and services remain relevant.

Safer gambling also clearly informs some customer interactions; for more details on our approach to engaging with customers from a safer gambling perspective see page 28.

Communicating with customers

We engage in a variety of ways, from face-to-face interactions in venues to email and telephone contact. To facilitate ease of communication, there are a number of customer feedback channels in the UK.

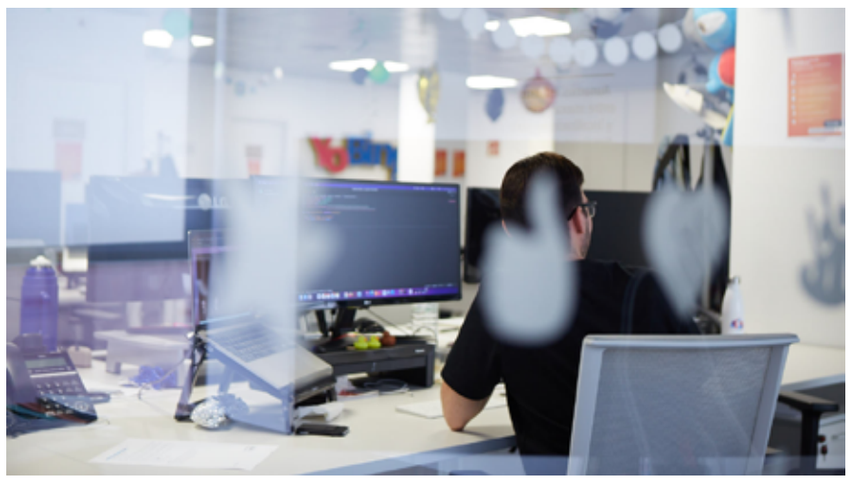
We have also continued to adapt and improve our service capability, introducing different methods for customers to get in touch and utilising new technology solutions.

- In our venues, customers can **speak directly to colleagues**.
- The customer service team can be contacted via **live chat, email, or phone**.
- There are **"Contact Us" or "Support" options** on the websites of all our digital brands.
- On our Mecca sites, the online chat room feature always has a **Chat Host present to converse with customers**.
- This year we **launched AI Chatbots** on all UK brand sites, improving responsiveness to customers. The Chatbots have an average response time of less than one second and are able to resolve a large number of queries first time, thereby improving the availability of our customer service team specialists for resolving more complex service issues.
- **We will be launching our new Customer Service Portal** to provide customers with a self-service option for common issues such as login problems or account maintenance. We also plan to implement self-service options for more complex issues and enable customers to view updates on live service issues.
- In the coming year **we will be rolling out our generative AI co-pilot**, which will work alongside our customer champions by suggesting the best solutions to customer issues and the next best action to take. This will reduce the time taken to resolve issues and expedite team members' learning curve.

Customer complaints received

1,716





As well as the improvements we have made during the year, by tracking our response times and ability to resolve complaints in the first instance we are ensuring that our communication channels are as effective as possible. All our digital brands include information about how to make a complaint (through the complaints or terms of use links in the footers of the websites).

Our customer service centre champions are the frontline agents trained to deal with most complaints, while more complex issues are escalated to the second line team. A customer in the UK can choose to have a complaint independently adjudicated through the Independent Betting Adjudication Service ('IBAS').

In Spain, customer service is paramount; we always have colleagues on the venue floors and provide training on how to support customers and deliver an excellent experience. Complaints in venues can be received by the colleagues on the floor or escalated to the club's general manager, submitted via an email or physical complaints form, or posted online through search engine reviews, which our marketing team review. We also have a Contact option on our website which provides a telephone number and email address.

For our international digital brands, customers can use live chat, email or phone to contact customer services. There are also chat moderators on the bingo chat who feed back any complaints from that channel. We have a weekly report on customer service which is shared with management and the wider business unit.

When an employee joins our UK customer service centre team, they go through the Academy. This is a 12-week training programme which introduces the business and its products, as well as equipping new team members with the skills required for their role. All frontline colleagues receive safer gambling training to improve their ability to recognise vulnerabilities in individuals who contact the team and, if they arise, to be able to handle 'threat to life' situations.

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Customer service

Responding to feedback

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.

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.

This year, we have seen an increase in our venues' customer NPS for both Grosvenor and Enracha, whilst Mecca maintained a strong NPS of 78.

Net Promoter Scores

Mecca venues' customers

78

Grosvenor venues' customers

71

Enracha venues' customers

56



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Customer privacy and data security

We have mature processes in place to protect our customers' privacy and keep their data secure. We maintain robust data security and cyber security procedures and programmes and provide training to our employees to encourage vigilance.

Data protection

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

A report is produced for the Audit Committee twice a year or more frequently, as required. Our Spanish business aligns to the same framework; an external local data protection officer provides guidance and support with monthly reports provided to the Group DPO. The Data Governance Council has been refreshed with stakeholders and decision makers from across the business to improve visibility, responsibility and accountability.

We have a mature approach to data management and security; our priority is to ensure data is used in a fair and transparent manner and prevent breach or loss of data by understanding the risks presented by wrongful access, whether by our colleagues, customers, suppliers or third parties. This is managed via appropriate tooling and processes, with broad alignment to ISO 27001 and enhanced requirements of other regulators, including the Gambling Commission in the UK, the Information Commissioner's Office ('ICO') and 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.

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.

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

Our Data Protection Policy provides direction on data handling matters, including user rights, data retention, data sharing and security. The policy is reviewed regularly to ensure it aligns with changes in regulation, and all employees must adhere to these stated procedures.

In Spain, we review our Data Protection Policy annually; all new employees must read and sign the policy to demonstrate acknowledgement and their responsibilities regarding data protection.

Our data breach reporting process encourages colleagues to report near misses in order to reduce the number of actual incidents, as people are more aware of the risks, and improvements to processes can be identified before a breach occurs.

Employee awareness

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

- A compulsory information security induction and completion of annual data protection and information security refresher training.
- Bespoke training on data protection is provided to colleagues responsible for product development and for high-risk roles.
- Awareness campaigns are tailored to the location of colleagues, such as office-based posters reminding our office teams how to securely dispose of printed materials and reminders about the risk of phishing attacks.
- Site visits are carried out by the information security teams as appropriate.
- All team members are required to engage with security forums and attend security expos and maintain their own development and accreditations.
- Best practice newsletters are sent out every month to bolster knowledge and keep employees abreast of cyber trends.

Data protection training is included in the welcome pack for all new employees in Spain.



IT security

We 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 development, security and operations ('DevSecOps').

The protection measures we employ are dependent upon the level and type of security required. These include, but are not limited to, password management (complexity and frequency of change), multifactor authentication, firewalls, encryption, 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. Our dedicated SOC team reports any activity of concern directly into our internal Information Security Team, ready for further investigation and next actions.

To ensure the effectiveness of our systems, we contribute to regular internal and external audits and assessments. Accredited vulnerability audits and scans are carried out on a monthly basis, audits for the Gambling Commission and our PCI-DSS compliance are carried out on an annual basis and internal audits are carried out on a project and risk basis.

The Gambling Commission requires Rank Interactive to undertake and pass an annual Security Audit. The framework is aligned to the ISO 27001:2013 standard, totalling over 60 security controls being audited, and multiple stakeholders across the business being involved in the process.

We also run formal IT security risk-assessment programmes and tooling (the applications and services we use to assist us with the assessment process), 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 penetration testing programmes; additionally we have an annually conducted validated penetration test run by an accredited third party. 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 runbooks which adhere to best practice and governing bodies' requirements and statutory reporting time frames.

We recognise that due to our reliance on technology and advanced information systems, there are business continuity risks posed by disruptions of operations, such as cyber-attacks. For this reason, we have Cyber Liability Insurance and have robust disaster recovery processes and mitigations in place to minimise the impact in the event of a disruption or security event.

For the Spanish digital business, the IT security team is managed by our Spanish-based IT team and supported by the Group IT Security team. Whilst the IT security is managed by our Spanish IT team, the working practices and security standards are aligned to and audited against Group standards. In Spain, the IT security for our Enracha venues is managed externally.

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Health and safety

Ensuring the physical health and safety ('H&S') of our customers and colleagues is of paramount importance as we are operators of multiple physical gaming venues across the UK and Spain.

We are dedicated to maintaining the highest standards in H&S throughout the Group. Our commitment includes continually enhancing and updating our processes to align with local government regulations and industry codes of practice.

In the UK, we have a dedicated team responsible for overseeing the management of H&S at all our clubs and support offices. The team is led by our Head of H&S, who is supported by a team of H&S regional managers and coordinators.

Under this management team, and at each of our venues, our General Managers are delegated the responsibility of meeting our adopted standards.

This year, we have bolstered oversight of H&S with an additional regional health and safety manager. The increased team capacity has allowed the H&S team to internalise the previously outsourced auditing of food safety. Our H&S team is now responsible for overseeing H&S and food safety. Responsibility for the management of fire safety has been divided between the in-house H&S team and an accredited third-party provider.

Number of accidents reported under RIDDOR (UK venues)

7

Number of accidents (UK venues)

383*

*These relate to our colleagues, with top factors being slips, trips and falls.

Audits

The H&S team visit every club and support office once a year to conduct a comprehensive H&S and food safety audit, with further support provided where required. The H&S team also monitor fire safety between the formal fire risk assessment schedule.

Fire risk assessments

An external accredited fire risk assessment provider will conduct fire safety risk assessments at all venues this year with a view to creating a risk profile of the entire estate. Formal fire risk assessment schedules will be assigned, with the H&S team conducting interim reviews and monitoring as required.

Learnings

Audit results are communicated to the venues' leadership team and their progress is monitored on an ongoing basis. The increased resourcing capacity within the H&S team has enabled them to revisit venues to provide additional support where needed, assisting the venues' operations with the implementation of escalated actions stemming from audits and conducting additional reviews as necessary. The frequency of these revisits can vary based on specific needs.

Facilities management

The H&S team work collaboratively with the internal and external facilities management team to ensure that plant and equipment maintenance and compliance is included in the venue audits. This year, the agency conducted an audit of all our documentation and maintenance requirements which identified areas for improvement we will focus on.

Policies

H&S policies are reviewed on a regular basis and assured by our prime authority, Wakefield Council. We are streamlining our H&S-related policies and developing 'How-to-Manage' guidance documentation to support policy implementation. This will enrich our colleagues' understanding of our health and safety, food safety and fire safety procedures and support more effective execution of the same.

Our H&S team is also in the process of launching a new Food Safety Management System and Allergy Policy to provide assurance and guidance on food safety. Current policies: Accident Management; Allergen Policy (launches July 2024); Asbestos; Building Plant and Equipment; Controlling Contractors; Display Screen Equipment; Electrical; Emergency Action; Fire; Food Safety Management System (launches July 2024); Hazardous Substances; Legionella; Lift and Lifting Equipment; Lone Working; Manual Handling; Noise Policy; PPE; Safeguarding Policy; Safety Provision Policy; Smoke Free Policy; Stress Policy; Violence at Work; and Working at Height.

Management system

Our H&S management system (informed by H65 guidance published by the UK Government's Health and Safety Executive) consists of all related policies, risk assessments, training and communications. All internal audits are conducted in line with this guidance.

Training

H&S training is available to colleagues on our online platform, Springboard. There is basic H&S training for all employees which must be completed during onboarding and then annually, while specialist training courses are made available to venues-based employees, the extent of which varies dependent on an individual's roles. This year the entire management team across our venues are food hygiene trained to Level 3. We have implemented fire safety training as a separate course for all our employees as well as fire warden/marshal training for those who have specific fire safety responsibilities.

Reporting

Audit data, updates on the training completion, and planned preventative maintenance ('PPM') reports are communicated to the Risk Committee monthly and to the Audit Committee twice a year or more frequently as required.

In Spain, health and safety is managed by an external provider. This provider operates in compliance with Spanish law on occupational risk prevention, taking actions to minimise risk to the health and safety of employees, including risk assessments, preventative planning (specific actions to prevent identified risks from occurring) and carrying out medical check-ups.

Training is also provided to colleagues when they join the business, and refresher training is carried out when required. Audits of venues for health and safety and food safety are conducted. Firefighting equipment is subject to regular maintenance and inspections.

Colleagues

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40	Equality, Diversity and Inclusion
42	Engagement and reward
45	Mental health and wellbeing



Employee Net Promoter Score ('eNPS')

39

Percentage of women in senior roles*

34%

Employee engagement score**

79%

Launched Connect, our new global communications and engagement platform, enhancing our ability to communicate and connect with colleagues, especially those in our venues.

Achieved a reduction in the gender pay gap and an increase in female representation.

Continued to roll out our employee value proposition, Work. Win. Grow., across our brands and working to embed it into every element of the colleague experience.

Expanded our colleague mentoring programme to 150 colleagues.

* Position at 30 June 2024.
** We will be using employee engagement score rather than eNPS as an indicator for colleague sentiment going forwards.



We prioritise creating positive working environments for our colleagues and this involves driving engagement, offering development opportunities, and ensuring fair treatment and support for all.

We want to deliver value to our colleagues at every stage of their journey and therefore take a comprehensive view of the employee lifecycle. To effectively manage our people and culture function, we have structured it around the following key areas: 1) Business Unit People Directors; 2) Reward, Performance & Operations; 3) Communications & Engagement; and 4) Talent Acquisition, Talent Development & Learning.

The function is led by our Chief People Officer, who is ultimately responsible for the implementation of our people and culture strategy, plans and action, and who reports to the Board and provides quarterly updates on culture, capability, succession and development, and ED&I to the Nominations Committee. Accountability for management of teams then flows down through the People & Culture Business Partners and leaders and managers.

There is a regular Board agenda item on colleagues and a reporting cycle which we set annually, as well as a biannual detailed discussion on colleagues on the ESG & Safer Gambling Committee agenda.

To support our effectiveness as a team and introduce efficiencies, we employ technological solutions where applicable. Our employee engagement platform, run by Peakon, provides our employee surveys and allows us to assess the data outputs and create and monitor action plans. Our HR system, Dayforce, combines all facets of people management in one platform.

This year we launched a new communications and engagement platform, Connect, to improve accessibility of company information and help all colleagues across the Group to feel connected to the business. Springboard is our global e-learning platform, through which we provide access to training and development resources, as well as monitoring completion of mandatory training, while in Spain this is done through the Campus platform.

The introduction of data dashboards for each operating location has further improved our ability to track workforce data and assess the effectiveness of our people-focused initiatives. We have introduced an additional learning platform through Mind Tools, called Love to Learn, which provides tailored learning opportunities, masterclasses, podcasts and educational materials to all colleagues globally.

Our recognition and reward platform Full House was launched during 2023, with our Mecca colleagues trialling the full recognition potential of the platform to deliver monetary recognition prizes, gifts and awards to recognise colleagues for great customer experience, living through our STARS values and creating a great place to work.

Case study
Our EVP in practice

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Our Employee Value Proposition ('EVP'), Work. Win. Grow., was designed to capture every element of the employee journey. It is underpinned by our values and encapsulates the culture we want to foster at Rank.

We have been working hard to weave the EVP throughout everything we do for our colleagues. We interviewed **Pauline Flynn** to talk about her experience at the company and how Rank is delivering on Work. Win. Grow.



Training and development

How does Rank support its colleagues to advance in their careers?

My personal experience at Rank demonstrates how you can work your way up through the business. I first joined the business at age 18, working as a receptionist. Since then, I've worked as a dealer, inspector, pit boss and manager.

I joined the Grosvenor Development Programme for General Managers, through which I was able to complete a secondment at another venue and gain valuable experience, and I have now been the General Manager at Grosvenor Northampton for several years.

