



To excite and to entertain

Sustainability Report
2022

A logo consisting of the letters "MECC" in a stylized font, where each letter is a different color (M is pink, E is yellow, C is blue, C is green).



About Rank

Who we are

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

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 business

A unique blend of experiences, branded venues and digital channels in the UK and Spain.

Introduction

Rank has been entertaining Britain since 1937.

We bring excitement to millions around the world with our gaming-based entertainment brands and we are committed to doing this in a responsible way.

We continue to develop the products, tools and measures available for our customers to manage their play safely.

We also have the responsibility to improve our consumption of resources, entrusting our colleagues with the initiatives to deliver a sustainable operational impact.

And we believe that by playing our part in the community, we can realise important socio-economic benefits.

Contents

About Rank

- 01 About this report
- 02 Our business
- 04 CEO's letter
- 06 ESG roadmap
- 07 Materiality assessment
- 08 ESG strategy
- 10 Customer understanding

Governance

- 14 ESG & Safer Gambling Committee Report
- 17 Governance framework

Customers

- 22 Safer gambling
- 27 Preventing underage play and protecting vulnerable customers
- 28 Customer privacy and data security
- 29 Product safety and quality
- 31 Ethical marketing
- 32 Health and safety
- 32 Customer service

Colleagues

- 34 Leadership capability
- 34 Employee training and development
- 38 Equality, diversity and inclusion
- 41 Employee engagement and wellbeing

Environment

- 43 Our approach
- 45 Task Force on Climate-related Financial Disclosures ('TCFD')

Community

- 54 Developing our community strategy
- 54 Our Group-wide charity partnership: Carers Trust

Appendix

- 58 SASS data
- 64 GRI reference table

About this report

Basis of preparation

This report presents a review of The Rank Group Plc's ESG ('Environmental, Social and Governance') commitments and approach.

The Group is dedicated to ensuring the sustainability of its operations by aligning its processes and policies to international best practice as part of its strategy to build an even more resilient and responsible business.

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

Reporting standards and frameworks

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

For the purposes of this document, the following standards inform our approach and will help structure the disclosure of information as we progress with our reporting.

Sustainability Accounting Standards Board ('SASB')



SASB helps companies to disclose their financially material ESG information for investors. There are 77 standards, each one being a minimum set of sustainability issues most likely to impact financial performance. These include specific industry sub-standards relevant to our operations, including Casino & Gaming, Multiline and Specialty Retailers & Distributors, and Software & IT Services. This allows investors to efficiently access the data appropriate to their investment criteria.

Global Reporting Initiative ('GRI')



The GRI helps businesses to communicate their sustainability information, giving guidance on how to prepare reports. With the GRI, a company is disclosing information to a wide variety of global stakeholders, hence the standards are very broad in scope and useful in designing sustainability reports. We have included a GRI reference table at the end of this report to signpost where relevant information can be found.

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



The TCFD, chaired by Michael Bloomberg and championed by former Governor of the Bank of England, Mark Carney, is an initiative that seeks to develop consistent climate-related financial risk disclosures for use by companies in providing information to investors, lenders, insurers and other stakeholders to help them understand the impact climate-related risks could have on our Company in the future.

The four pillars of the TCFD

The TCFD sets out its recommendations under four key pillars; Governance, Strategy, Risk Management, and Metrics and Targets and includes an appreciation of Board oversight as well as management's role in assessment and mitigation.

Strategy asks businesses to detail the 'actual and potential impacts of climate-related risks and opportunities', including the impact that they would have on the organisation as well as the resilience of the organisation in the face of climate-related scenarios. A key element of strategy is determining the short-, medium- and long-term climate-related risks that could impact a company.

The TCFD suggests that organisations use scenario analysis to assess potential business, strategic and financial implications of climate-related risks and opportunities. These climate-related risks are categorised as physical (risks that cause physical impacts such as extreme weather events or sustained higher temperatures) or transition (risks felt by the transition to a lower-carbon economy such as policies intended to reduce actions that are harmful to the environment). It is important for companies to consider both types of risk when carrying out scenario analysis, as their effects are highly uncertain and will shape the medium- and longer-term future.

Under Risk Management, companies should demonstrate the processes they operate to 'identify, assess and manage climate-related risks', and how these processes 'are integrated into the organisation's overall risk management'.

