

THE GAMESYS CODE OF CONDUCT



CONTENT



Why do we have a code



Speak up



Maintaining an
inclusive culture



Diversity, inclusion, respect



Conduct and language



Commercial
responsibilities



Assumptions, bias
and discrimination



Alcohol and drugs



Decision making
checklist



WHY DO WE HAVE A CODE?

‘Have fun, making fun’

We’re a people orientated, friendly and positive spirited organization, and we want you to help us keep us that way.

Being a great company is not just about our performance, achievements and fun culture; it’s also about behaving in a respectful and responsible way towards each other.

Our code is there to provide guidance on the behaviours and actions of Gamesys employees. It covers how we should treat each other in the workplace.

It’s there for all employees and contractors to follow, regardless of level, and underpins one of our core values - to **Be One Team**.



WHAT DO WE MEAN BY RESPECT

Respect is having regard for someone's feelings, opinions or rights, and treating others politely and with consideration.

We'd love nothing more than for those standards to be maintained 100% of the time, so in here you'll find out more about where the boundaries are - even companies like Gamesys need to have them!

We take pride in hiring great people who are a good fit with our DNA, so most of the time we are confident that people will 'do what's right', but for those times where people may not behave in the Gamesys way, we want you to know where we stand and where you can go for advice.

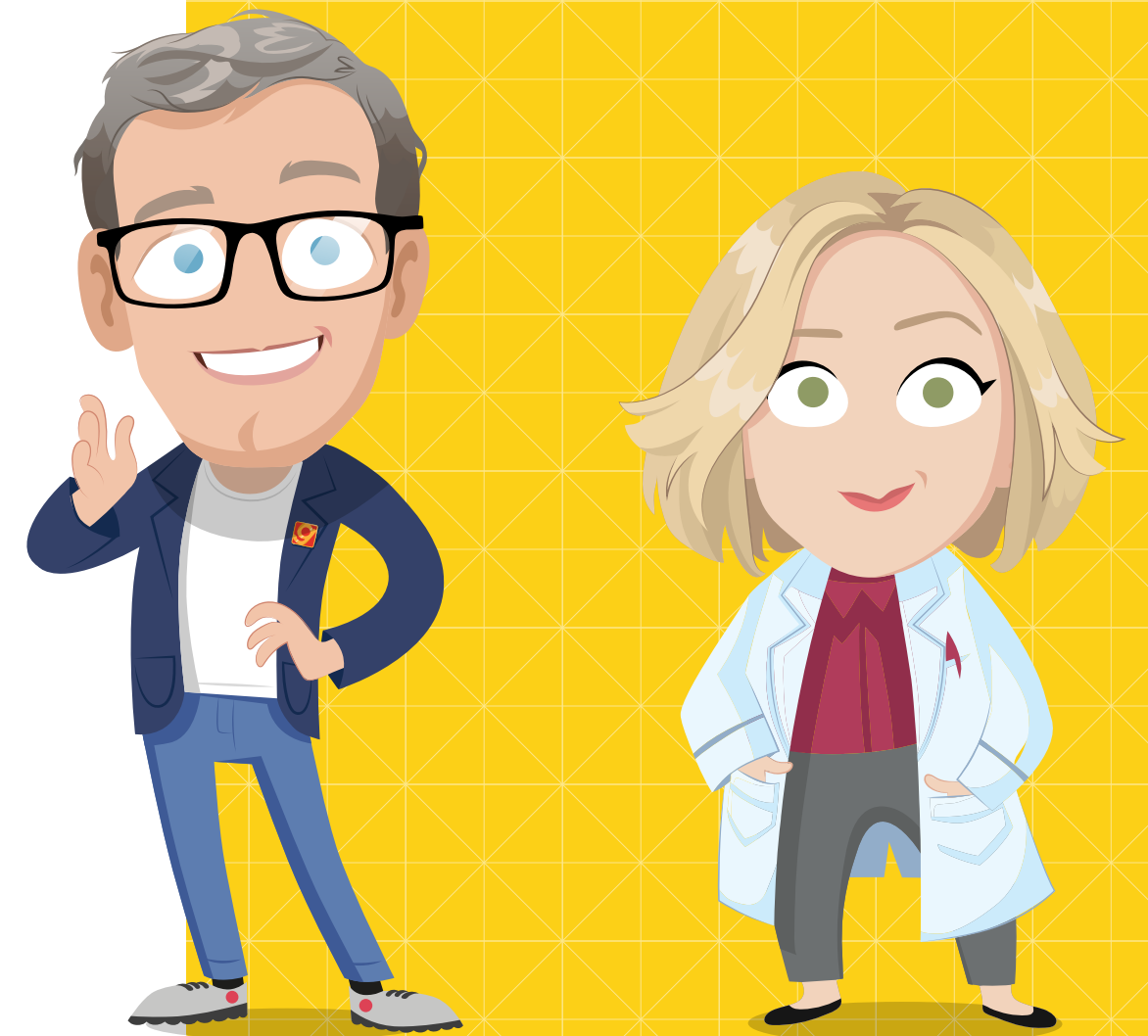
As most companies do, we have a policy for almost everything. These can all be found on GHQ and provide clear guidance on our ways of working and responsibilities.