I think that Rank has got so much better at colleague development in the last few years; just within Grosvenor, we now have strong development programmes in gaming and on the hospitality side, as well as management training. The Love to Learn learning platform and the development we are seeing through the Like to Love programme are also contributing to providing additional opportunities for all colleagues.

Equality, Diversity and Inclusion

What has been your experience as chair of Women@Rank?

Women@Rank is a fantastic group to be a part of. Anybody can be involved; we have people from across the business, from junior colleagues to members of senior management, and we have male allies too. Our Executive Sponsor really supports us and drives our agenda forwards, and we are feeding back to the Chief People Officer on our work and what we want to achieve. We have been very focused on tackling topics that people might find challenging to discuss, such as the gender pay gap, and have surveyed colleagues about what we should be addressing.

A key focus in the coming year is about awareness and communication of the things we do at Women@Rank and what we can do to support women in the business in the future, exploring mentorship, sponsorship and succession planning.

Engagement and reward

As a manager, how important is it to be engaging with your team?

I love my venue – we have a great community of colleagues and customers. For me, nurturing, supporting and listening to my team is really important, not only for improving their experience, but also for our customers.

This year, we launched Like to Love, our cultural change programme with the aim of moving customers from Liking all we do at Grosvenor to Loving all we do, and within the programme is also our key objective to continue to work towards becoming an admired employer.

We know that many of our colleagues like their work, but we wanted to push the dial forward on that. We know that when you love your job and the people you are surrounded by also do, you get great satisfaction from it and become an ambassador for your organisation, venue, or role. That enthusiasm really shines through to our customers, who in turn enjoy their experience more. I think that is really apparent in our venue!

Mental health and wellbeing

What do you do to support the mental wellbeing of your colleagues?

Looking after the wellbeing of our colleagues has been a real focus for me, and I have been a mental health first aider for over three years now.

During lockdown, I started Wellbeing Wednesdays, where I would check in with people, providing them with a safe space to talk about various topics. This gained a lot of momentum, and I had people reaching out to me from venues across the Grosvenor estate to discuss problems they were facing and get advice and support.

To this day, I am still running Wellbeing Wednesdays, and I know that other venues have wellbeing groups, sessions and check-ins of their own. I think this has been really important for creating a culture of openness and acceptance around discussing mental health and I am pleased to see how this has proliferated throughout the other venues in the business.

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Case study
Our EVP in practice

Our purpose

To **excite** and to **entertain**

To deliver exciting and entertaining experiences in safe, sustainable and rewarding environments.

Provide a seamless experience | **Drive digital growth** | **Evolve our venues** | **Passionate about our colleagues** | **Build sustainable relationships**

Our **values** – The way we do things

Service | Teamwork | Ambition | Responsibility | Solutions

The leadership expectations – Our framework

Leading Yourself | **Leading Others** | **Leading the Business**

The colleague lifecycle – WORK. WIN. GROW.

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

Delivered through our brands

Rank Group | Grosvenor Casinos | Mecca | enracha | YoCasino | YoBingo | YoSports | Magical Vegas | Regal Wins | Lucky Pants | Kitty Bingo | spin&win

Training and development

Leadership capability

The direction from our leadership is critical for the continued success of the business. Having experienced leaders equipped with the appropriate skills and understanding drives the business forwards, while developing a strong pipeline of talent secures our future success. We aim to provide career advancement opportunities to encourage colleagues to grow within the business.

To achieve this, we employ the following:

- Annual skills reviews are conducted to assess knowledge and experience of our Board.
- Biannual reviews of our Executive and two levels below Executive are conducted to consider high potential capability and any competency gaps.
- The Board is provided with regular corporate governance and industry updates, with particular focus on safer gambling and ESG matters, and specific Board training.
- Bespoke coaching is offered to members of senior management with succession potential.
- Succession plans are maintained through the Nominations Committee for the Board, Executive Committee and other members of the Senior Leadership Team.
- Our leadership capability framework identifies consistent leadership expectations and helps to ensure that there will be continuity of capability in key roles.
- Data and insights from leadership reviews are utilised to identify talent and inform the development opportunities required.
- Bespoke development programmes, including our Henley Partnership, Shine (Women in Leadership), and Leading and Managing at Rank, are offered for individuals across the business identified for their leadership potential.
- Mentoring@Rank programme provides exclusive internal mentoring opportunities that allow colleagues to network with, learn from, and support each other's development and growth.
- General Manager and Assistant General Manager development programmes for Mecca and Grosvenor focus on future talent and developing a succession into key roles across our venues.

Development opportunities

We want our colleagues to feel engaged and enjoy being part of the Group. Enabling development of new skills and broadening of knowledge is a crucial part of the colleague experience, as it allows individuals not only to excel in their roles but to also advance their own career goals. By developing our existing colleagues, we have a strong pool of candidates for internal promotion.

At Rank, we provide a range of learning and development opportunities:

- Annual performance reviews and mid-year check-ins are carried out. We are currently reviewing the process in order to implement improvements, as we recognise that the performance reviews are key for colleague development.
- Our e-learning platform, Springboard, 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.
- A formal process enables colleagues to apply for support to undertake external training, such as Mini MBAs and project management courses.
- We launched a new learning platform Mind Tools (renamed Love to Learn) which offers tailored individual learning, education and development for colleagues, allowing individuals to create individual playlists of learning.
- Udemy technical training continues to support our colleagues working in specialist digital and technical roles and we have increased the scope of this given increased demand.

In Spain, we also have bespoke training opportunities:

- Our training platform, Campus, gives colleagues access to different soft skill courses, and also acts as a means of talent detection, identifying colleagues that have obtained strong results on completion of training courses.
- Silver Talent is a scheme intended to provide professional development of skills and technical abilities for high potential individuals. This is a two-year scheme with training on leadership, competency and business management, delivered across 12 classroom and six online sessions led by external trainers and experts in each subject area.
- Colleagues are financially supported if they apply to undertake external training such as a master's degree or professional certification that will support their professional development.

Talent attraction

An effective and fair hiring process is critical to attract the best talent to the business. As well as using our own careers website, we publish job vacancies across a number of channels such as LinkedIn, Indeed and 55/Redefined. We are considering utilising other channels with a focus on increasing the diversity of the candidates who are applying and have also ensured our in-house recruitment teams receive unconscious bias training to aid this.

To further improve our hiring process, we will be rebuilding our recruitment system, updating our careers website, and providing further guidance and training to hiring managers. By undertaking these changes we can provide efficiencies, improve the recruitment experience and attract the highest-quality candidates.

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

Case study
Mentoring programme

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Last year, we introduced an internal mentoring programme, Mentoring@Rank, in our UK digital business to support 50 colleagues with both their personal and professional development.

This year, we expanded the programme across the entire Group, now providing mentoring and mentee opportunities to 150 colleagues across various roles, enabling them to network, learn from each other and support one another's development and growth. Our programme has seen a higher proportion of female mentees (59%), with male mentors being more common, making up 60% of the mentors. Additionally, 5% of participants have chosen to share that they are part of the LGBTQIA+ community, and 20% were specifically paired to help navigate the workplace as minorities.

This data reveals three key actions to guide our future intentions for the programme:

1. Examine strategies to motivate more women to become mentors, balancing the gender ratio.
2. Explore whether the higher number of female mentees suggests a greater need for mentorship among women and adjust recruitment efforts accordingly.
3. Ensure the programme materials and outreach emphasise inclusivity and encourage diverse participation.

Our mentoring tech platform, Mentorloop, automatically matches mentors and mentees. These matches are then reviewed by the Learning & Development team to ensure the pairings will maximise the success of the relationships and the overall experience.

In the year ahead, our focus is to increase the number of participants to 250 and upgrade the technology to improve functionality, support and overall colleague experience.

> **Very thought-provoking and full of great tips. I came away with some really useful things to put into practice. It was lovely to get positive feedback in an area where I thought I wasn't strong. I came away from the programme with more confidence, and I feel the energy [my mentor] brought to our meetings will be really beneficial to me in the future.**



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Equality, Diversity and Inclusion

We are focused on building the right culture and behaviours throughout Rank, making them part of everything we do. To foster Equality, Diversity and Inclusion ('ED&I') in our business, work is ongoing to deliver against our four stated aims, as outlined below.

We are continuously reviewing our progress against these aims as the business evolves, providing updates to the Nominations Committee and Board, as required. We are taking a global approach with an understanding there will be nuances by country, given cultural differences.

We have made great progress in our efforts to close the gender pay gap. Our latest report shows that in 2023 the gender pay gap fell to 5.2% (median), which is lower than the UK average. We reported on this at March's Remuneration Committee meeting.

Overall, our gender split has decreased from 46.67% female in November 2023 to 46.35% female in May 2024. We have had a 4% increase in female managers, which reflects our continued commitment to building a diverse and inclusive workplace where everyone has equal chances.

The level of ethnic diversity across the UK (only where we hold data) has again improved slightly, as we have increased to 17%.

Percentage of all employees that are women

46%

Gender pay gap

5.2%

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

- Through our new global communications and engagement platform, Connect, we are now able to reach every colleague across the Group and our communications are more inclusive than ever before by allowing colleagues to switch languages and instantly translate updates as needed.
- Connect makes our colleague network groups (Women@Rank, LGBTQ+, READ, Neurodiversity and Worklife & Wellbeing) more accessible to venue colleagues, providing support and resources at their fingertips for the first time.
- Maintained efforts to be recognised as an admired employer through our social media and internal comms channels, with the announcement of Emily Stratton, GM at Grosvenor Manchester Bury New Road, as the winner of a Rising Star Award at the European Casino Awards in February 2024. Likewise, the work behind Connect made Serina Donkin, Head of Communications & Engagement, Positive Role Model of the Year winner at the Women in Gaming (WIG) Diversity Awards in June 2024. Hazel Boyle, CPO, was shortlisted at the WIG Awards for her work on the Group People and Culture & Engagement Strategy.

> **"We couldn't be prouder of Emily's accomplishment. Since joining us in 2000, she has steadily risen through the ranks, assuming the role of general manager at the remarkable age of 34, all while balancing the demands of family life. This is a very well-deserved win!"**
>
> **Mark Harper**
> Managing Director, Grosvenor Venues

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

- ED&I policies cover the wide-ranging needs of our workforce: flexible working is offered and enhanced maternity leave pay is provided at two levels (for all colleagues who have been with the business for at least 12 months continuously, as well as a Manager Enhanced Maternity Pay programme for women in leadership, management, or pathway into senior management roles).
- Conducted an internal review of our people and culture policies to ensure compliance and inclusivity in purpose and language, and to identify policies that required updates or changes to enhance our inclusive culture.
- Launched our Family-Friendly Policy in the UK, receiving very positive feedback from colleagues, with a planned global rollout in the coming year.
- In collaboration with 'Inclusion In' and with valuable input from our LGBTQ+ network members and transgender colleagues, currently drafting a Trans Equality Policy, to continue to support colleagues who identify as trans and/or non-binary.
- Grosvenor launched its Like to Love vision which will help foster a positive and inspiring workplace for current and future Grosvenor colleagues.
- Ensure all our job descriptions highlight hybrid working opportunities, family-friendly policies, and other benefits that support colleagues' personal and professional lives. We are using an inclusive language tool to write job adverts and post job openings on the 55/Redefined job board to show our ongoing commitment to being an age-inclusive employer.
- Recognising the diverse cultural and linguistic backgrounds of colleagues, we have provided translation ability on the Connect platform to ensure inclusivity and understanding.
- Developed localised initiatives that prioritise colleague wellbeing, including mental health programmes, specific to location and cultural needs.
- Dedicated recruiters in Mauritius and Cape Town to manage local partnerships and activity.



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

- Zero-tolerance approach to discrimination of any kind, and this is enshrined in our Group policies; colleagues have mandatory ED&I training on joining Rank and must complete refresher training periodically.
- Offer mentoring and enable individuals to undertake external courses.
- Launched pilot phase of female leadership development programme, Shine, aiming at building confidence and clarity for female colleagues about their career possibilities. Over the course of three days, participants are challenged and coached to build a vision and plan that gives energy and focus to their personal and professional lives.
- Tracking participation in our Mentoring@Rank programme, from which we have identified three key actions to guide our intention moving forward:
  1) examine strategies to motivate more women to become mentors, balancing the gender ratio,
  2) explore whether the higher number of female mentees suggests a greater need for mentorship among women and adjust recruitment efforts accordingly, and
  3) ensure the programme materials and outreach emphasise inclusivity and encourage diverse participation.
- We have built a dashboard which captures representation in the workforce by demographic, gender and location and we will continue to build this out to ensure we fully understand the diversity of our workforce. This will be used to provide the Executive Committee, Board and wider business with updates on the Group's ED&I performance.

4. Make equality integral to how we do business

- Our five ED&I colleague groups – READ (Race, Equality and Diversity), LGBTQ+, Worklife & Wellbeing, Neurodiversity, and Women@Rank – act as discussion forums and each has an Executive sponsor to support their objectives.
- Linked with leading external ED&I partners: Women in Hospitality, Travel and Leisure ('WIHTL'), Corporate Research Forum ('CRF'), 55/Redefined, Included, and Inclusive Employers.
- Include ED&I questions in the Employee Opinion Survey ('EOS') to gather feedback on our performance in this area.
- Ran a survey for International Women's Day to learn about the female experience at Rank and asked colleagues to help us find ways to improve and ensure equality is integral in every aspect of our operations. We are using responses to pick appropriate focus areas for the Women@Rank network for the upcoming year – the network leads will work with the business on these to support and promote female development across the Group.

In Spain, we have been focused on enhancing the professional growth of women working within our venues. We have equality plans in place to promote gender equality at each of our Spanish locations, in line with requirements from the Spanish Government.

We have protocols in place for reporting moral and sexual abuse or harassment at work.

Case study
WIG Diversity Awards 2024

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There are so many amazing women working across the Group and we are always proud when we see our colleagues recognised outside of the business.

The Women in Gaming (WIG) Diversity Awards were established to reward excellence in the industry from an Equality, Diversity and Inclusion perspective. This year, our Head of Communications and Engagement, Serina Donkin, won Positive Role Model of the Year.



I am honoured to have been chosen as the 'Positive Role Model of the Year' at the Women in Gaming Diversity Awards. This recognition reflects not only my efforts but also the fantastic support from Rank and my colleagues. I am proud of the inclusive environment we have at Rank, which has enabled me to thrive and grow as a professional. The guidance and mentorship from my manager have been invaluable, and I appreciate the trust and encouragement she has given me. I will continue striving for excellence and aim to be a positive influence on female talent in our workplace.

Serina Donkin
Head of Communications and Engagement

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Engagement and reward

Reward and recognition

Providing an attractive working environment, where colleagues are rewarded and recognised for their work, is crucial to being an admired employer. In addition to competitive and fair pay, benefits on offer focus on improving colleagues' wellbeing.