Finally, companies should disclose the 'metrics and targets' used to assess and manage relevant climate-related risks and opportunities', including Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas ('GHG') emissions.

Our business

A unique blend of experiences, branded venues and digital channels in the UK and Spain.

Our branded venues and digital channels



64 Mecca branded venues

Mecca is Rank's community-gaming brand for the British market. A national portfolio of 64 venues offering bingo, slot machine games, great value food and drink, and live entertainment.

64



52 Grosvenor branded venues

The UK's largest multi-channel casino operator with 52 venues. The brand offers a range of casino table games, including roulette, blackjack, baccarat and poker as well as electronic roulette and slot machine games.

52



9 Enracha branded venues

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

9

Mecca digital channels

The digital channels offer a range of popular games like bingo, a wide range of slot games and table games.

Grosvenor digital channels

The brand's complementary digital channels offer many popular games, including its successful live casino, in addition to a sports betting offer.

Enracha digital channels

Enracha also has a small complementary digital offer.

Our digital only brands

Omni-channel – extending the customer experience

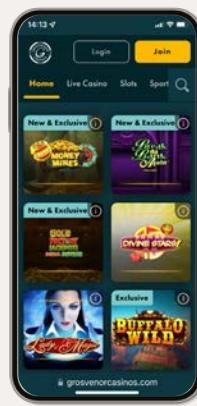
Our markets

The Group operates the market-leading digital bingo brand, YoBingo, to the Spanish market alongside its newer digital casino offer, YoCasino.

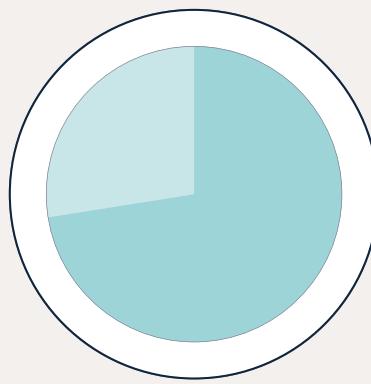
In addition to its established brands the Group also operates multiple digital brands using a combination of proprietary and non-proprietary brands using a combination of proprietary and non-proprietary licensed software providing online bingo, casino and slot gaming.



Our aim is to provide a seamless, continuous and personalised customer experience regardless of channel our customers wish to use.

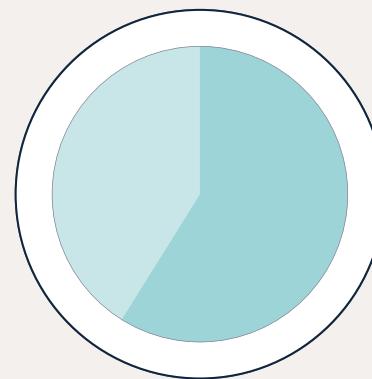


Split of like-for-like net gaming revenue ('NGR') – UK¹



1. For the year ended 30 June 2022.

Split of like-for-like net gaming revenue ('NGR') – Spain¹



CEO's letter

Dear fellow stakeholder,
I am pleased to share
with you our first full
Sustainability Report,
following the
publication of our
interim Responsible
Business Report in
January 2022.

John O'Reilly
Chief Executive



This report builds on the commitments we set out earlier this year, by adding important performance context and metrics upon which we will look to improve year on year.

The process we have undertaken to date has assessed the perspectives of both internal and external stakeholders to determine the material risks and opportunities that are relevant to our operations. We are keen to ensure that the respective audiences for our communications receive a clear and transparent understanding as to how we are managing those issues.

We consider our impact under our four ESG focus areas of Customer Experience, Colleague Experience, Environmental Management and Community Engagement. To deliver the best Customer Experience, the promotion of safer gambling is integral to everything that we do at Rank. We continue to assess and update the tools and methods we utilise to best empower our customers to gamble responsibly, and the training we are undertaking in partnership with GamCare this year means our colleagues will be even better placed to identify 'at risk' play.

I am very proud of the commitment and passion that is apparent among Rank's colleagues, especially in their motivation to take on new challenges and expand their experience. To ensure that the Colleague Experience at Rank is a positive one, we continue to listen to our employees and respond to their feedback. This year we have put greater focus both on our wellbeing offering and support, and on further developing our approach to being an inclusive employer that promotes equality and diversity.