Our Code of Conduct adds some context to existing policies and focuses on what we believe to be the key areas with regards to workplace conduct.

Our intention here is to make you really think about how you interact with one another and truly embody our 'Be One Team' DNA.

Take the time to understand our Code of Conduct and feel confident that you can speak up if you have any concerns or feel it's not being followed.

If you are a manager, you have an additional responsibility to be a Gamesys role model, consistently demonstrating these standards and our Gamesys DNA.



DIVERSITY

is about the ways we differ
from each other.

INCLUSION

is about eradicating bias, keeping an
open mind, embracing, valuing and
learning from those differences.

RESPECT

is about always showing
respect for someone's culture,
heritage, views, feelings or beliefs.



DIVERSITY & INCLUSION

“At Gamesys, we want to build a company so diverse nobody even notices”

We have always sought a very diverse workforce here at Gamesys, whether it's employing people from around the globe (76 countries at last count), to actively seeking more female tech talent, to welcoming people from all walks of life.

Our differences – our different brains and ways of thinking, different views, different experiences; represent our collective strength, and help make us a more successful business.

Diversity is the difference that each individual brings, inclusion is the environment and culture we create

together to allow those differences to thrive.

Fostering an inclusive workplace where every employee feels respected and valued is really important to us.

We expect all our employees to live up to this; providing equal opportunity to everyone regardless of differences such as (but not limited to) race and ethnicity, gender and gender identity, sexual orientation, disability, health, religion, beliefs or age.

We strive to ensure that all our recruitment and promotion or development decisions are fair and objective.

This means basing them on qualifications, performance, skills and experience.

If you're a hiring manager, we'll support you by providing training on fair and bias free selection.

Gamesys rewards great performance, so it's

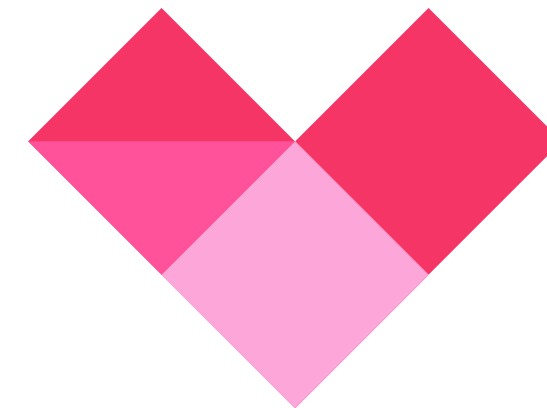
important that everyone feels their performance assessment won't be influenced by bias or prejudice, but instead be based on the quality of their work and ability to do the job.

We recognise the changing work-life needs of our employees throughout their career cycle and we endeavour to support those needs.

We will do all we can to support working parents, from enhanced Paternity/Maternity leave to flexible working or sabbaticals.