- During the course of the year, we have continued to develop our offering, improving our ability to recognise where colleagues are outperforming and expanding the opportunities for providing recognition and reward.
- Our recognition platform, Full House, enables peer-to-peer recognition and has seen increased use, especially in Mecca. We have introduced a points system in Mecca where the leadership team can award points to colleagues who go above and beyond in their work. Colleagues can redeem their points for items on the built-in discount platform, which features high street shops and online brands.
- To facilitate the reward of outperformance by colleagues, we are undertaking a review of venues' management's bonus plans, to support incentivisation of exceeding targets.
- This year we created new data dashboards in every country of operation which track colleague data such as demographics and performance. This allows more granular assessment of data, monitoring such metrics as attrition, identifying colleagues that are performing well and gauging the effectiveness of our people-focused initiatives.
- Our Employee Assistance Programme ('EAP') provides colleagues access to affordable quality medical care through our medical plans and location-appropriate financial wellbeing support.
- Our awards programme, STARS (Service, Teamwork, Ambition, Responsibility and Solutions), recognises individuals or teams nominated by their colleagues for exemplifying Rank's values in their work. The awards are presented at our global Town Halls for both office and field-based colleagues. Following the Group quarterly STARS awards, finalists are put forward for local STARS awards. Additionally, STARS awards are held annually for our venue teams.
- We have been developing Work. Win. Grow., our employee value proposition ('EVP'), with a focus on recognising the varied experiences our colleagues have across different parts of the business and crafting a bespoke offering that meets everyone's needs.
- We have completed our minimum wage audit and await final feedback, completed the annual Group pay review, and concluded our union pay negotiations across London.

Employee engagement

We are a globally diverse business with 7,600 colleagues spanning various roles in land-based venues, field-based positions, and offices across seven jurisdictions Therefore, having effective and consistent means of communication with our colleagues, and a robust listening strategy that enables colleagues to be heard, are important ways we measure engagement and sentiment.

We utilise multiple engagement channels to make sure that all colleagues have the opportunity to feed back to the business on their experience. Leaders are encouraged to actively engage with colleagues through open-door policies and personalised communications.

This year, the introduction of our employee communications and engagement platform, Connect, has been crucial for making sure we are connecting with every colleague in the Group, regardless of geography, language or business unit.

- Our Employee Opinion Survey ('EOS') is conducted twice a year in all locations; an in-depth survey covering all aspects of working at Rank and a 'Pulse' survey six months later that focuses on key engagement drivers. Our EOS gauges engagement levels and gathers feedback on all aspects of our colleagues' experience and there is an opportunity for colleagues to give open-ended comments.
- Employee Net Promoter Score ('eNPS') serves as our Key Performance Indicator for employee satisfaction and is linked to executive remuneration.
- Feedback is actioned through a You Said, We Did framework. In Spain, feedback is analysed by management and a meeting with the colleagues in each club is hosted to present the results and answer any questions.
- The Rank Resource Hub (Sharepoint) serves as a hub for all key colleague and business policies and guides.
- The launch of employee communications and engagement platform, Connect, this year has improved our ability to provide timely, relevant and engaging updates and be a driver in further building a culture of two-way communication. Connecting with our venues' colleagues was a key motivation for launching this platform, as those colleagues who are not office-based lack the ready access to company information.
- Town Halls are conducted monthly, led by the Chief Executive with presenters from across the different areas of our business, with a Q&A where colleagues are able to ask questions and have the option to submit these anonymously. Colleagues can attend the sessions or access the recordings.
- 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 held biannually and provide a forum for key individuals from across the business to debate issues impacting the Group and are attended by Rank's Chief Executive, Chief People Officer and other members of the Executive Committee.
- We conduct hiring, onboarding and long service surveys, as well as exit interviews.
- There are Board venue visits and our designated Non-Executive Director ('NED') for workforce engagement spearheads confidential employee listening sessions across the Group, both in person and virtually, and reports formally to the Board on key matters discussed in these sessions.
- Hold General Manager team meetings, Regional Operations meetings, and venue listening forums with the Managing Directors of Mecca and Grosvenor venues.
- In Spain, we have an internal communications email through which we can receive and respond to colleagues' questions.
- Open line of communication with union bodies, holding regular meetings, and conduct annual pay reviews. In Spain, on an ongoing basis in all the clubs, as well as at regional and state level, we have forums for the negotiation of agreements of national or regional application.
- Speaking Up, our whistleblowing platform, managed by an independent service provider, has multilingual communication channels and ensures anonymity of the individual reporting a concern.
- We have a Grievance Policy in place and the grievance mechanism is managed by our People and Culture team, providing another avenue for colleagues to raise concerns.



Engagement and reward

Employee engagement

Through this broad array of communication channels, we gain great insight from our colleagues, and it is crucial that this is tracked and reviewed, and plans formulated and actioned, to address concerns or improve the colleague experience. All insights collected from the EOS are housed on an online platform for detailed assessment of data and identification of any issues.

Learnings from EOS are shared with the Executive Committee and Board to assess feedback and create action plans for managers as required. Issues raised through our whistleblowing platform and grievance mechanism are tracked and followed up on according to the proper process.

The results of our latest pulse survey demonstrate a very good level of engagement across Rank, with the employee Net Promoter Score ('eNPS') 39. Going forwards, we will be using the employee engagement score as the KPI for colleague engagement; this was 79% for this year.

Number of Town Halls

12

Case study
Introduction of Connect

With a workforce of over 7,600 colleagues in multiple countries, being able to communicate with everyone consistently can be challenging. In particular, we recognised that it was difficult for our venues' colleagues to receive company updates given they are not based at a computer in an office.

We were eager to address this and create a platform which was accessible for every colleague, no matter their location, language or role. In May 2024, we launched Connect. This is a global communications and engagement platform available to all colleagues through an app or via the web, using our HR system, Dayforce, to automatically set up colleague profiles.

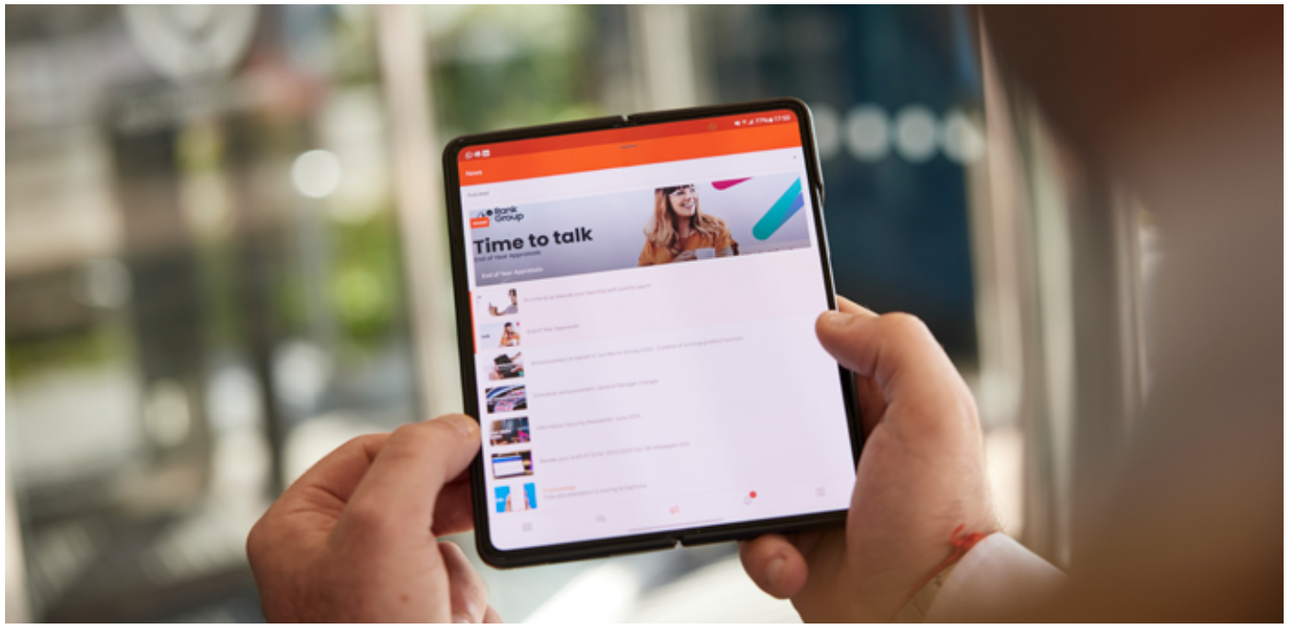
To make sure Connect resonates with people, we designed a bespoke experience dependent on an individual's role within the business.

When accessing Connect, colleagues will recognise the branding for the business unit they work within. They will be automatically assigned to 'groups' for their venue or office location and business area, as well as the All Company Updates group, but colleagues can also opt in to other groups such as the ED&I networks. This ensures that individuals have sight of the information most relevant to them, as well as receiving broader Group updates – all of which are instantly translatable.

Through Connect, colleagues can post on their group pages or privately message their peers – colleagues can also submit questions for the Town Halls and catch up on the recordings through the platform. Events can be created and invites sent to colleagues in a certain venue, region, or even job role. Our communications are also tailored to the intended audience. The launch has been a resounding success, with a lot of positive feedback from colleagues.

The rate of colleagues that have activated their accounts was at 67% three months after launch and shows 1,062 people logging into the platform every day. By creating this platform which tailors messaging depending on the individual colleague, we are improving our connection across the business.

We are continuing to develop the platform, introducing new features and listening to feedback on how we can make further improvements and build on activation and engagement.



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Case study
Workforce engagement sessions

We talked to Edward Wynn, our Learning and Organisation Development Business Partner, about the recent workforce engagement session he attended and the importance of these for colleagues.

Having attended the workforce engagement session at the Sheffield office, how valuable do you feel these are to colleagues?
I think these sessions are incredibly important. Being able to speak directly to a member of the Board is a fantastic opportunity, because you know that this is being fed back to the rest of the leadership.

It was also helpful to get that exposure to a non-executive director to understand what the Board do and their role in governance and overseeing and supporting the business.

I think that really resonated with everyone in the session, because it not only showed that our leadership are not a remote body, but also made us more aware of the strategic direction of the Group, as well as our role in Rank's progress.

Do you think that an open and productive conversation was facilitated in the session?
Absolutely. Lucinda explained why she was there and the purpose of the workforce engagement sessions. She made it clear that the session was an opportunity for colleagues to share with the Board our experiences of working at Rank – the good and the not so good.

Because of this, and the relaxed and informal tone that was set, it felt like a safe space to put forward and discuss our honest views. We were also invited to share what we would like the Board to consider in their decision-making.

It was helpful not only to air any concerns people had but also to share the real positives about the business and to learn about individuals' different roles. Key themes from the session identified the commitment of our people and the fact that we all really enjoy working alongside each other.

I look forward to receiving in due course any responses from the Executive Committee and the Board to the key themes raised and hope I have the opportunity to partake in the next forum.

How effective is Rank's overall engagement strategy with colleagues from your perspective?
I personally feel very connected to the business – receiving updates from the business unit I work within, joining the Town Halls and having attended this session, there's a lot of opportunity to understand what is going on from a Group-wide perspective.

I am also very encouraged by the launch of Connect (the new communications and engagement platform) because I know how effective it will be for communicating with our venues' colleagues.

Also, the encouragement and support that I have had during my time at Rank so far has empowered me to pursue opportunities to upskill, share my knowledge and contribute to making improvements where we see opportunities for them.



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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 Worklife and Wellbeing programme was launched for the express purpose of keeping colleagues engaged, motivated, happy and healthy at work.

- A Social and Wellbeing Squad in each office that organises activities for their colleagues.
- Employee Assistance Programme ('EAP'), Be Supported, is provided by AXA Health, and includes an app designed to build positive new wellbeing habits into day-to-day life.
- Over 240 views of webinar content provided by PepTalk covering a plethora of subjects including mental health and wellbeing.
- Partnered with Mind Tools to launch our Love to Learn platform globally to support colleagues and managers at work with a broad range of learning, support and education tools, as well as resources to support, drive awareness of, and educate our colleagues on mental health and wellbeing.
- Mental Health First Aider ('MHFA') training and having MHFAs in all our UK venues and offices.
- Continued investment in back of house colleague areas across our Mecca and Grosvenor venues as part of refurbishment and Sparkle programmes to ensure colleagues have a good standard of rest and learning space at work.



Case study
Mental health and wellbeing activities at venues and offices

At our Cape Town office, we have implemented a range of initiatives to foster a working environment that prioritises the mental health and wellbeing of our employees.

Each month we hold a mental health catch-up which varies in format in order to engage with as many colleagues as possible. For some sessions we deliver a talk on a specific mental health topic, or use the time to check in with colleagues using prompt questions to gauge sentiment.

Other months we have offsite sessions, going for walks, visiting local coffee shops, or participating in wellness activities. These catch-ups also provide a forum to remind colleagues about the availability of our People Business Partner, who is always ready to offer support. The four mental health first aiders in the office not only provide immediate support, but also run several of the monthly mental health catch-ups.

Recognising the importance of doing different activities in maintaining mental health, we host a range of sports events. We have a couple of five-a-side football teams, hold an annual table tennis tournament and bowls day, and several colleagues have taken part in the Warrior and Titan obstacle races.

Monthly creative sessions offer an outlet for colleagues to do something artistic or learn a new craft. A monthly free breakfast or lunch is offered in the office.

We have adopted a hybrid working model, working in the office two to three days a week to maintain essential in-person connections, while also enjoying the flexibility and benefits of working from home.

We offer medical assistance, contributing up to 50%, and provide access to Rank's global Employee Assistance Programme. Through these varied and comprehensive initiatives, we have created a culture which supports and engages colleagues, and where people enjoy coming into work and connecting with others.

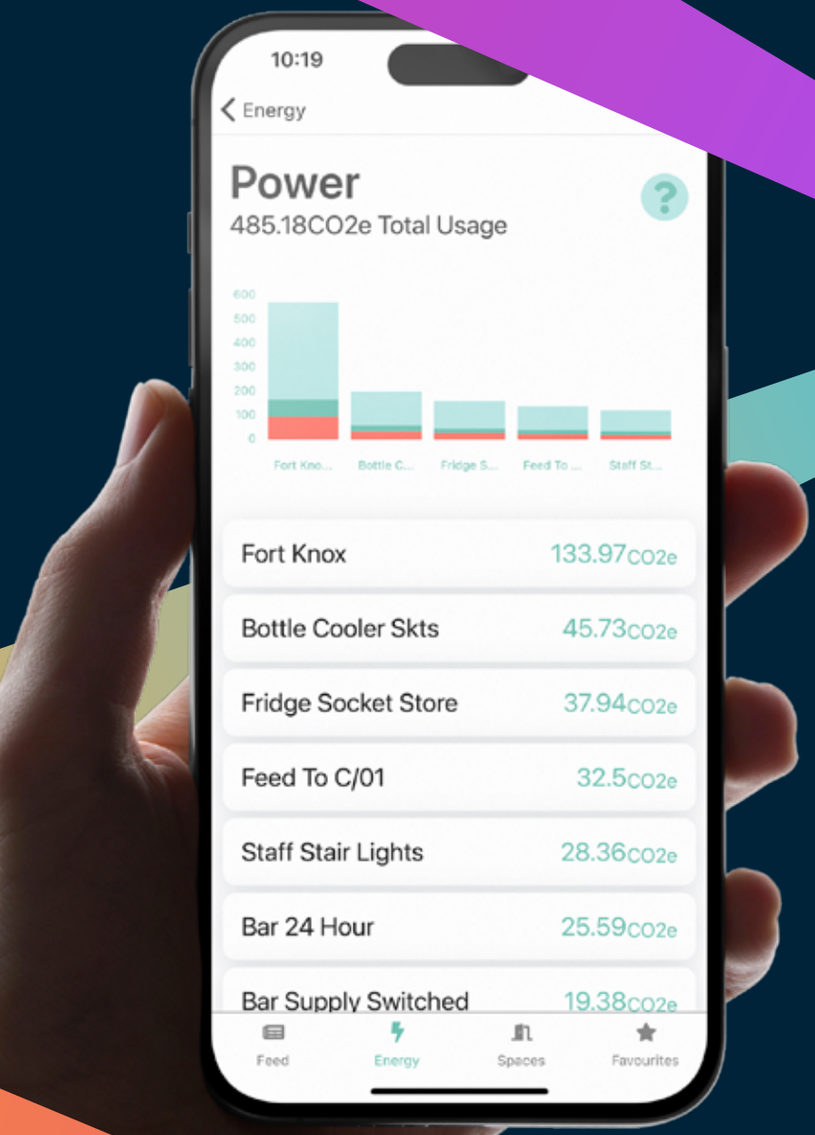


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Environment

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



Absolute carbon emissions tCO_2e*

22,112

Completed asset-level energy consumption data gathering at 40 highest-energy-consuming venues in UK estate and commenced detailed Scope 3 assessment across all relevant categories for the business's value chain.