In progressing our Environmental Management, we have not only begun assessment of our carbon footprint and identification of possible emissions reductions strategies, but we are also addressing the potential impact of climate change risk on our business. This report contains our maiden alignment with the recommendations of the Task Force on Climate-related Financial Disclosures.

Our central role in communities, especially through our Mecca venues, means that Community Engagement is a fundamental pillar of our ESG approach. At Group-level, through our partnership with Carers Trust, we have raised over £3m for the charity since 2014, while at local level, employees support all manner of community initiatives, informed by the strong ties they have with local people. We look forward to formalising this approach, whilst maintaining the core purpose – to support the communities in which we operate.

Significantly, the outputs of our assessments have led to the inclusion of sustainability-related objectives in our revised Group strategy and these non-financial operational metrics will be monitored and measured in just the same way as our financial KPIs, providing a much more integrated appreciation of our progress as an organisation, reported in line with our financial calendar.

During the course of the year we have received a range of ESG-related enquiries from stakeholders and these considerations will continue to shape our approach and disclosures as our operations evolve and we extend our engagement with these audiences. We are also aware of the evolving regulatory landscape for sustainability disclosures and believe we have embedded the intent of current requirements into our operational thinking, so the meeting of our legislative obligations is not merely an exercise in compliance.

"Our reporting is also benchmarked against the requirements of the Sustainability Accounting Standards Board ('SASB') including Casino and Gaming supplementary disclosure and references the Global Reporting Initiative ('GRI')."

Our reporting is also benchmarked against the requirements of the Sustainability Accounting Standards Board including Casino and Gaming supplementary disclosure, as well as the Global Reporting Initiative's core disclosure. These indices establish an internationally-recognised standard that is expected by our stakeholders and provides the Group with key insights into potential initiatives and opportunities that can make our operations even more robust.

We know there is more to do, so whilst we are encouraged by our progress to date, this will be a continual journey that will require a further range of actions and commitments including the development of our carbon net zero strategy which we are currently working on.

My thanks extend to all our employees and stakeholders who have contributed to this crucial and rewarding journey to date, and as ever we welcome feedback on our progress.

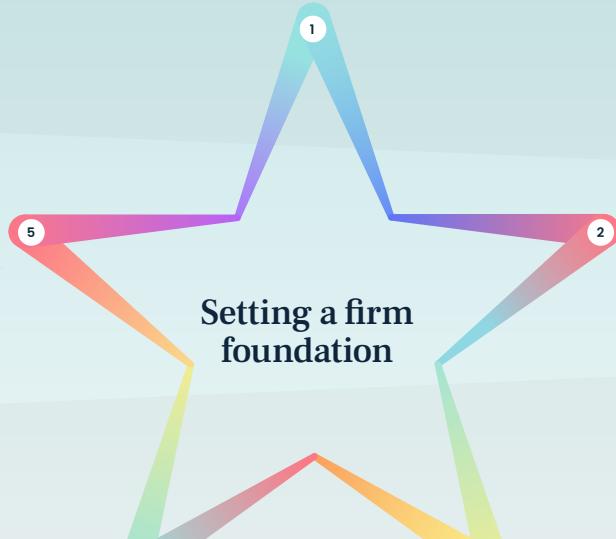


John O'Reilly
Chief Executive

ESG roadmap

Our ESG strategy roadmap

- 1 Establish ESG & Safer Gambling Committee and form ESG Steering Group
- 2 Conduct materiality assessment and define Rank Group ESG strategy
- 3 Create reporting framework and define non-financial KPIs
- 4 Identify initiatives to meet strategic ESG objectives
- 5 Establish baseline data points for new non-financial metrics



Publish maiden full Sustainability Report, and ensure integration of approach into core Group strategy

Continue to develop systems for data collection and assess disclosures based on stakeholder feedback

Materiality assessment

As the focus on companies' ESG management and their approach to climate change in particular has sharpened, we feel that listening to our stakeholders and utilising their expertise is more important than ever.

Our materiality assessment, conducted in the 2020/21 financial year by Buchanan Communications, established the most important issues to Rank's stakeholders. We reached out to investors, suppliers, customers and the industry regulators, as well as subject matter experts within the Group, to understand their view on the most material risks and opportunities Rank faces. The results have shaped and will continue to inform our ESG strategy.