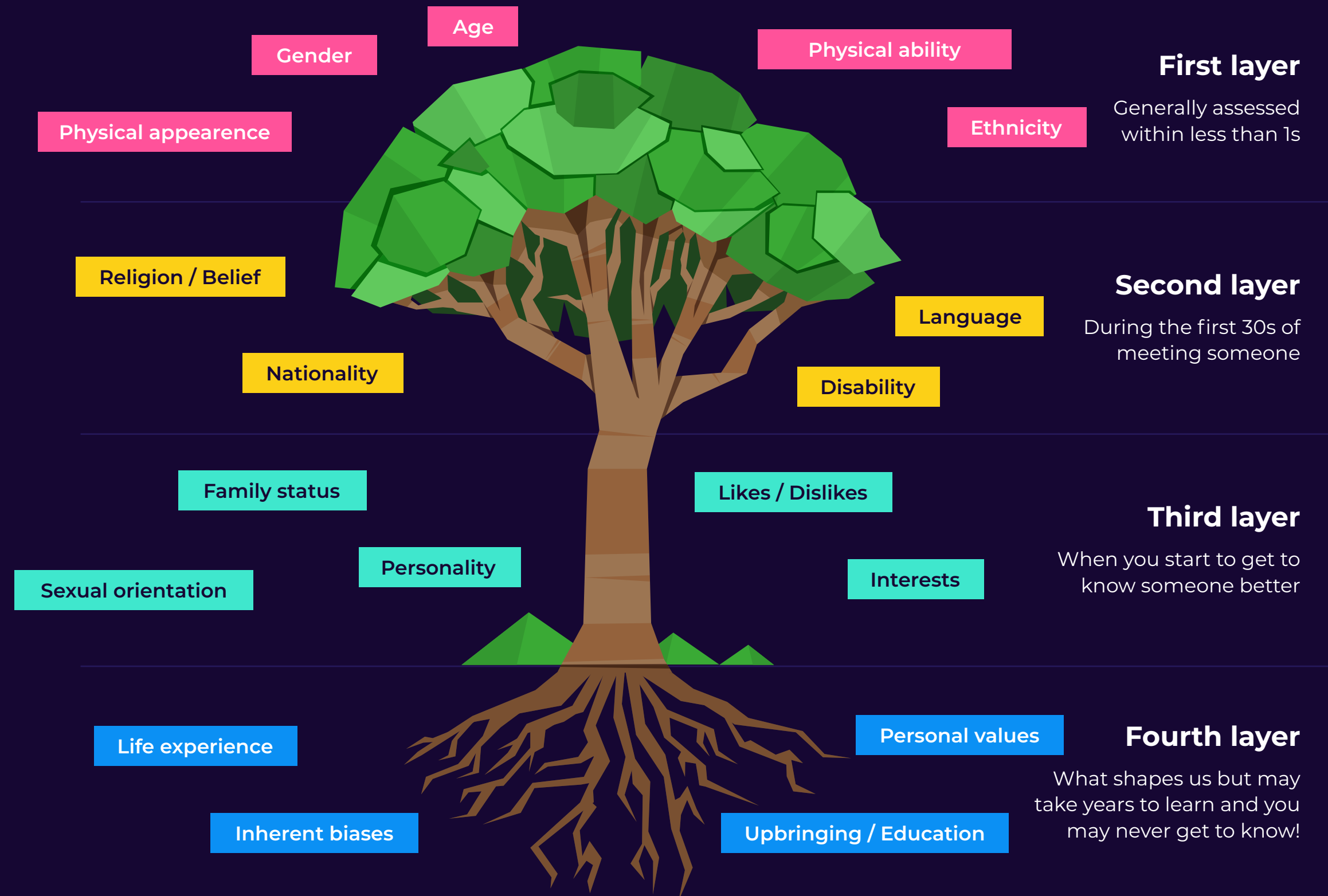
We encourage and support passionate individuals in the business to drive or participate in employee communities and networks which support diversity and seek to foster and enable a more inclusive workforce.

Please visit the employee network pages on GHQ to find out more.