Completed Scope 1, 2 and 3 baselining for Spanish operations.

Signed a power purchase agreement in the UK to enable use of electricity from renewable energy providers.

Launched programme of engagement to motivate colleagues to join the effort to reduce energy consumption.

Launched a new Supplier Code of Conduct which includes the expectation for suppliers to share environmental performance with Rank.

*This is calculated using Scope 2 market-based emissions.



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

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

Emissions management and climate change adaptation is the issue of main focus of our environmental impact mitigation efforts, as its impact and financial materiality are both significant. However, we continue to consider our waste and water management.

We want to increase the percentage of waste we recycle across the Group. Our waste management provider in the UK, Biffa, assessed recycling rates in our UK venues and provided training to employees on waste segregation.

We have set the goal to reach 90% of waste from our UK venues being recycled in the next three years.

Net Zero Pathway

In our last Sustainability Report we announced our Net Zero Pathway, committing to reaching net zero emissions by 2050. We also set an interim target for all operations to reach net zero on Scope 1 and 2 emissions and selected Scope 3 emissions by 2035.

This year, we have made significant progress delivering on our Net Zero Pathway through a wide range of workstreams. To establish an accurate baseline for our Scope 1 and 2 emissions, we completed energy data capture at asset level for the 40 venues with the highest energy consumption in the UK, as well as calculating Scope 1 and 2 emissions for the rest of our UK estate and for all venues in our Spanish portfolio. We also progressed the Scope 3 data assessment of our UK value chain and completed the Scope 3 baselining in Spain.

By using data to make informed decarbonisation choices, we have begun implementing equipment upgrades and we have started creating behavioural change to reduce energy use.

Through assessing and baselining our energy use, engaging and educating our colleagues, and investing in improvements to our estate, we are beginning to see positive results.

We are pleased to report a 12% reduction in energy use across our UK venues. Furthermore, our carbon intensity ratio was 30.1 tCO_2e per £m NGR, an improvement on the previous year.

Total investment made this year

£8.7m

Total investment planned in NZP over 12 years

£56.7m

YOY reduction in energy use in UK venues

12%



Grosvenor, Luton

“Setting our net zero targets was the first step, but this year we have been developing the detail of our Net Zero Pathway. By gathering venue-level data, we have been able to understand the next steps that will have to be taken, the investments that need to be made and the initiatives launched in order to achieve our ambitions.”

Sarah Powell
Director of IR, ESG and Treasury

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Net Zero Pathway

How do we manage our Net Zero Pathway?

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

The Net Zero Working Group ('NZWG') is responsible for operationalising our Net Zero Pathway. The NZWG is chaired by the Director of IR, ESG and Treasury, who reports directly to the Chief Executive and the ESG & Safer Gambling Committee.

The NZWG manages all decarbonisation initiatives across the UK business, but is also kept apprised of all initiatives in the Spanish locations. The NZWG is comprised of key individuals from across the Group, including the heads of the property and procurement teams, as well as the lead for the decarbonisation initiatives in Spain.

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

2022

Created initial Net Zero Pathway

Commenced LED installation in venues

Q4 Submitted CDP report

Q4 Commenced data gathering through installation of PRISM technology at 40 venues in UK



2023

Q1 Reported on revised Net Zero Pathway based on initial data gathering

Q1 Launched Mindsett platform for 40 venues providing real-time energy usage data

Q1 Launched programme of engagement with colleagues for Net Zero Pathway

Q2 Signed power purchase agreement in the UK

Q2 Completed six months of baseline data gathering at 40 venues

Q4 Completed Scope 1, 2 and 3 data gathering for Spanish operations



2024



Completion of Scope 3 data gathering for UK business

2025

Achieve net zero for Scope 1 and 2 and partial Scope 3 emissions



2035

2050

Achieve net zero emissions

Net Zero Pathway

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

A: Assessing consumption

Last year, we implemented new technology tools to capture facility energy usage data at source. Smart-sensing devices, PRISM, were installed at our 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 gaming machine through to the heating, ventilation and air conditioning ('HVAC'). We are also assessing this information alongside the metered gas data; this helps us understand the full picture of energy usage at each venue. We completed the baselining of data in FY2023.

The information captured can be accessed through Mindsett, either on an online energy usage dashboard or through the Mindsett app. The Mindsett 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. Each asset, whether that be a fridge or a PC, has its own data profile, and using this performance data we are able to predict potential faults. This allows the business to pivot from reactive maintenance to preventative, which in turn will mean more efficient energy usage and greater uptime of operational and revenue-producing assets.

UK and Spanish venues with smart-sensing technology installed

40

Assets' energy use being monitored in real-time

14,103

YOY reduction in energy use in venues with PRISM

12%

Categories of Scope 3 we are gathering data for

11

Net zero audits completed

10

Scope 1 and 2 emissions

For the rest of our UK portfolio and our venues in Spain, we utilised energy billing to understand our consumption in each venue. In the UK, alongside the asset level data collected using the PRISM technology, this has enabled us to build a complete picture of our Scope 1 and 2 emissions.

Similarly in Spain, gathering this baseline data has enabled us to begin scrutinising energy use, including comparison between venues, consideration of footfall against energy use, and investigating high usage. Summary reports are shared with our consultant in Spain to provide recommendations specific to each venue for reducing carbon emissions. We are now in the process of developing a decarbonisation plan for the Enracha business.

Scope 3 assessment

Scope 3 emissions are the largest and most complex area of most companies' carbon footprints. Gathering data on our Scope 3 sources is therefore critical to our long-term objectives. We have commenced a Scope 3 assessment of the UK business, supported by our carbon consultants. To establish the scope of the assessment, we held a workshop with representatives from across the Group and determined which of the 15 categories of Scope 3 were relevant to the Group considering the entire value chain.

Category 1: Purchased Goods and Services are likely to represent the greatest area of Scope 3 emissions. Through this assessment, we will be encouraging and supporting our value chain partners to understand their carbon footprints. We have included our commitments to this in our new Supplier Code of Conduct. We will be focusing on our largest suppliers based on spend for this initial assessment.

In Spain, as well as completing Scope 1 and 2 emissions baselining, we calculated our Scope 3 emissions for the nine venues and central office.

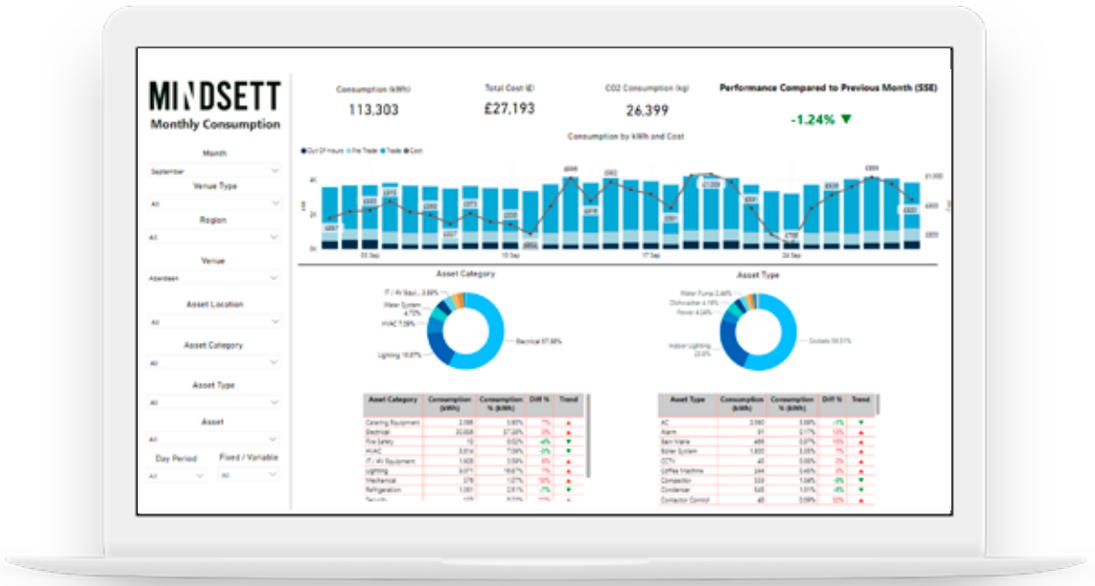
Net zero audits of venues

To ensure we have a holistic understanding of our emissions profile, we are conducting net zero audits of our venues. Through the data captured, we identified the 20 venues with the greatest opportunity for improvement.

A thorough survey of the first 10 sites reviewed energy efficiency including heating, cooling and ventilation systems and controls, building envelope (insulation, roofing, windows), lighting and small power, as well as an assessment of the opportunities for renewable energy. Net zero audits in the other 10 sites will be completed by the end of 2024/25.

Following each audit, a list of proposed initiatives was presented specific to the venue that considered the most effective means to reduce energy use and improve energy efficiency, as well as feasibility and reliance on the completion of other works.

Common themes included improvement in insulation and temperature controls, Cost estimates for infrastructure or equipment upgrades, as well as annual savings in energy use and cost, were also considered and presented to the business.



Net Zero Pathway

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

B: Investing in improvements

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

Lighting was a key source of energy consumption that we identified early on. Following the installation of LED lighting at 93 venues (41 Grosvenor and 52 Mecca), we took a sample size of 10 venues and, overall, they have saved 14% from the LED Project.

In October 2023, we signed a power purchase agreement (PPA). The agreement is for 2MW of baseload electricity (24 hours/day), which represents just under a third of our overall electricity usage for the UK based on the consumption during the year.

We are exploring options for self-generation and have carried out some high-level feasibility studies for six properties across the estate.

In the venues, the efficiency of heating and cooling systems is a key area of focus. We have replaced the gas heating systems with new split air conditioning/heat pumps in two venues, and, where appropriate, we are replacing boilers in venues.

In three venues we discovered that the overdoor heaters were being operated inefficiently; we visited the sites, raised the issue with the GMs and the engineers made recommendations for improvements.

In some cases, we identified that heating and cooling systems were working against each other; we have recommended a programme to ensure the system temperature controls are fit for purpose and the site teams are trained to use them.

Beyond our venues, we have started looking at how we can reduce Scope 3 emissions. The results of the assessments in both the UK and Spain will help to inform this strategy going forwards.

One Scope 3 category is employee travel; through our travel provider, when an individual books a trip, they now receive details on the carbon footprint of a journey, which helps them to make informed decisions about their travel.



Net Zero Pathway

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What have we done to progress on our Net Zero Pathway?
C: Engaging colleagues

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

We created a cultural and behavioural strategy, through which there are multiple touchpoints for our colleagues to engage with the Net Zero Pathway.

Rank Planet Champions ('RPCs')
We appointed an RPC in every venue across the UK to drive our environmental initiatives at their sites and support the General Managers ('GMs') in achieving energy consumption reductions.

Mindsett app
As well as using the Mindsett dashboard, the Mindsett app provides a readily accessible way for the GMs and RPCs to monitor energy use at their sites. The app has real-time data and sends reminders if it detects equipment has not been switched off.

Rank Planet Hub
We launched an intranet page which acts as a hub of information for colleagues, including tips on how to reduce energy usage, updates on our Net Zero Pathway progress and news about upcoming initiatives.

Newsletters
Rank Planet newsletters are sent out quarterly to employees to ensure that environmental matters remain a priority for everyone.

Survey
Surveys are conducted annually to understand employees' priorities and results shared with the RPCs. We conducted our second survey in April 2024; 52% of respondents said the Rank Planet programme had inspired them to make more environmentally friendly choices at work, and 72% stated they now understand energy consumption and what action they could take at work to make reductions.

League table
Our Mindsett venue league table shows which sites are leading on reducing their energy use, with the monthly winning venues being announced during the Town Hall meetings.

Making contact
We reach out to any GMs that have not engaged with the Mindsett platform to offer support and encourage interaction, and we also contact the venues when we spot any anomalies in their data.

Social media
We provide updates on our progress through our social media channels focusing on different aspects of our environmental initiatives.

Online training
Through our online training platform, we have also included an Environmental Sustainability training module for employees to complete.



Tracking engagement with the Mindsett platform across the month of September (see graph below), we found a correlation between the number of times a venue accessed its energy dashboard and the reduction in energy use.

This demonstrates that an actively involved GM can enhance energy and cost savings, increasing from 3.92% to more than double that with just 15 views.

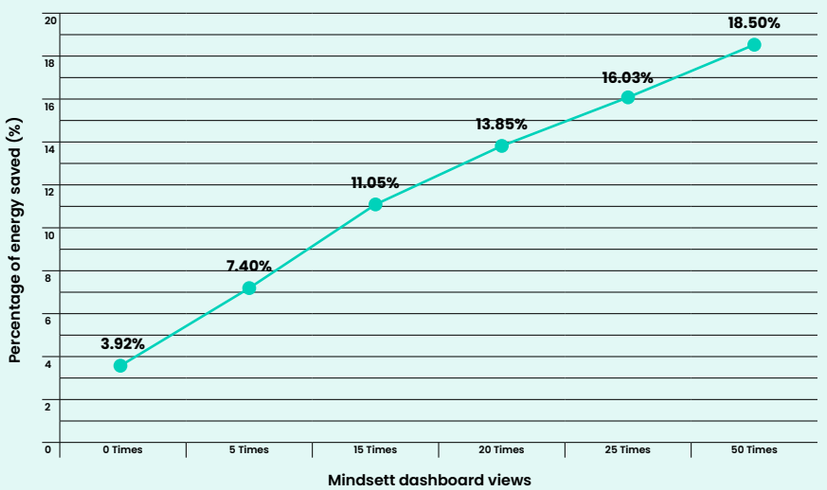
Based upon the data gathered, we have designed a number of initiatives to most effectively improve energy efficiency across the UK estate.

Utilise your tools
Following the implementation of the Mindsett dashboard, we wanted to encourage the GMs to engage with the platform. The 'Utilise your tools' initiative encouraged GMs to use the dashboard to identify assets using the most energy and work with their colleagues to change behaviours to make energy savings. The GM who accessed the dashboard the most was awarded a prize.

Lighting initiative
The lighting initiative was rolled out to all 40 venues with PRISM installed, focusing on energy use through lights and advice on how to reduce consumption. Within the first few weeks of the initiative launching, we observed a 5% reduction on average in energy use across the 40 venues. The venue with the highest reduction across the first three months was awarded a £100 voucher.

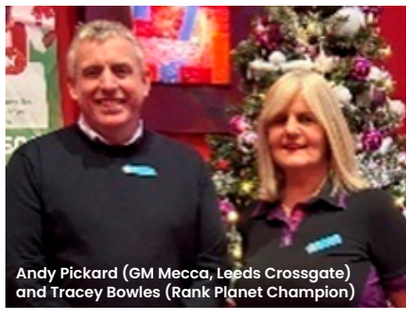
Energy MindSweep
The RPCs were tasked with looking at ways energy can be saved. A selection of venues were surveyed, and the key issues identified by the site teams were summarised and will be shared as part of the next quarterly newsletter.