We have also had conversations with our shareholders during the year, including our largest investor, concerning our ESG management approach and how we are considering climate-related risk. Shareholders vary in their expectations for disclosure, and while we are keen to satisfy the reporting criteria laid out wherever possible and appropriate, we recognise that our ESG journey is ongoing.

This maiden full year Sustainability Report has been shaped by what has been defined as material to our business through this ongoing process of engagement with stakeholders.

Strategic alignment

During the development of our sustainability focus areas, it has been important to ensure that our objectives relate to and integrate with our Company growth objectives. They cannot and should not sit in isolation from our commercial goals.

Our aim and obligation to shareholders is to be careful custodians of their investment and this review of material issues within our operations has improved our appreciation of material risks, aiding our management and mitigation of potential issues to preserve value in our organisation.

Sustainability also presents an opportunity to review our use of resources and better formalise the approach that we take to our customers, colleagues and communities in order to drive positive impacts and value creation. The process of engagement with our investors and other stakeholders has led us to consider our role as a corporate citizen and what constitutes 'good growth', that is sustainable over the long term.

Our goal is to offer the best customer experience and to put customers at the heart of our business. Our approach to safer gambling ensures that we maintain and contribute to best practice standards across the business and, where possible, the industry as a whole. All our employees are trained to support our safer gambling objectives, and to check our performance, we continually seek the views of our customers and encourage feedback.

We provide entertainment in an industry that has excited people since the dawn of time. In a carefully regulated market where we can educate our people to deliver safe products and services and empower our customers to better manage their own experience, we look confidently towards a sustainable future.



About Rank

Governance

Customers

Colleagues

Environment

Community

Appendix

ESG strategy

Group strategy

Strategic Pillars

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

Summary KPIs

There are a range of performance indicators within this report that set baselines and chart progress against our key ESG objectives. Some of these have been identified to monitor and measure progress in relation to our key material risks and opportunities and some are included as reference to the recognised international reporting standards.

ESG focus areas and objective

Customer Experience



- Provide a safe, secure environment and personal experience.
- Create and maintain good gambling behaviours.
- Protect vulnerable customers.

Percentage of customers using safer gambling tools

257,077

2021: 444,239

An important way of preventing harm and ensuring a positive experience is empowering our customers to access safer gambling tools.

Colleague Experience



- Educate our people to enable and encourage positive gaming behaviours.
- Create a fair, safe and inspiring working environment.

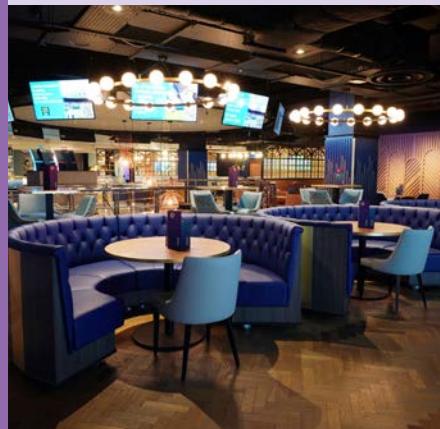
Employee opinion survey engagement score

68% (+3ppts)

2021: 65%

To deliver an exciting and entertaining experience, we require a workforce of engaged and motivated employees.

Environmental Management



- Ensure that our operations minimise any negative impacts we may have.
- Reduce our carbon emissions wherever possible.

Energy use as an intensity ratio (tCO₂ per £m Net Gaming Revenue)

39.2 (-40%)

2021: 65.8

We have engaged with our utility suppliers, fleet managers and carbon consultants to understand where we can make CO₂ savings across our operations.

Community Engagement



- Provide an essential social outlet for customers and generate lasting community spirit.
- Drive community action and develop genuine social legacy.

Charitable contributions

£284,484 (+6%)

2021: £267,263

Through our venues, we connect with a wide range of communities and have the ability to positively impact socio-economic standards, through jobs, tax payments and charitable donations.

Customer understanding

Due to the wide variation in our different customer types, we do not adopt a single model of customer protection. Our approach is determined by each player's personal profile and playing behaviour rather than a one-size-fits-all methodology. Our interactions with them will be personalised based on their individual risk factors, such as affordability and frequency of play, and they will experience different colleague engagement in venues and online customer journeys as a result.