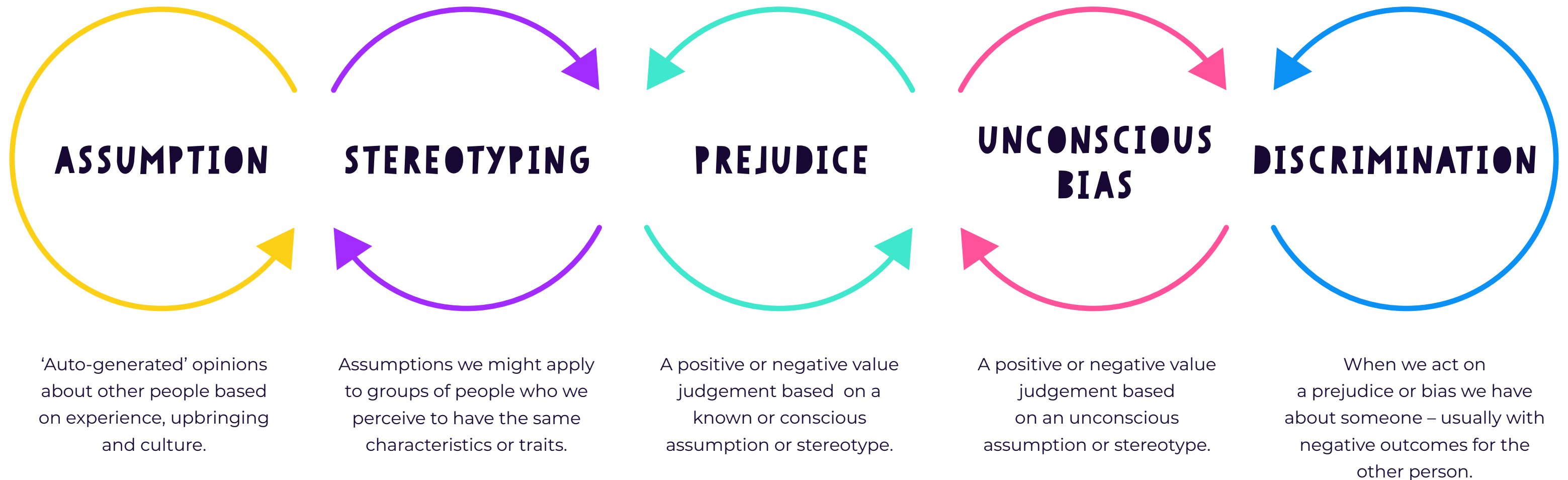
SOME DIFFERENCES ARE EASIER TO SEE THAN OTHERS...

...or so you think! It's in our nature as humans to sum up someone we meet within the first 30s. Remember, there's always more beneath the surface!



IF YOU NEVER CHALLENGE YOUR ASSUMPTIONS,

It's easy to fall into non-inclusive behaviour



WHAT DID YOU JUST SAY?!

Most offence in the workplace is caused by what people say to each other, or about each other.

Remember that everyone's personal boundaries are different, and what might be funny to one person could offend someone else. So, it might be safer to avoid telling that 'really funny' joke you heard last night if there's a chance it could offend someone!



“

Stop being so depressed and get on with it

”

We don't want political correctness for the sake of it, and we don't want people to feel that they can't have fun at work, but we do want everyone to consider their audience and the context, and to be appropriate.

Anything that calls out an individual's characteristics is tricky territory in the workplace.

This is not an exhaustive list but hopefully can help you reflect on the nuances in the language we use and the sometimes unconscious message we might be sending.

“

She's not been the same since she had a baby

”



Remember that sometimes people's differences may not be visible. Making jokey references to disability or physical and mental health issues can be offensive to people who are directly, or indirectly, impacted by these conditions.



Don't indulge in malicious gossip or say anything negative behind someone's back, if you wouldn't say it to them directly (unless it's specifically part of a personal development initiative of course, and therefore it's constructive and for their benefit!)

“

You can't see that? Are you as blind as a bat?!

”

WHAT DID YOU JUST SAY?!

“

Why do you always dress
as if you were a boy?

”

“

That outfit's
a bit frumpy
isn't it

”



“

You're being a bit of an
old woman about this

”



Avoid specific expressions that stereotype or objectify people.