How much venues save in % energy during September when using the Mindsett dashboard



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Case study
Initiatives in action



Andy Pickard (GM Mecca, Leeds Crossgate) and Tracey Bowles (Rank Planet Champion)

Average amount of energy Mecca, Leeds Crossgate's winning GM and team managed to save

23%

Net zero audit
Grosvenor, London The Victoria

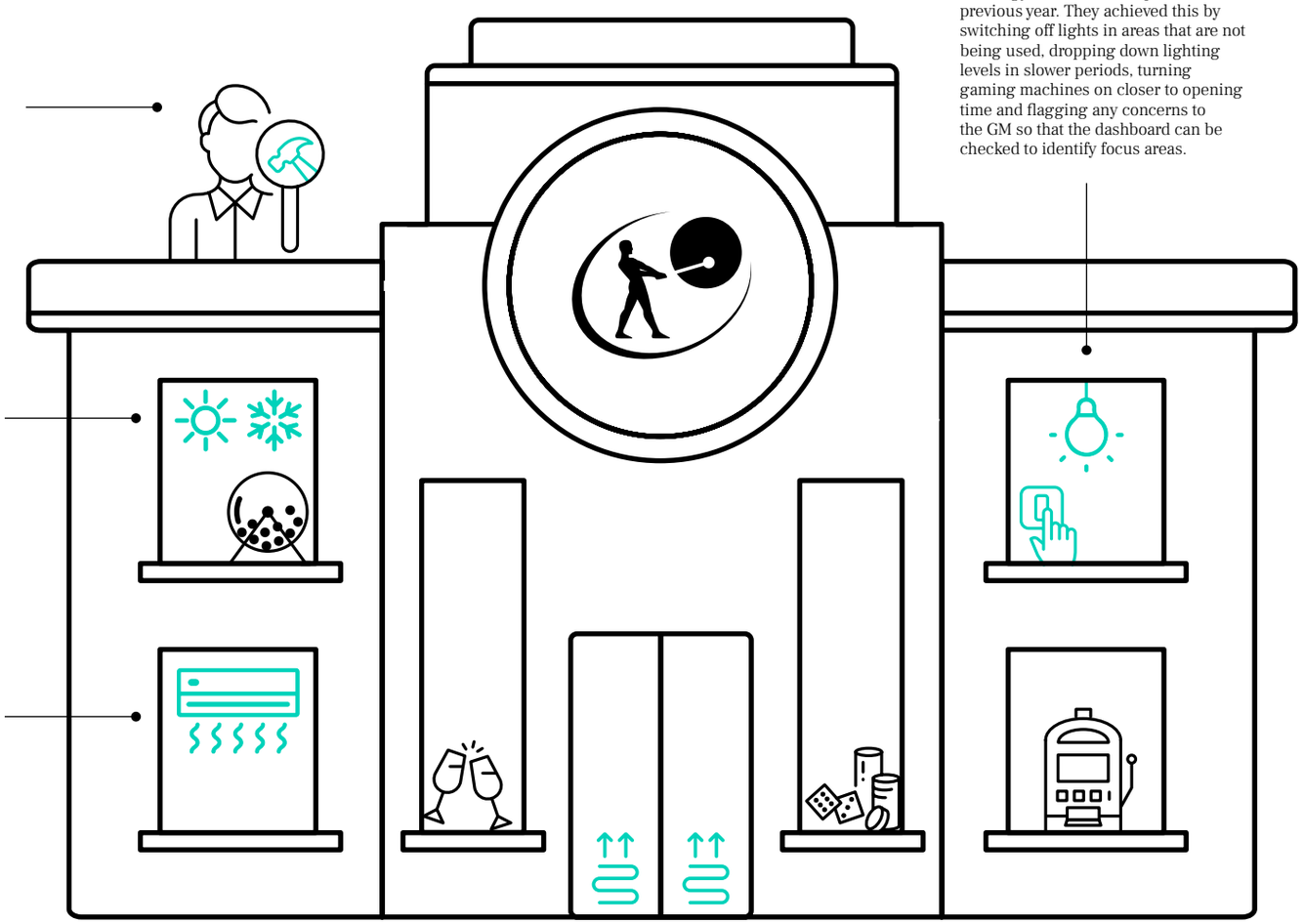
Through the Mindsett platform, we identified that the Vic was one of three venues showing demonstratively higher overdoor heater consumption than the rest of the estate. Thermal imaging found that the overdoor heater was performing poorly and most of the heat was being lost through the glazing. By installing a radiant heater located in the reception area, we have significantly improved the employee experience whilst there has been no discernible impact on the customer when they pass through the main doors.

Replacing equipment
Mecca, Hamilton

At our Hamilton venue, we identified that both the chiller and the boiler needed replacing, and completed these upgrades during the year.

Electrifying heating systems
Grosvenor, Nottingham and Grosvenor, Bournemouth

At two venues, we have replaced the gas systems and installed new split air conditioning/heat pumps.



Driving behavioural change
Mecca, Leeds Crossgate

Our 'Utilise your tools' initiative aimed to get GMs engaged with the Mindsett platform. By accessing the dashboard 186 times and using the information to see where they could make savings, Leeds Crossgate's winning GM and team managed to save 22.9% (average) of energy from the same quarter in the previous year. They achieved this by switching off lights in areas that are not being used, dropping down lighting levels in slower periods, turning gaming machines on closer to opening time and flagging any concerns to the GM so that the dashboard can be checked to identify focus areas.

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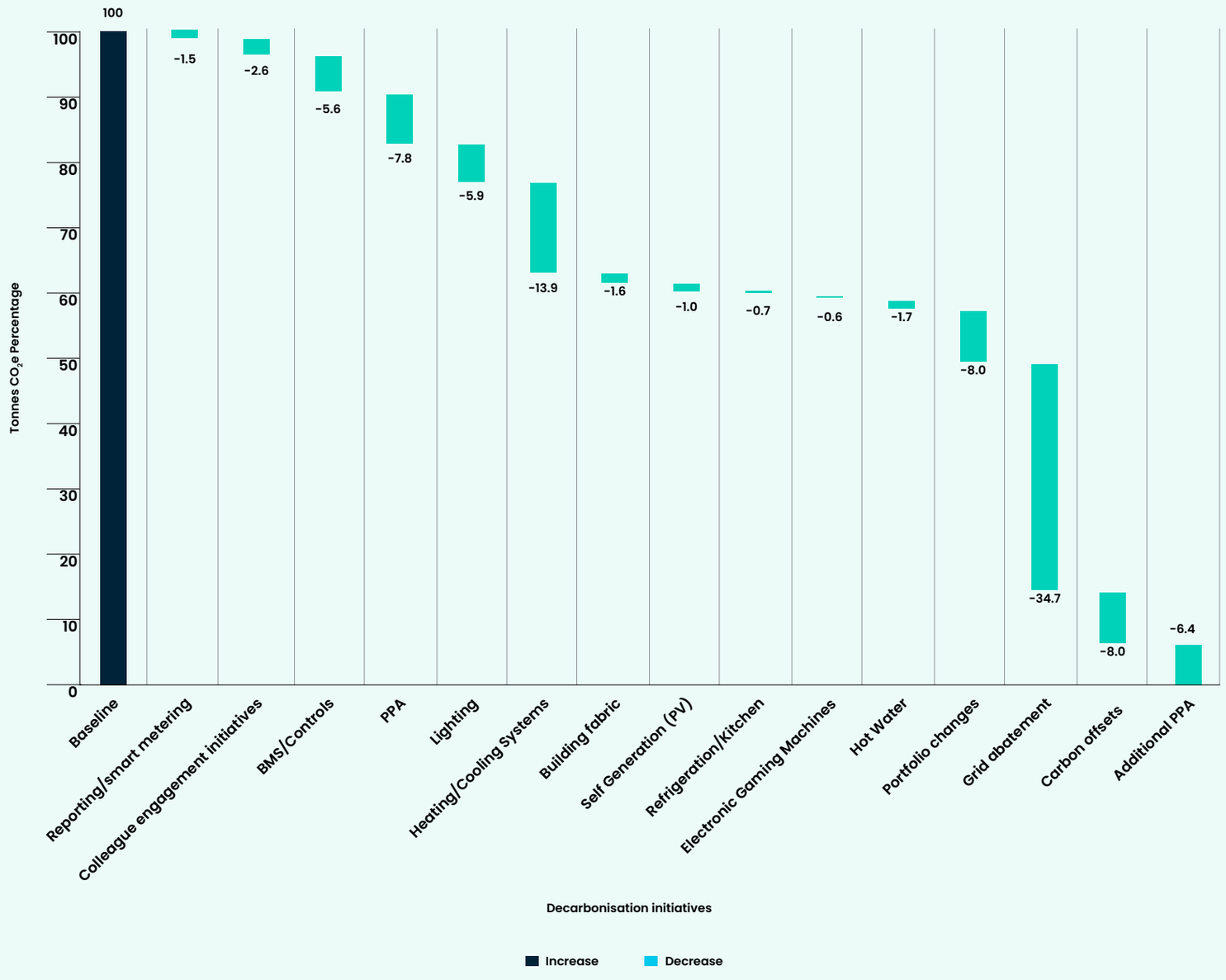
Net Zero Pathway

What are our next steps?
Having completed the initial energy assessments, we are using the data to continue evaluating energy usage, launching colleague initiatives and implementing equipment improvements or replacements that improve energy efficiency and reduce consumption.

As we implement further decarbonisation initiatives, we continually assess our progress. The chart below represents our carbon footprint at the end of 2023/24, and the emissions reduction programmes planned to take us to net zero emissions by 2050.

The updating of our net zero waterfall chart is an iterative process; we take into account everything actioned to date, ensure that measures are still in the correct order to be most effective, and adjust the plan accordingly.

Net zero waterfall



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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 apprised of climate-risk considerations, including progress against our net zero targets and ESG KPIs. Specifically, the ESG Steering Group, which assumes executive ownership and accountability for the sustainability strategy, provide updates to the Board; this year, this included progress on the Net Zero Pathway and the double materiality assessment, and updates on the legislative landscape for climate reporting.

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

The terms of reference for the Committee are available on our website; their responsibilities regarding ESG includes climate-related matters. The Chair of the ESG & Safer Gambling Committee, Katie McAlister, a non-executive director on Rank's Board of Directors, is responsible for oversight of all ESG matters including climate change.

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

In addition to receiving internal information, the Board is given updates by our external consultants. This year the ESG & Safer Gambling Committee received a presentation from our ESG specialists on the evolving ESG reporting landscape, including how TCFD reporting is being integrated into the new reporting requirements.





Assessment of climate risk

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. This Group Risk Register is also informed by the risk registers held at business unit level from Mecca, Grosvenor, Enracha and our digital businesses.

As part of the business' first double materiality assessment conducted this year, the business assessed the materiality of 'Emissions management and climate change adaptation'. Externally, the release of GHG emissions to the atmosphere as a result of the Group's operations and across the value chain, was identified as having a material impact in the short-term. Nevertheless, this is mitigated by the development and implementation of our Net Zero Pathway, which should reduce the impact materiality of this issue over the medium to long term.

Internally, the climate-related expectations of our stakeholders were identified as having a material impact on the business financially. This is as a result of our commitment to spending £56.7m over the next twelve years on our Net Zero Pathway. However, this expenditure will reduce the financial materiality of the issue over the medium to long term as we reduce our carbon emissions footprint through the infrastructure, equipment and environmental management systems invested into in the short term.

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

Further climate-related risks were identified as having potential impact upon the business. However, the assessment concluded that these risks were of insignificant financial materiality over the short, medium and long term.

Climate risk in decision-making

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

A significant component of the annual budget is the continued investment into our real estate; during the course of the year this has included replacement of gas heating systems with new split air conditioning/ heat pumps in two venues, replacement of boilers, installation of LED lighting, and signing a power purchase agreement which represents under a third of our energy consumption in the UK based on the year just ended.

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

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

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

Management oversight

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

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

ESG Steering Group ('ESG-SG')

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

The ESG Working Group ('ESG-WG')

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

The Net Zero Working Group ('NZWG')

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

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

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

In Spain, we have similarly engaged consultants to support on net zero workstreams: JustaEnergia and Valora. The business is informed by other corporate advisors. These include broking, legal and accounting professionals, with information delivered via webinars, publications, one-to-one training sessions, and ongoing internal discussions regarding energy utilisation.

Considerations from multiple segments of the business feed into our assessment of climate-related risks and opportunities, as these risks can impact the business in many different ways. For the Group's balance sheet, climate-related risk has the potential to impact financial performance and cost base.

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.

Strategy

The NZWG is defining a comprehensive decarbonisation and investment strategy across the UK portfolio, and the development of a decarbonisation plan for Spain is also underway. These investments will support the Group's stated ambitions, and the upfront capex should positively impact the long-term opex requirement, with the introduction of more energy-efficient and cost-effective solutions. The inclusion of climate assessment criteria into the project approval process for all areas of the business further integrates climate-risk consideration into our operations.

As set out in our Net Zero Pathway (see page 48), Rank has committed to £56.7m[1] investment in climate-related and aligned initiatives over the next 12 years within the UK. (It is important to note that this will include expenditure that is a matter of course for maintenance, but that will contribute to the reduction of the business' carbon footprint.) The investment made each year is dependent on the initiatives we are able to complete. During the course of this year, £8.65m of the allocated budget was invested in net zero actions.

Rank takes into consideration the useful life of the organisation's assets or infrastructure and the fact that climate-related issues often manifest themselves over the medium and longer terms. This year, Rank's accounting team reassessed the climate-related matters that may impact the Group's financial statements.

1. This was adjusted from £57m due to changes in anticipated prices for areas that we plan to invest in to reduce emissions.

Findings of assessment of climate-related matters on Group's financial statements

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

YOY reduction in energy use in UK venues

12%

Cost saving due to reduction in energy use in UK venues

£1.4m



LED lighting refurbishment, Enracha, Universal

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

Climate-related risks and opportunities

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

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

Transition Risks

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

Transition Risks

Risk description	Potential outcomes	Financial impact
Policy and Legislation		
That Rank is not able to respond to increasingly stringent regulation on reporting to the frequency or quality required, resulting in legal and/or reputational issues, which in turn drive compliance costs and potentially impact the cost of capital.	Monitoring potential legislative and regulatory changes. Reporting against the recommendations of the Task Force on Climate-related Financial Disclosures ('TCFD'). Reported to the CDP.	Across the short, medium and long term we consider this risk to be of insignificant financial materiality as we are reporting against internationally recognised frameworks, and we are currently developing our disclosure ready to meet new legislative requirements for sustainability reporting.
That nation states may introduce carbon emission levies, placing an additional fee upon energy consumption costs, which may increase Rank's operating costs.	Continue to monitor for potential carbon emissions levies.	We consider this risk to have insignificant financial materiality across the short, medium and long terms, as the implementation of our Net Zero Pathway will reduce our emissions.
Market		
Climate-induced changes to customer preferences for leisure, such as more players choosing to play online at home, rather than incur possible transportation emissions and continued utilisation of inefficient spaces.	Continue to monitor customer behaviours. Offer cross-channel platforms for customers.	We do not assess this risk as being highly likely, and therefore consider its financial materiality insignificant. Furthermore, our cross-channel offering means that if customers were increasingly moving online, we could adapt our experience to suit their expectations.
Reputational		
Failure to meet internal or external stakeholder climate-related expectations, thereby impacting relations. May result in being perceived a higher risk investment, increasing cost of capital with investors, financial institutions and insurers. May be reduced revenues due to challenges in attracting new talent and increased opex from employee turnover.	Development and implementation of our Net Zero Pathway. Interim target for 2035 to be net zero for Scope 1 and 2 and selected Scope 3, and then target for net zero for all emissions by 2050.	We have committed to spending £56.7m over the next 12 years to support our net zero ambitions. While this comprises a major financial impact in the short term on cash flows, this will decrease to a moderate financial impact over the medium to long term, as we reduce our emissions over time and aim to be net zero on Scope 1 and 2 and selected Scope 3 by 2035.