We use a wide range of factors to identify customers who may be at risk of problem gambling, which include live monitoring, use of algorithms for digital customers and a combination of data and colleague insight in venues.

Here we provide an overview of our key customer groups:

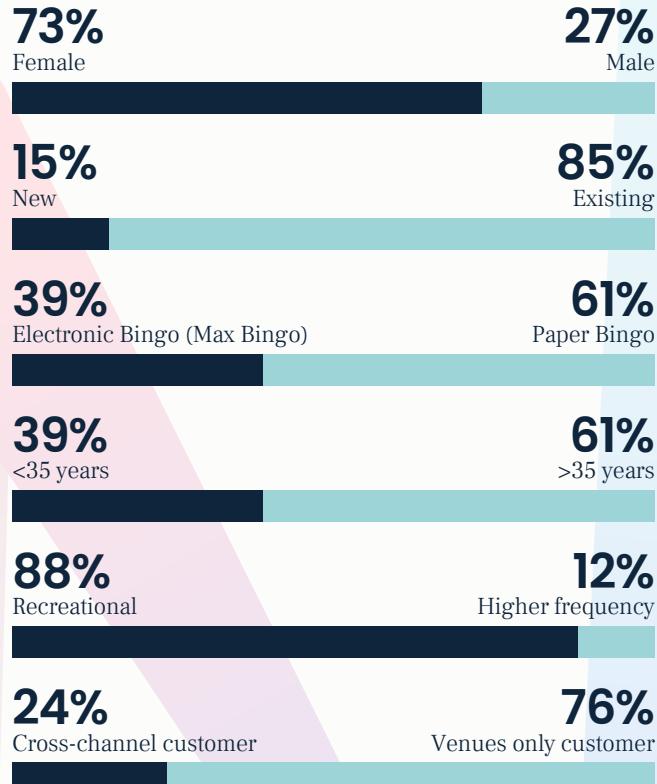
Mecca venues



Mecca is our highly-trusted and community-focused land-based brand known for the friendliness of our colleagues and opportunities to win big.

- Bingo has relevance and appeal to approximately 30% of the population but needs to evolve to meet their changing needs.
- Overall, the bingo market continues to consolidate.
- There is a desire for new experiences that are engaging, safe and value for money.
- There is a desire for more accessible, modern and lively bingo venues complemented with an enjoyable food and beverage offer.
- Post the COVID-19 pandemic the returned younger players are playing more often but the older players are playing less.
- Average Mecca customer age is 44 years; however, the most frequent customers are females between 60 and 70 years old.