Be prudent when making comments (even really positive ones!) about how people look, how attractive they are, how they're dressed. These need careful consideration.

“

You look really hot in that
dress, it shows off your
great figure

”

“

That shirt's a bit
gay mate!

”



WHAT DID YOU JUST SAY?!

“

Your spelling's terrible, did you go to school!?”

”

“

You English people are always so cold and unwelcoming!

”

“

What do you mean you don't drink?! Don't be such a party pooper!

”

“

I respect your religion, but do you need to pray 5 times a day when we are so busy

”

“

Have you never wanted to straighten your afro

”

“

You're always so quiet in meetings, you need to say more

”



Avoid any references or stereotypes that could be considered disparaging to someone's religion, cultural identity or ethnic origin.



Avoid comments that may deliberately or unintentionally exclude people, or single them out as different.



WE PREFER PEOPLE TO BE KIND TO EACH OTHER

Help us keep Gamesys a happy place!

We know there can sometimes appear to be a fine line between banter and bullying.

‘Light-hearted’ teasing can be harmless, but only if all involved are willing participants and everyone understands that the intent is innocent.

However, even if something may have an innocent intent, any behaviour that makes someone feel intimidated, uncomfortable, or humiliated could be considered to be a form of harassment.

Bullying and harassment can range from teasing right through to targeted ongoing out and out bullying. Whilst the latter may be more serious, the impact on a person can be distressing whatever form it takes.



Avoid teasing or jokes that could result in someone feeling belittled or embarrassed.



Use consistent approaches based on a situation rather than a relationship, be it positive or negative.



Do not try to coerce a colleague by pressurising them to do or say something they don't feel entirely comfortable with.



Don't use an abusive tone or throw your weight around.



Keep calm and talk things through – heated arguments or shouting can be very intimidating and upsetting for some people.



Don't send inappropriate messages to colleagues via social media or other external social forums.



Sometimes they can be very kind to each other...

We employ great people at Gamesys and we spend roughly a third of our lives at work. It's inevitable that we will form strong relationships with colleagues.

This could be in the form of friendship or romance, neither of which are frowned upon, but we do ask that you keep things professional in the workplace.

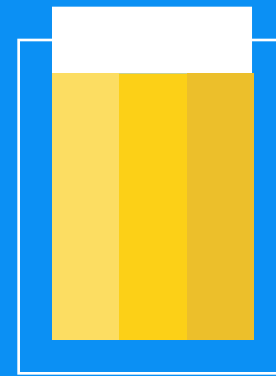
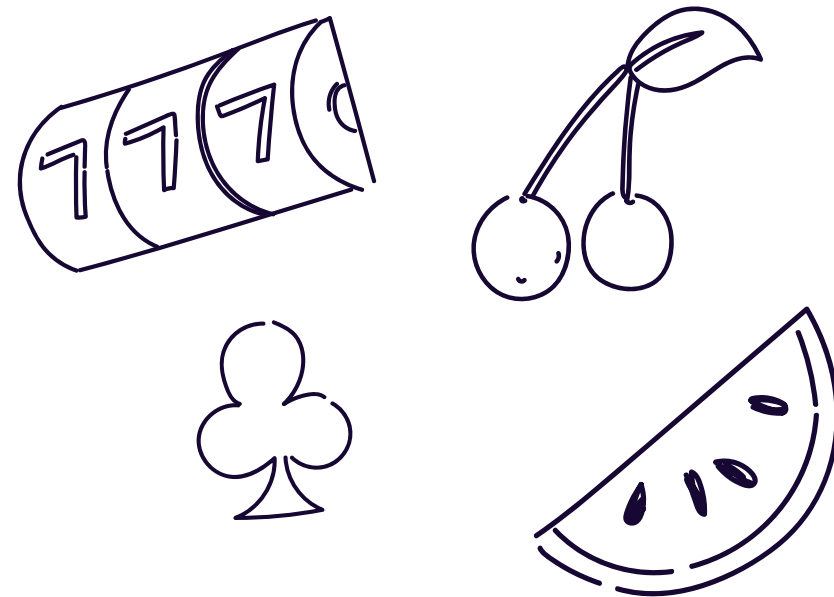
Individuals should never be 'sexualised' or objectified. If you've hooked up with someone, go easy on the public displays of affection around the office!