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Physical Risks

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

Flood risk assessment

We once again completed a desktop assessment to review the perceived flood risk of our UK operations (both venue and office locations) and international operations (including all Enracha venues and the offices in Spain, Gibraltar, South Africa and Mauritius). 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').

Of the 108 venues and offices in the UK, only 13 were identified as high risk for urban/surface water, river and/or coastal flooding. Of the 13 international venues and offices assessed, only one (an Enracha venue in Spain) was identified as being at risk of urban/surface water, river and/or coastal flooding. Currently, we believe there is little to no impact from the physical risk presented in Spain on our financial performance.

All our venues are insured in the event of flooding. While flooding would impact our performance as clubs would have to shut, given the low likelihood of this occurring, we considering this of insignificant financial materiality to the business. 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.

Physical Risks

Risk description	Potential outcomes	Financial impact
Acute		
Extreme weather events as a result of climate change could cause damage to our properties and vehicles which will incur increased capex and insurance costs. Impacts of supply chain disruption from increased severity of extreme weather events may impact opex and capex, or impact revenue if customer demands for online entertainment cannot be met.	Business continuity and crisis management plans in place.	Extreme weather events would impact our performance if a club were shut, and as a result, our cash flows. However, all our venues are insured, and we also consider this to be of low likelihood; it is therefore considered of insignificant financial materiality across the short, medium and long term.
Chronic		
Changes in average climate conditions, including rising sea levels, coastal flooding and increased average temperatures, could increase opex driven by increased use of climate control systems, as well as maintenance and insurance costs.	Continue to monitor flood risk at all Enracha, Grosvenor and Mecca venues. Clubs are insured in event of a flood.	Flooding would impact our performance and cash flows if a club were shut. However, all our venues are insured, and we also consider this to be of low likelihood; it is therefore considered of insignificant financial materiality across the short, medium and long term.

Flood risk assessment for UK and Spanish venues

UK venues & offices	Surface water	Rivers	Coastal
High risk	10.2%	1.9%	1.9%
Medium risk	13.0%	5.6%	4.6%
International venues & offices	Surface water	Rivers	Coastal
High risk	0%	7.7%	7.7%
Medium risk	7.7%	7.7%	7.7%

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

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Scenario analysis

To evaluate the resiliency of the Group's strategies to climate-related risks and opportunities, we conducted an analysis on two different possible scenarios: the rise in global temperature is limited to less than two degrees, or the global temperature rises by more than two degrees.

The risks and opportunities to the Group under each scenario are presented below against short, medium and long-term time horizons.

<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 (< 1 year)
Higher transition risks associated with moving to a low-carbon economy.
Compliance risk if we fail to meet regulatory requirements, including emissions reporting obligations.
Reputational risk with investors, customers and employees, if we do not adequately address climate change.
Increased cost of climate-related levies/increased pricing of greenhouse gas (GHG) emissions.
Medium term (1-5 years)
Continued transition risks
Continuing compliance risk if we fail to meet regulatory requirements, including emissions reporting obligations.
Increasing reputational risk with investors, customers and employees, if we do not adequately address climate change.
Increased cost of climate-related levies/increased pricing of GHG emissions.
Changing customer behaviour.
Long term (> 5 years)
Less significant increase in physical risks Continued isolated extreme weather events causing manageable direct business disruptions to office locations, and impacts to suppliers in our moderate supply chain.
Higher summer temperatures and rapid changes in temperature and humidity causing challenges for venue cooling, and increases in energy costs across our venues and offices.

Opportunities
Define net zero strategy to meet increasing stakeholder expectations.
Potential to develop a zero-emissions online product, or facility that allows customers to offset.
As demand for more energy-efficient infrastructure and equipment increases in the market, so demand will increase, which is likely to reduce costs. This will enable investment that will ultimately reduce energy costs.

>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 (< 1 year)
Slight increase in transition and physical risks in the short term
Isolated and manageable business disruptions caused by extreme weather events, such as flooding or drought.
Insurance costs rise in step with increase in physical damage to properties.
Ad-hoc supply chain interruptions.
Medium term (1-5 years)
Increasing physical risks due to a failure to adequately transition to a low-carbon economy
Increase in energy costs as traditional energy sources become more constrained, 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 (> 5 years)
Increased physical risks due to a failure to adequately transition to a low-carbon economy.
Increase in energy costs.
Flooding at certain high-risk venues due to increased sea level.

Opportunities
Identify higher-risk properties within the portfolio to either invest in or to consider exiting to stave off future reparation and increase in insurance 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 Net Zero Pathway mean we are mitigating risk in this area.

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

Risk management

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

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

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

Financial materiality was considered against Operating Profit and classified as insignificant, minor, moderate, major or severe, and whether that impact was upon cash flows, development, performance, position, cost of capital, or access to finance.

Each risk was considered across the short-, medium- and long-term time horizons, which we define as the following: short, <1 year; medium, 1 to 5 years; and long,> 5 years (please note: we have updated the time horizons to reflect those which we used in the double materiality assessment, guided by the CSRD). The collated results of the double materiality assessment were presented to the Executive for consideration and approval.

Please see the double materiality assessment report on pages 09 to 11 for a complete understanding of the process.

Responsibility for mitigating, transferring, accepting or controlling climate-related risks sits with the NZWG and its chair, Director of IR, ESG and Treasury. The judgements made are related to the ESG Steering Group and ESG & Safer Gambling Committee for oversight and approval.

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

Our real estate portfolio is the most material carbon hotspot within the Scope 1 and 2 value chain. Consequently, this has been designated the primary area of focus for the NZWG, through the application of technology within the top 40 most carbon intensive sites (which comprise over 50% of the Group's carbon profile). Having collected six months' worth of data assessing energy use and efficiency of equipment, we have identified improvement opportunities and commenced a programme of investment into our venues.

We have undertaken a Scope 3 assessment process across the UK business, establishing a baseline for Scope 3 emissions data in the current year.

Our intention is to report our Scope 3 emissions (across the 11 categories that we have determined to be relevant to the Group considering the entire value chain) in the coming years in accordance with our commitment to have an SBTi-aligned plan.

For more details on the Scope 3 assessment, see page 49.

To align with the Group net zero target, we are developing a specific Net Zero strategy for the Spanish portfolio, and have completed an energy assessment of the land-based venues.

The implementation of our Net Zero Pathway is being delivered through three interrelated workstreams: carbon reporting, transformation (PMO and designing investment plan), and cultural and behavioural change (see the Net Zero Pathway section for more details on initiatives completed and commenced to date).

Metrics and targets

We have set two net zero targets in line with our decarbonisation ambitions. We aim to be net zero by 2050, 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 emission and specific Scope 3 elements in the Group for 2035.

Our targets are based around clear workstreams for decarbonisation of operations, as part of our Net Zero Pathway. Foremost, following an extensive energy assessment in our 40 highest-energy-consuming venues in the UK, we established a clear baseline for energy use. This has informed a raft of initiatives that include building rationalisation, grid abatement, PPA supply and various other energy reduction measures including colleague engagement initiatives, the implementation of which has already begun.

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

Furthermore, we have commenced a Scope 3 emissions assessment, which will further inform the initiatives under our Net Zero Pathway.

For more details on our Net Zero Pathway, please see pages 47 to 53.

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 2023/24 was £734.4m, with a carbon intensity ratio of 30.1 tCO_2e per £m NGR (for 2022/23 it was 36.6).

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



LED lighting refurbishment, Grosvenor, Luton

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

SECR report

Objectives of this report

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

Scope boundaries

The Rank Group Plc has used an operational control approach to define its GHG emissions boundary, as it has full authority to introduce and implement its operating policies at its operations. Rank is reporting at Group level and therefore must take into account not only its 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 its 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 has chosen to also voluntarily report on emissions resulting from electricity transmission and distribution losses, air travel, rail travel, water 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 2023 to June 2024, which is in line with the Group's financial reporting period.

Supporting materials

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 bill validation.

For supplies where complete 12 month energy usage was unavailable, flat profile estimation techniques were used to complete the annual consumption. Transport mileage and/or fuel usage data was provided for company and employee owned/leased vehicles.

For business travel in employee owned vehicles where the employee is reimbursed for the mileage travelled, there is limited information available. Therefore, conversion factors for an average vehicle with an unknown fuel type have been used. 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 kWh

Emission Source

Energy Type	2023/24 kWh	2022/23 kWh	% of 2023/2024 total	Change +/-
Gas	56,223,131	58,804,557	47.2%	-4.4%
Electricity	54,378,618	60,963,974	48.9%	-10.8%
Business Travel	3,902,842	4,849,493	3.9%	-19.5%
Total	**114,504,591**	**124,618,024**	**100.0%**	**-8.1%**
Total using market-based Scope 2 emissions	**101,352,591**			

UK Group Position kWh

Emission Source

Energy Type	2023/24 kWh	2022/23 kWh	% of 2023/2024 total	Change +/-
Gas	55,675,893	58,242,617	48.5%	-4.4%
Electricity	50,355,849	57,009,987	47.5%	-11.7%
Company Travel	3,902,842	4,849,493	4.0%	-19.5%
Total	**109,934,585**	**120,102,096**	**100.0%**	**-8.5%**

Spain Group Position kWh

Emission Source

Energy Type	2023/24 kWh	2022/23 kWh	% of 2023/2024 total	Change +/-
Gas	547,238	561,940	12.4%	-2.6%
Electricity	4,022,769	3,953,987	87.6%	1.7%
Total	**4,570,007**	**4,515,927**	**100.0%**	**1.2%**

GHG Emissions Summary

Emission Source

Energy Type	2023/24 tCO_2e	2023/24 %	2022/23 tCO_2e	2022/23 %
Gas (Scope 1)	10,290	41.4%	10,734	43.2%
Company Transport (Scope 1)	378	1.5%	142	0.6%
Employee Transport (Scope 3)	343	1.4%	599	2.4%
F-Gases (Scope 1)	620	2.5%	153	0.6%
Electricity Location Based (Scope 2)	11,086	44.6%	11,631	46.8%
Electricity Market Based (Scope 2)*	*7,704*	-	-	-
Transmission & Losses (Scope 3)	974	3.9%	1,078	4.3%
Air Travel (Scope 3)	892	3.6%	433	1.7%
Rail Travel (Scope 3)	47	0.2%	-	0.0%
Waste (Scope 3)	169	0.7%	82	0.3%
Water (Scope 3)	35	0.1%	-	0.0%
Total	**24,835**	**100%**	**24,852**	**100.0%**

*In the period covered by the report we purchased 13,152,000kWhs of renewable energy via a long-term Power Purchase Agreement, and this has been reflected in the calculations for the market-based emissions for Scope 2.

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

Emission Source		
Energy Type	**2023/24**	**2022/23**
Scope 1 (mandatory)	11,288	11,029
Scope 2 (mandatory - location-based)	11,086	11,631
Scope 2 (market-based)	7,704	-
Scope 3 (mandatory)	343	599
Mandatory Total	22,717	23,259
Scope 3 (optional)	2,118	1,594
Total	**24,835**	**24,853**
Total using market-based Scope 2 emissions	**22,112**	**-**

Emission By Country

Emission Source			
Energy Type	**UK**	**Spain**	**Total**
Gas (Scope 1)	10,189	101	10,290
Company Transport (Scope 1)	378	-	378
Employee Transport (Scope 3)	343	-	343
F-Gases (Scope 1)	620	-	620
Electricity (Scope 2)	10,427	659	11,086
Transmission & Losses (Scope 3)	902	72	974
Air Travel (Scope 3)	892	-	892
Rail Travel (Scope 3)	47	-	47
Waste (Scope 3)	169	-	169
Water (Scope 3)	35	-	35
Total	**24,003**	**832**	**24,835**

Pillar	Recommendation	Location	Consistency statement 2023/24	Intention
Governance	a. Describe the Board's oversight of climate-related risks and opportunities.	Page 54	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.	Page 55	Consistent	Continue to communicate the progress of the Net Zero strategy development up to the Board.
Strategy	a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term.	Pages 56 to 58	Consistent	Continue to monitor relevant climate-related risks and opportunities over our defined time horizons.
	b. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	Pages 55 to 58	Consistent	Continue to make informed decisions in investing in decarbonisation initiatives.
	c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Page 58	Consistent	Continue to monitor the resilience of our strategy under climate-related scenarios.
Risk management	a. Describe the organisation's processes for identifying and assessing climate-related risks.	Page 59	Consistent	Continue to monitor the financial materiality of climate-related risks through our double materiality process.
	b. Describe the organisation's processes for managing climate-related risks.	Page 59	Consistent	Continue to progress on our Net Zero Pathway.
	c. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	Page 59	Consistent	To review our double materiality process which is informed by the risk register.
Metrics and targets	a. Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	Pages 59 to 61	Consistent	Continue to disclose positive economic and environmental impact metrics. We have included the YOY reduction in energy use in UK venues and the related cost savings for the business.
	b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas emissions and the related risks.	Pages 60 to 61	Consistent	To complete the Scope 3 emissions assessment.
	c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	Page 59	Consistent	Continue to progress the decarbonisation efforts that will enable us to have an SBTi-aligned net zero plan in the coming years. The process for alignment is up to two years based on current market knowledge, and we will provide an update in due course.

Communities

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64	Enabling our colleagues to give back
65	Partnership with Carers Trust



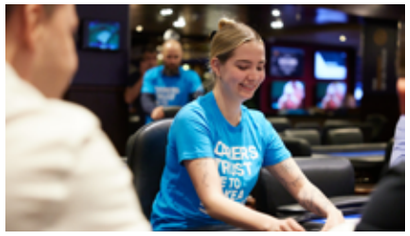
Total charitable funds raised

£323k

Delivered on a calendar of events to raise funds for our Group-wide charity partner, Carers Trust, and celebrated the 10-year anniversary of this partnership, during which we have raised over £3.7m for this deserving charity.

Supporting local people in the communities we operate in by creating employment opportunities and promoting job vacancies through job centres and other local bodies.

Raised over £58,000 in donations for over 60 local causes.



Beyond entertaining people, we recognise that we play a pivotal role in the communities in which we operate. Our venues often serve as a social hub, and our Mecca venues, in particular, are a key place for interaction amongst our older cohort of customers.

We want to give back to local communities and support colleagues in doing the same, and have therefore developed a community strategy. The three focus areas are Employment, Outreach and Charity Fundraising.

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.

"My visit was absolutely amazing – I have been isolated in my house for weeks due to a health condition and my daughter and son took me to bingo which I haven't been to for years. The music playing as I entered was sensational, staff were wonderful, food was immaculate – this was the best day of my life!"

"I went to bingo alone but I never felt alone and had a fantastic evening. The reason I'm writing this is really to say thank you for creating a safe environment where we can relax and enjoy good company and meet new friends from my community."





Actively recruiting from local communities

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An important avenue for supporting local people is by creating employment opportunities. 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 have continued to work with the Department for Work and Pensions ('DWP'), affiliated schemes, and other bodies that specialise in ensuring there are work opportunities for all in local communities.