ALCOHOL AND DRUGS

Gamesys people like to have fun!

When there's not a pandemic knocking about, ours is a sociable environment where we work hard and enjoy getting together for social events.



It's important to remember that we expect you to use good judgement in situations where alcohol is available, and to never drink in a way that leads to inappropriate behaviour.

Know your limits!

Flirting may be harmless, but if it makes someone feel uncomfortable then it's not. Take care to read the signals and if you are prone to getting a little over friendly when you drink alcohol, limit your consumption when you're with work colleagues.

If you are a manager, you have an added responsibility to lead by example and also ensure the wellbeing of your team.



Alcohol can impair your performance so wrap up that final email or report before heading for drinks and don't return to your desk to finish your work afterwards. It is never acceptable to work under the influence of alcohol.

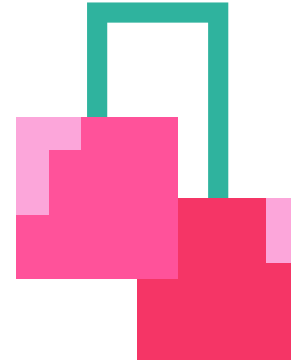
If you attend an external event, please remember that your behaviour is representative of Gamesys. Alcohol may make you loose-lipped with sensitive company information or behave inappropriately, so we ask that you handle such events responsibly and don't over indulge.

As for drugs, there's no grey area here; they are illegal. They are a firm no no in the workplace - it's never appropriate to work or attend a company event under the influence of drugs.

SPEAK UP



We encourage you to challenge inappropriate behaviour if you see it and we want everyone to feel able to raise concerns, so if you encounter any behaviour you feel conflicts with our Code, we encourage you to raise it or report it.

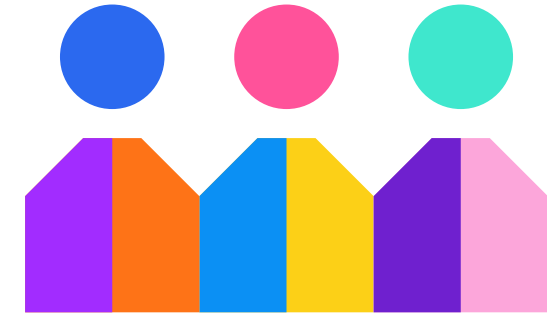


We want employees to feel comfortable doing so, and rest assured, we can discuss how to retain your confidentiality if this is a concern for you.

The situation will dictate the best path for you to report a concern.

In some instances, it might be easy to speak directly with the person(s) involved, for example if someone has said something which you've found offensive.

In other situations, you may feel more comfortable talking it through with your manager, a friend at work, or your HR business partner.



Whichever way you choose to raise or report a concern, the main thing is that you feel able and confident to do so.

We're committed to maintaining Gamesys as a safe and comfortable place for all so if in doubt, speak up!

Your local HR Team are there to listen, guide and support you, should you find yourself in any of the above situations. Speak up! You are not alone and we are here to help you. Anything you bring forward will be dealt with in the strictest confidence.



HOW CAN WE ALL MAINTAIN AN INCLUSIVE CULTURE AT GAMESYS?

ALWAYS LEARNING

Learn more about people who are different to you. Educate yourself on the social debates relating to inclusion.

Ask questions and listen actively, try to put yourself in other people's shoes.

EXPLORE YOUR ASSUMPTIONS

Challenge yourself on assumptions you might make about people who are different to you in some way.

Don't assume your perspective is the only or right way – be open to different ideas and ways to do things.

GET TO KNOW YOUR COLLEAGUES

Find out what is important to them and what you might have in common.

Respecting them will build trust, and lead to better and stronger teams.



COMMERCIAL RESPONSIBILITIES

Our Code of Conduct

focuses on workplace conduct rather than commercial responsibility, but you will find also detailed policies on the following topics (and more) on GHQ.

Security of Information

Making sure we protect our player’s personal data is a huge part of our ‘Be the Player’ DNA.