We 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 to support talent development in the wider hospitality sector.

Charities and small businesses in our industry can apply to Rank to receive a portion of the funding to use for training their own employees.

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



Mecca, Luton

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Enabling our colleagues to give back

Our colleagues are truly embedded in the communities in which we operate and welcome the opportunity to give back.

They continue to volunteer for charities, organise fundraising initiatives and donate to causes important to their communities, and we are very proud of the work they have done over the course of the year.

To enable colleagues to make a material difference to causes that matter to them we will be launching a new global Volunteering Policy. We are also in the process of developing a new community strategy that will further support colleagues in giving time for volunteering initiatives.

Throughout the year, our venues have supported over 60 different charities and local initiatives. From hosting bingo nights and coffee mornings, doing sponsored walks and runs, to cake sales and staff Christmas pyjama days, our colleagues raised over £58,000 to donate to all manner of causes in their communities.

I go to Mecca once at the weekend as I enjoy the company of other players and have made a lot of friends. It's not the winning that matters although it's a bonus – but just the friendly atmosphere.

I come here on my own, but I usually meet a friend here... if it wasn't for bingo, I'd be sat at home.

Case study
Fundraising at our clubs

Over the course of the year, our colleagues at Mecca Wrexham have raised over £11k for local charities.

Customers in the venue have the opportunity to vote for the local charities that the team support. Charity activities this year included donating over 110 Christmas hampers for local people in need and delivering Easter eggs for those that are housebound in the community.

In Hull, our venue colleagues raised an impressive £8,405 for Hull Tourette's Society, Rainbows Charity and Cash for Kids, through charity flyer and bucket collections. Colleagues in Swansea also had a brilliant year, raising over £10,000 through charity nights in the venue, customer fun days and a midnight walk.

It was fantastic to hear about all the events taking place in our Wrexham venue. This effort has been spearheaded by one of our team members, Tiffany, who has been overseeing fundraising activities. The venue has also become the home of many of the local darts teams (over 18s only!) with matches taking place in the lounge bar area most nights of the week. It is a super club with a real spirit.

John O'Reilly
Chief Executive







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Partnership with Carers Trust

We partnered with Carers Trust in 2014, establishing a UK-wide commitment to raise funds for the charity. The charity works to improve services, support and recognition for unpaid carers.

Every year our colleagues take part in a variety of events and challenges in order to fundraise for carers, and this year our colleagues have done everything from climbing mountains and hosting charity casino nights, to shaving their hair and getting slimed.

Through Rank Cares Grants, we have continued to award grants to 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 the impact of our fundraising and the importance of supporting carers.

In each venue and office we have Rank Cares Champions, either individuals or teams, that take responsibility for making colleagues aware of events scheduled and encouraging everyone to get involved in the fundraising initiatives. They will also introduce new team members to what Carers Trust does and how we support the charity.

This year we were proud to celebrate the 10-year anniversary of our partnership with Carers Trust. Since the start of the partnership, the Group has raised £3,799,897 for Carers Trust, supporting over 14,161 carers. We look forward to continuing to work with the charity and raising funds for such an important cause.

Amount raised for Carers Trust this year

£323k

Number of carers supported this year

546

Rank Cares | CARERS TRUST





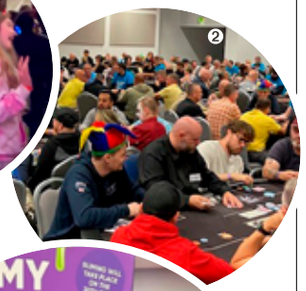
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Partnership with Carers Trust
A year of events and fundraising

2023

August
1 506 young carers attended the Scottish Young Carers Festival from across the UK. The Grosvenor team supported by supplying the silent disco for the festival and, helped by suppliers, were able to supply all the snacks and treats for the three days.

2 Goliath – Jokers Wild does Carers Trust poker event was held in Grosvenor Coventry and over £5k was raised.

September
3 Mecca venues held a Slimy September fundraising event with all venues taking part in the fun. Over the course of the month, customers voted for who they would like to see slimed and donating money – £13k was raised throughout the month!



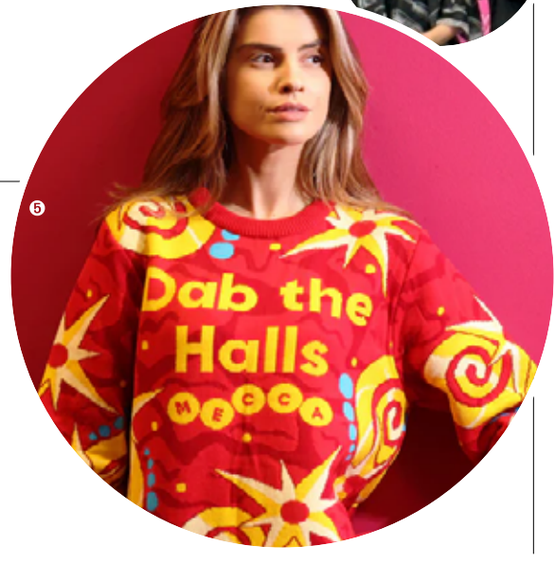

November
Our Chief People Officer and Group Transformation Strategy Director attended a Grants Panel for Carers Trust.

4 Donna from Mecca Hartlepool was 'Braving the Shave' when she shaved her hair off, raising £1,768 split between Carers Trust and a local hospice, Alice House.



December
5 Mecca hosted a Christmas Jumper Weekend and raised £4k.

Carers Trust and Rank announce hitting £3.5m fundraising target!



2024

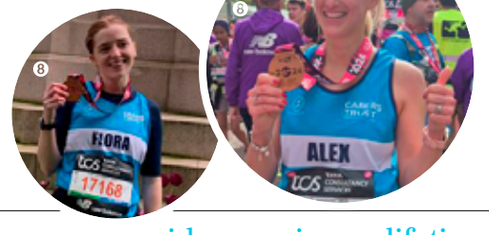
February
6 This year, Rank was nominated for two awards at the European Casino Awards. We were thrilled to win the Corporate Community Engagement Award for the second year running.



March
7 For Young Carers Action Day, Rank raised awareness on LinkedIn, asking people to sign the Young Carers Covenant. There are over one million young carers and young adult carers in the UK and this commitment details the 10 outcomes that will protect their futures. See more



April
8 TCS London Marathon saw two of our colleagues take on the 26.2 miles. Flora from Sheffield support offices and Alex from Grosvenor Leeds raised an incredible £4k between them.



"Three in five of us are likely to become unpaid carers in our lifetime, having watched friends and family members care for their loved ones it is clear that their social lives, relationships and careers are often sacrificed in order to do so. I am excited to take on this challenge whilst raising all-important funds to help improve the support available to unpaid carers."

Flora
Sheffield office

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Partnership with Carers Trust
A year of events and fundraising

2024

May
Rank hosted the final of the Bartender of the Year at Grosvenor Reading South, with Merlin from First Dates being one of the judges. £1 from every winning cocktail sold was donated straight to Carers Trust.

❶ Twenty Rank colleagues from across Mecca, Grosvenor and the support offices took on the Three Peaks Challenge, climbing Ben Nevis, Scafell Pike and Snowdon in just 24 hours. Their target was £30k which equated to £1,500 each – they managed to raise a fantastic £32,469.57 which will all go towards carers grants.





June
❷ We hosted our annual City Poker Event at the Vic in London, raising over £3k.

❸ A team from Grosvenor Dundee took on the three Munros raising £1k for Carers Trust.

❹ During Carers Week, Grosvenor Casino Huddersfield offered their venue for free for those hosting an event to mark Carer Support Services Day. Carers from Mid-Yorkshire Carers Centre were invited in for talks and advice and refreshments on the day.

❺ Rank and Carers Trust marked the 10-year anniversary of their partnership with fundraising activities across the business including a raffle and fun casino.









"I'm doing this to help support carers because for society carers are vital, and one day there may become a time I would need to rely on a carer! By doing this I hope to help raise funds so unpaid carers can continue to help people."

Jason
Grosvenor Walsall, member of the Three Peaks Challenge team

"Carers Trust is a great charity that supports unpaid carers across the UK. My mum cared for both of her elderly parents over a 10-year period and the impact on her was significant. The Three Peaks Challenge is a great endurance challenge and the perfect opportunity to raise money for carers that need important help and support."

Richard Harris
Chief Financial Officer

"We're delighted that our partnership with Rank is marking its 10-year anniversary. Rank's long-term support over the past decade has been transformational for our work with unpaid family carers, the army of people of all ages supporting loved ones with disabilities and health conditions. Many have been plunged into poverty by their caring role, so every grant made possible by Rank funding can make a massive difference to their lives. This has become even more urgent during the cost of living crisis. We're deeply grateful for the unwavering support of the team and customers at Rank, Grosvenor Casinos and Mecca Bingo – thank you for everything you have done and continue to do."

Kirsty McHugh
Carers Trust CEO

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Case study
Zoe's story

Zoe is one of the many carers who has benefitted from a Rank Cares grant. She spends up to 100 hours a week caring for her son Mackenzie, 15, who lives with ADHD and anxiety.

Managing his complex needs alongside her own life can be exhausting at times for Zoe.

A key symptom of Mackenzie's anxiety is his persistent worrying about cleanliness and hygiene, meaning he showers multiple times a day and needs his bedding and clothes washed very frequently.

With the help of her local carers centre, Carers Trust Cheshire & Warrington, Zoe was able to apply for and secure a Rank Cares grant, which meant she could finally buy a new tumble dryer.





> We had a tumble dryer given to us when we moved into the property, but it didn't last very long. So we've been having to dry washing on the doors and radiators, but I can't afford to have the heating on a lot. He kept putting the heating and electric fire on and it was just costing me too much.

> Everything was taking so long to dry, it ended up smelling damp, so I had to wash it all again.

> It's been a really, really big help. There are five of us in the house, and it's meant that I've been able to wash and dry everything so easily. Some people might think "it's just a tumble dryer" but oh, what a difference. I really do appreciate it, it meant a lot.

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The following tables include the KPIs and additional metrics that we use to measure our ESG-related performance.

Key Performance Indicators

Pillar	KPI	**2023/24**	2022/23	Notes
Customers	Customer Net Promoter Score ('NPS')	**52**	43	An average for last three months of the year and this Group score is a weighted average of all business units scored based on NGR % contributions.
	Employee NPS on safer gambling	**69**	53	Linked to executive remuneration.
	Customer feedback scores on safer gambling	**84%**	78%	An average for last three months of the year and this Group score is a weighted average of all business units scored based on NGR % contributions. Linked to executive remuneration.
	UK Digital customers using safer gambling tools	**31%**	30%	This is the total active customers that have used safer gambling tools during the year. Due to a change in the calculation methodology, the 2022/23 figure has been restated.
Colleagues	Employee Net Promoter Score ('eNPS')	**39**	14	Linked to executive remuneration.
	Percentage of women in senior roles	**34%**	35%	Position at 30 June 2024.
	Employee engagement score	**79%**		We will be using employee engagement score rather than eNPS as an indicator for colleague sentiment going forwards.
Environment	Absolute carbon emissions	**22,112 tCO_2e**	24,853 tCO_2e	This is calculated using Scope 2 market-based emissions. Previously we used carbon intensity ratio as the Environmental KPI. Linked to executive remuneration.
Communities	Total charitable funds raised	**£323k**	£283k	

Governance

Topic	Metrics	Unit of measure	**2023/24**	2022/23	2021/22
Anti-corruption	Number of hours per employee who undertook anti-money laundering training	Hours	**1.0**	1.9	0.2
	Total number of whistleblowing incidents reported and investigated	Number	**13**	12	8
	Total number of hours of staff training – Anti-corruption	Hours	**7,221.25**	Male: 6,742 Female: 6,075	Not reported
	Number of reported cases due to unethical behaviour or corruption	Number	**0**	0	Not reported
	Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	Number	**2**	0	Not reported
	Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	Number	**0**	0	Not reported
Industry engagement	Percentage of UK trade association meetings attended	Percentage	**100%**	100%	100%
	Contributions to consultations impacting Rank	Number	**16**	2	1
Compliance	Number of personal management licence holders	Number	**539**	543	501

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Customers

Topic	Metrics	Unit of measure	**2023/24**	2022/23	2021/22
Safer gambling	Upheld breaches of advertising codes	Number	**1**	1	1
	Total spend on television and radio safer gambling advertising (Mecca and Grosvenor)	Reporting currency	**£2.2m**	£1.1m	£1.0m
	Percentage of customers under 25 by:				
	UK venues	Percentage	**22%**	22%	23%
	UK digital	Percentage	**13%**	10%	12%
	Spanish digital	Percentage	**14%**	13%	8.4%
	Number of safer gambling interactions (UK digital)	Number	**136,138**	291,706	257,077
	Percentage of customers who are under 25 with whom Rank have had safer gambling interaction (UK digital)	Percentage	**1.9%**	1.3%	2.0%
	Total financial contributions in support of research, education and treatment of problem gambling (covering the period of April 2023 – March 2024)	Reporting currency	**£628,580**	£576k	£402k
	Number of breaches in no-under-18s policy (UK operations)	Number	**31***	18	6
	Average number of hours of safer gambling training completed per employee	Hours	**1.1**	2.1	2.4
	Percentage of employees who completed mandatory safer gambling training on e-learning platform	Percentage	**100%**	100%	98%
	Number of non-compliance related to product responsibility	Number	**0**	0	Not reported
Health and safety	Number of accidents (UK venues)	Number	**383****	456	1,130
	Number of accidents reported under RIDDOR (UK venues)	Number	**7**	1	2
	Number of red audits	Number	**1**	Not reported	Not reported
	Number of amber audits	Number	**4**	Not reported	Not reported
	Number of colleagues that completed Health and Safety training (excludes Spanish operations)	Number	**6,479**	6,597	5,669
	Percentage of gaming floor where smoking is allowed (excludes outdoor smoking areas)	Percentage	**0%**	0%	0%
	Total paid in claims	Reporting currency	**£97,634.46**	Not reported	Not reported
	Total number of fines	Number	**0**	Not reported	Not reported
	Number of visits from EHO or fire authority	Number	**41**	Not reported	Not reported
	Number of notices as a result of visits from EHO/fire authority	Number	**0**	Not reported	Not reported
Data privacy and IT security	Total number of identified leaks of customer data (defined as information disclosed in error)	Number	**12**	7	Not reported
	Total number of identified thefts of customer data (defined as unauthorised use of data)	Number	**2**	1	Not reported
	Total number of identified losses of customer data (defined as security incident)	Number	**1**	2	Not reported
	Percentage of data breaches involving PII	Percentage	**100%**	Not reported	Not reported
	Number of hours per employee who have undertaken data protection and security training	Hours	**0.9**	0.9	0.5
	Percentage of colleagues who have undertaken data security training	Percentage	**99.5%**	97%	92%
	Statutory reports of personal data breach to the regulator	Number	**1**	0	0
Customer satisfaction	Customer complaints received	Number	**1,716**	Not reported	Not reported
	Customer complaints to Director's Resolution Office (UK operations)	Number	**70**	141	79

*The rise in breaches of the 'no under-18s' policy has been largely attributed to one Grosvenor venue changing its approach to reporting individuals entering the casino and subsequently stopping at reception due to the casino gaming line being close to the front door. We have now relocated the reception desk to enable the receptionist better visibility of those entering the premises and ensuring customers entering are immediately checked or age challenged.
**These relate to our colleagues, with top factors being slips, trips and falls.