There are a few simple rules which we hope become second nature to our employees and ensures both player and company data is protected:

-  Locking your screen when you are not at your desk
-  Never leaving sensitive information lying around
-  Never sharing login details or passwords
-  Not sending confidential or commercially sensitive information via personal email accounts.

Of course, information security goes much further than this, and depending on your role you will be given appropriate training on how to manage data.

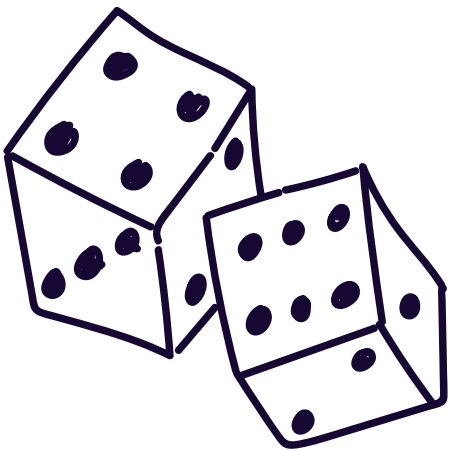
Conflicts of Interest

If you find yourself in a position where your personal and business interests could come into conflict, it’s important you discuss this with your line manager and/or HR.

Examples may include you having a personal or financial interest in an existing or potential Gamesys supplier or partner, having close relationships with people who work for suppliers or competitors, or with someone in the recruitment process, or where there is an intimate relationship with a co-worker (particularly where this is within a team).

These relationships in themselves may be fine, provided the employee ensures that no sensitive or confidential information is shared (deliberately or accidentally) outside the organization, or with those in the business who do not require access to it.

It’s always better if potential conflicts of interest are disclosed, so come talk to us!



COMMERCIAL RESPONSIBILITIES

Gifts & Hospitality

Reasonable and proportionate giving and receiving of gifts or hospitality is fine but check something out if you feel uncomfortable with the timing or value of these.

Avoid giving or accepting anything of inappropriate or disproportionate value, or payments that facilitate something that wouldn't happen without that payment.

Your line manager should be made aware of any gifts or hospitality you receive, and in some situations, it is best practice to seek approval prior to accepting anything.

Be especially prudent about accepting anything if you are responsible for supplier selection, particularly during a tender or review period, where it may be advisable not to accept any gifts or hospitality. Never give or accept any cash or close cash equivalent.

Social Media

Our employee survey results show that we are proud to work for Gamesys and we want all employees to feel empowered to be good brand ambassadors.

If you're speaking as an employee, think carefully to ensure your comments are professional, and don't share confidential information or say anything that could bring the company into disrepute.

For more details regarding personal and professional use of social media, please refer to our Social Media policy.

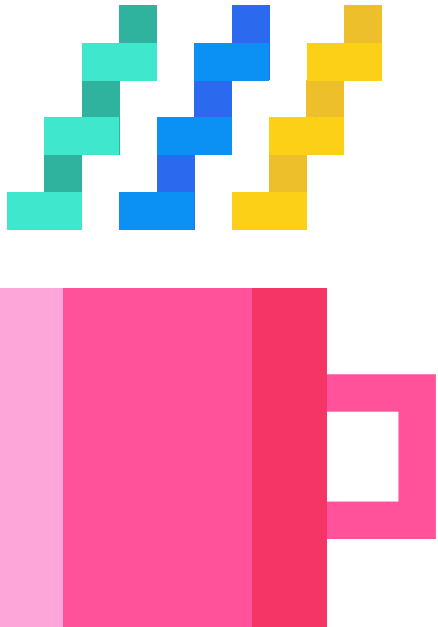
Confidentiality

Confidential information may include trade secrets, business and marketing plans, consumer insights, designs, customer databases, personnel records and any non-published financial or other data.