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Colleagues

Topic	Metrics	Unit of measure	**2023/24**	2022/23	2021/22
Employment	Total number of employees (full-time + part-time)	Number	**7,594**	7,252	7,570
	Number of employees by gender (full-time + part-time):				
	Male	Number	**4,086**	3,864	3,952
	Female	Number	**3,508**	3,388	3,618
	Number of employees by age group (full-time + part-time):				
	<30 years old	Number	**2,487**	2,278	Not reported
	30–50 years old	Number	**3,327**	3,243	Not reported
	>50 years old	Number	**1,780**	1,731	Not reported
	Number of employees by geographical region (full-time + part-time):				
	UK	Number	**6,410**	6,085	6,549
	Gibraltar	Number	**86**	75	73
	Israel	Number	**10**	33	34
	Mauritius	Number	**352**	328	286
	South Africa	Number	**134**	97	79
	Spain	Number	**580**	594	509
	Malta	Number	**22**	40	40
	Number of employees by employment category:				
	Senior management	Number	**11**	11	Not reported
	Management	Number	**571**	551	Not reported
	Non-management	Number	**7,012**	6,690	Not reported
	Employee turnover (full-time + part-time)	Number	**3,189**	Not reported	Not reported
	Employee turnover rate (full-time + part-time)	Rate	**43%**	Not reported	Not reported
	Number of non-compliance due to use of child labour and/or forced labour	Number	**0**	0	Not reported
	Total amount of fines due to use of child labour and/or forced labour	HKD	**0**	0	Not reported
	Number of Town Halls	Number	**12**	12	11
	Number of underpayments	Number	**0**	Not reported	Not reported
	Total amount lost from irrecoverable overpayments	Reporting currency	**£1,125**	Not reported	Not reported
	Percentage of payroll commit dates met	Percentage	**89.5%**	Not reported	Not reported
Occupational health and safety	Number of non-compliance incidents related to health and safety	Number	**0**	0	Not reported
Training and education	Percentage of management roles on leadership training programmes	Percentage	**4%***	Not reported	Not reported
	Number of colleagues who have been trained by Grosvenor to be licensed dealers	Number	**402**	418	440
	Number of apprenticeships started in the year	Number	**17**	68	75
	Number of hours of voluntary training completed	Hours	**4,092***	Not reported	Not reported
Equality, diversity and inclusion	Percentage of employees that are women	Percentage	**46%**	47%	48%
	Number of women in senior roles	Number	**21**	Not reported	Not reported
	Gender pay gap (median gender pay gap figure for April of each year)	Percentage	**5.2%****	11.6%	Not reported
	ED&I Employee Opinion Survey ('EOS') score (average engagement score across the Group for the survey conducted in October of each year)	Number	**8.6/10**	8.3/10	Not reported

*Due to a calculation error in previous years, the 2023/24 figure is the new baseline for this metric.
**This was the median gender pay gap figure for April 2023.

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Environment

Topic	Metrics	Unit of measure	**2023/24**	2022/23	2021/22
Waste	Amount of hazardous waste (UK operations)	Tonnes	**2.28**	3.89	0.54
	Amount of non-recycled waste (UK operations)	Tonnes	**2,389**	1,149	158
	Amount of recycled waste (UK operations)	Tonnes	**2,368**	1,053	391
	Amount of non-hazardous waste (UK operations)	Tonnes	**4,757**	2,202	549
	Non-hazardous waste management method - incineration (UK operations)	Tonnes	**1,810**	857	158
	Total in fines or penalties from non-compliance with recycling legislation (UK operations)	Reporting currency	**£0**	Not reported	Not reported

Communities

Carers Trust	Funds raised for Carers Trust	Reporting currency	**£323,114**	£283,019	£284,485
	Funds raised for Carers Trust since 2014	Reporting currency	**£3,799,897**	£3,476,782	£3,193,764
	Number of carers supported	Number	**546**	480	525
	Number of carers supported since 2014	Number	**14,161**	13,615	13,135

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Sustainability Accounting Standards Board ('SASB')

To enable our stakeholders to access those ESG metrics which are financially material to the business, we have included industry-specific metrics as recommended by the Sustainability Accounting Standards Board ('SASB').

Due to the industry we work in, we report against those metrics set out in the SASB Casinos & Gaming Standard. However, as we feel that there are further non-financial metrics that are highly material to our business, we also choose to report against selected metrics from the Software & IT Services and Multiline and Specialty Retailers & Distributors standards. (We do not include all the metrics within the latter two standards, as not all are material to our business.)

Standard	Topic	Metric	Unit of measure	**2023/24**	2022/23	2021/22	Code
Casinos & Gaming, Software & IT Services, Multiline and Speciality Retailers & Distributors	Energy management	(1) Total energy consumed,	Gigajoules (GJ)	**148,415,824,433**	124,618,023 (Reported in kWh)	128,827,425 (Reported in kWh)	SV-CA-130a.1
	Energy management	(2) Percentage grid electricity and	Percentage (%)	**10%**	57%	100%	SV-CA-130a.1
	Energy management	(3) Percentage renewable	Percentage (%)	**90%**	43%	0%	SV-CA-130a.1
Casinos & Gaming	Responsible Gaming	Percentage of gaming facilities that implement the Responsible Gambling Standards and Criteria for Venues	Percentage (%) by revenue	**Not applicable to Rank's operations**	-	-	SV-CA-260a.1
	Responsible Gaming	Percentage of online gaming operations that implement the Responsible Gambling Council (RGC) Standards and Criteria for iGaming	Percentage (%) by revenue	**Not applicable to Rank's operations**	-	-	SV-CA-260a.2
	Smoke-free Casinos	Percentage of gaming floor where smoking is allowed	Percentage (%) of gaming floor area	**0% (Excludes outdoor gaming areas)**	0% (Excludes outdoor gaming areas)	0% (Excludes outdoor gaming areas)	SV-CA-320a.1
	Smoke-free Casinos	Percentage of gaming staff who work in areas where smoking is allowed	Percentage (%) of manhours	**0% (Excludes outdoor gaming areas)**	3%	0%	SV-CA-320a.2
	Internal Controls on Money Laundering	Description of anti-money laundering policies and practices		**Page 17**	-	-	SV-CA-510a.1
	Internal Controls on Money Laundering	Total amount of monetary losses as a result of legal proceedings associated with money laundering	Presentation currency	**0**	0	0	SV-CA-510a.2
	Activity metric	Number of tables	Number	**593**	622	613	SV-CA-000.A
	Activity metric	Number of slots	Number	**5,359**	Not reported	Not reported	SV-CA-000.B
	Activity metric	Number of active online gaming customers	Number	**1,103k**	1,120k	793k	SV-CA-000.C
	Activity metric	Total area of gaming floor	Square metres (m^2)	**167,809**	Not reported	Not reported	SV-CA-000.D

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Sustainability Accounting Standards Board (SASB)

Standard	Topic	Metric	Unit of measure	**2023/24**	2022/23	2021/22	Code
Software & IT Services	Data Privacy & Freedom of Expression	Description of policies and practices relating to targeted advertising and user privacy		**Pages 31, 34**	-	-	TC-SI-220a.1
	Data Privacy & Freedom of Expression	Number of users whose information is used for secondary purposes	Number	**280**	167	545	TC-SI-220a.2
	Data Privacy & Freedom of Expression	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Presentation currency	**0**	0	0	TC-SI-220a.3
	Data Privacy & Freedom of Expression	(1) Number of law enforcement requests for user information,	Number	**112**	134	101	TC-SI-220a.4
	Data Privacy & Freedom of Expression	(2) Number of users whose information was requested,	Number	**112**	160	111	TC-SI-220a.4
	Data Privacy & Freedom of Expression	(3) Percentage resulting in disclosure	Percentage (%)	**100%**	71%	75%	TC-SI-220a.4
	Intellectual Property Protection & Competitive Behaviour	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	Presentation currency	**0**	0	0	TC-SI-520a.1
	Data Security	(1) Number of data breaches,	Number	**9***	14	14	TC-SI-230a.1
	Data Security	(2) Percentage that are personal data breaches,	Percentage (%)	**60%**	78%	43%	TC-SI-230a.1
	Data Security	(3) Number of users affected	Number	**25,000****	425	660	TC-SI-230a.1
	Data Security	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards		**Page 34**	-	-	TC-SI-230a.2
	Recruiting & Managing a Global, Diverse & Skilled Workforce	Percentage of employees that require a work visa (UK only)	Percentage (%)	**0.56%**	Not reported	Not reported	TC-SI-330a.1
	Recruiting & Managing a Global, Diverse & Skilled Workforce	Employee engagement as a percentage	Percentage (%)	**79%**	72%	68%	TC-SI-330a.2
	Managing Systemic Risks from Technology Disruptions	Description of business continuity risks related to disruptions of operations		**Page 34**	-	-	TC-SI-550a.2
Multiline and Speciality Retailers & Distributors	Labour Practices	(1) Average hourly wage by region and	Presentation currency	**UK: £12.52** **Spain: €11.24**	Mecca venues: £10.80 Grosvenor venues: £12.20 Enracha venues: €12.76	Mecca venues: £9.76 Grosvenor venues: £10.92 Enracha venues: €12.40	CG-MR-310a.1
	Labour Practices	(2) Percentage of in-store and distribution centre employees earning minimum wage, by region	Percentage (%)	**UK: 39.6%** **Spain: 17.3%**	Mecca venues: 59% Grosvenor venues: 0% Enracha venues: n/a	Mecca venues: 70% Grosvenor venues: 28% Enracha venues: n/a	CG-MR-310a.1
	Labour Practices	(1) Voluntary turnover rate for in-store and distribution centre employees	Percentage	**UK: 33%** **Spain: 16.3%**	Mecca venues: 35% Grosvenor venues: 44% Enracha venues: 3%	Mecca venues: 40% Grosvenor venues: 52% Enracha venues: 4%	CG-MR-310a.2
	Labour Practices	(2) Involuntary turnover rate for in-store and distribution centre employees	Percentage	**UK: 13%** **Spain: 5.4%**	Mecca venues: 23% Grosvenor venues: 14% Enracha venues: 0.5%	Mecca venues: 9% Grosvenor venues: 11% Enracha venues: 13%	CG-MR-310a.2
	Labour Practices	Total amount of monetary losses as a result of legal proceedings associated with labour law violations	Presentation currency	**£0**	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	CG-MR-310a.3

*See page 34 for further information on our approach to data security
**One data breach as a result of a cyberattack affected 24,000 customers.

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Global Reporting Initiative ('GRI')

The Rank Group Plc has reported the information cited in this GRI content index for the period 1 July 2023 to 30 June 2024 with reference to the GRI Standards.

GRI 1: Foundation 2021

GRI standard/other source	Disclosure	Location
GRI 2: General Disclosures 2021	2-1 Organizational details	**Annual Report**
	2-2 Entities included in the organization's sustainability reporting	**Pages 02, 05, Annual Report**
	2-3 Reporting period, frequency and contact point	**Page 02**
	2-4 Restatements of information	**Pages 70 to 75**
	2-5 External assurance	**Annual Report**
	2-6 Activities, value chain and other business relationships	**Pages 04, 05, 18**
	2-7 Employees	**Page 72**
	2-9 Governance structure and composition	**Page 17**
	2-10 Nomination and selection of the highest governance body	**Annual Report**
	2-11 Chair of the highest governance body	**Annual Report**
	2-12 Role of the highest governance body in overseeing the management of impacts	**Pages 13 to 17, 21, 37, 54 to 56, 63**
	2-13 Delegation of responsibility for managing impacts	**Pages 17, 21, 37, 54 to 56, 63**
	2-14 Role of the highest governance body in sustainability reporting	**Pages 13 to 17**
	2-15 Conflicts of interest	**Annual Report**
	2-16 Communication of critical concerns	**Page 18**
	2-17 Collective knowledge of the highest governance body	**Pages 16 to 17, 39, 54, Annual Report**
	2-18 Evaluation of the performance of the highest governance body	**Page 39, Annual Report**
	2-19 Remuneration policies	**Pages 13, 15 to 17, 70, Annual Report**
	2-20 Process to determine remuneration	**Pages 13, 16, Annual Report**
	2-21 Annual total compensation ratio	**Annual Report**
	2-22 Statement on sustainable development strategy	**Page 08**
	2-23 Policy commitments	**Pages 18 to 19, throughout this Sustainability Report**
	2-24 Embedding policy commitments	**Throughout this Sustainability Report**
	2-25 Processes to remediate negative impacts	**Page 18**
	2-26 Mechanisms for seeking advice and raising concerns	**Page 18, 42**
	2-27 Compliance with laws and regulations	**Page 17**
	2-28 Membership associations	**Page 18**
	2-29 Approach to stakeholder engagement	**Throughout this Sustainability Report**
	2-30 Collective bargaining agreements	**Page 42**
GRI 3: Material Topics 2021	3-1 Process to determine material topics	**Pages 09 to 11**
	3-2 List of material topics	**Pages 09 to 11**
	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	**Pages 11, 54 to 61**
	201-3 Defined benefit plan obligations and other retirement plans	**Annual Report**
	201-4 Financial assistance received from government	**Annual Report**

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GRI standard/other source	Disclosure	Location
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	**Pages 62 to 68**
	203-2 Significant indirect economic impacts	**Pages 62 to 68**
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	**Pages 18, 71**
	205-3 Confirmed incidents of corruption and actions taken	**Pages 18, 71**
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	**Page 74**
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**
GRI 302: Energy 2016	302-1 Energy consumption within the organization	**Pages 60 to 61**
	302-2 Energy consumption outside of the organization	**Pages 60 to 61**
	302-3 Energy intensity	**Pages 47, 59**
	302-4 Reduction of energy consumption	**Pages 49 to 51, 60 to 61**
	302-5 Reductions in energy requirements of products and services	**Page 50**
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	**Page 14**
	303-5 Water consumption	**Pages 60 to 61**
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	**Pages 60 to 61**
	305-2 Energy indirect (Scope 2) GHG emissions	**Pages 60 to 61**
	305-3 Other indirect (Scope 3) GHG emissions	**Pages 60 to 61**
	305-4 GHG emissions intensity	**Pages 47, 59**
	305-5 Reduction of GHG emissions	**Pages 60 to 61**
	305-6 Emissions of ozone-depleting substances (ODS)	**n/a**
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	**Pages 47, 59**
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	**Pages 47, 73**
	306-2 Management of significant waste-related impacts	**Page 47**
	306-3 Waste generated	**Page 73**
	306-4 Waste diverted from disposal	**Page 73**
	306-5 Waste directed to disposal	**Page 73**
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	**Page 72**
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	**Page 35**
	403-2 Hazard identification, risk assessment and incident investigation	**Page 35**
	403-5 Worker training on occupational health and safety	**Pages 35, 71**
	403-9 Work-related injuries	**Pages 35, 71**
	403-10 Work-related ill health	**Pages 35, 71**
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	**Page 73**
	404-2 Programs for upgrading employee skills and transition assistance programs	**Page 39**

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GRI standard/other source	Disclosure	Location
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	**Pages 40, 72, 73, Annual Report**
	405-2 Ratio of basic salary and remuneration of women to men	**Pages 40, 73**
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	**Pages 19, 42, 72**
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments and development programs	**Page 29**
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	**Page 35**
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	**Page 71**
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling	**Pages 21 to 31**
	417-2 Incidents of non-compliance concerning product and service information and labeling	**Pages 21 to 31, 71**
	417-3 Incidents of non-compliance concerning marketing communications	**Page 71**
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	**Pages 34, 72**

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