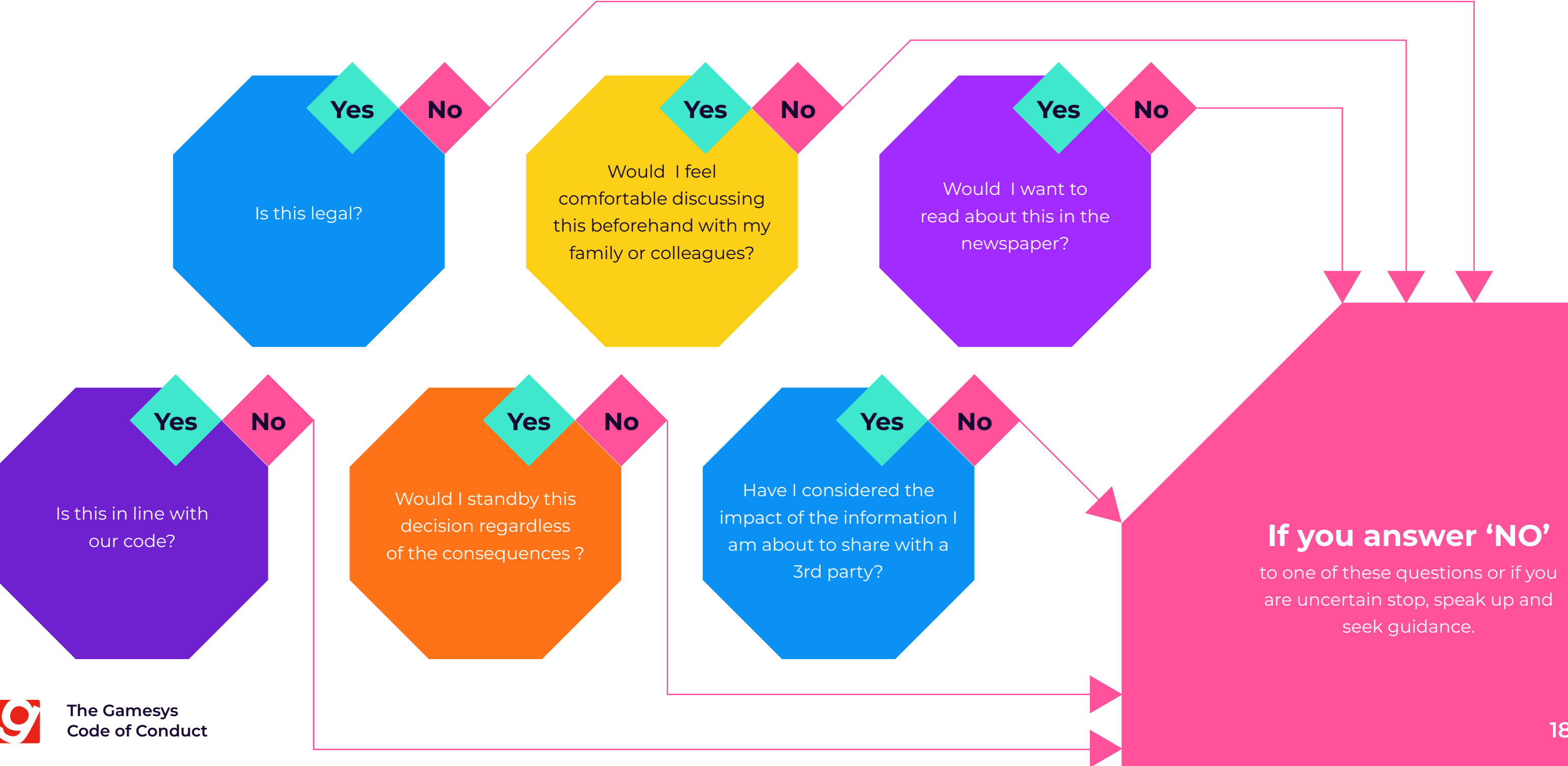
Take care not to share this information, whether intentionally or unintentionally, with people outside of the business.

Physical Assets

Keep Gamesys property safe and secure at all times. Do not use Gamesys property for personal activities unless this has been agreed in advance!



COMMERCIAL RESPONSIBILITIES





*This code of conduct is to be read in conjunction with your Contract of Employment, and any HR and company policies. It's important to also note that local employment laws may supersede this code in the event of conflicts.