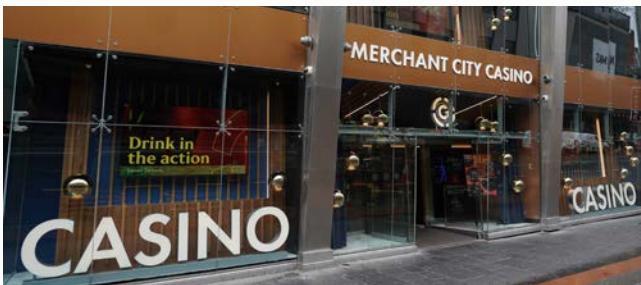
Customer analysis



Learn more about Mecca:
www.meccabingo.com

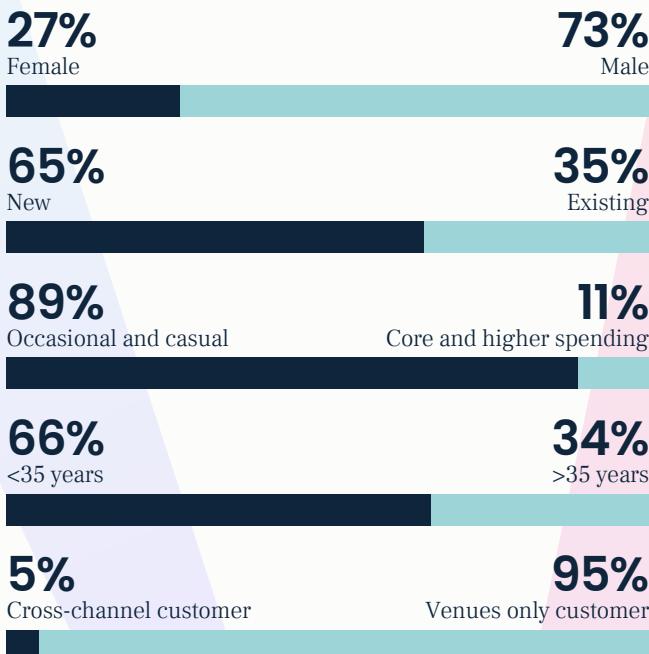


Grosvenor venues



- Approximately 8% of the UK population visit casinos at least once a year, though an additional 12% would consider visiting a casino if the offer was different to what they perceive a casino to be.
- There is a desire for fun, enjoyable, friendly and welcoming experiences in a safe and secure environment.
- There is a need for more modern and innovative experiences without losing the thrill and excitement of playing in a casino.
- Average Grosvenor customer age is 39 years; however, the customers that visit the most and have higher levels of spend are over 56 years old.
- Male to female split for Grosvenor's customers is 4:1.

Customer analysis



Learn more about Grosvenor:

www.grosvenorcasinos.com



Enracha venues



Enracha is our Spanish land-based venues brand providing a predominantly bingo-based gaming experience.

- 1.4m people in Spain visited a bingo venue in 2020, showing that venues bingo has relevance and appeal to approximately 6% of the Spanish adult population.
- Customers place greater value on excellent customer service and seamless customer journeys.
- There is a need for state-of-the-art electronic gaming areas which are comfortable and modern, complemented by additional games such as customised jackpots and loyalty card functionality.
- Enracha's biggest customer group is the 26 to 35 years category, representing over 23% of total customers, but they generate only 12% of total visits. Whereas customers over 65 years represent 14% of the customer base, but generate 29% of our visits.
- The most frequent Enracha customers are females over 65 years, who generate 19% of our total visits.
- Male to female split for Enracha's customers is 1:1.

Learn more about Enracha:

www.enracha.es

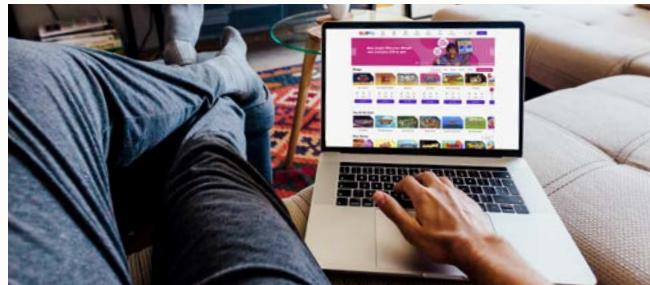


UK digital bingo



- 2% of the UK population play online bingo each month; the growth opportunity that exists within this segment remains significant.
- Customers are looking for their experience to be safe and secure, where it's easy to receive winnings and where they have fun and more chances to win.
- The experience needs to be to be intuitive and easy for customers to use. This includes having a reliable app which is straightforward to use.
- There is a growing demand from customers for variety, whether that be the promotions that cater for a wider range of budgets, or the games and features available. Customers are wanting more interactive and free-to-play mechanics that allow their money to go further.
- Customers expect safer gambling to be embedded across their experience with the provision of safer gambling tools available upfront in their customer journeys.
- The average online bingo player age is 39 years, slightly older than that for Mecca at 38 years.

UK digital casino



- 4% of the UK population play online casino each month, with opportunities for growth through delivery of a stronger, seamless cross-channel customer experience.
- There is a desire for great looking sites which offer the best in new games along with strong promotions.
- Providing exciting and entertaining experiences and being a brand that listens to customer feedback and meets their needs is important to players, as is the need to reward loyalty and offer opportunities to win big.
- Customers have a preference for sites that provide tools to help them control their spend and where there is swift and seamless payment of winnings.
- The average online casino player age is 37 years, younger than that for Grosvenor at 41 years.

UK population playing online bingo each month

2%

UK population playing online casino each month

4%

By establishing a robust ESG governance framework we maintain strong oversight of all ESG-related issues, with clear lines of responsibility and accountability. In an ever-evolving regulatory environment we keep informed of developments by monitoring legislative change, working closely with the regulatory bodies in each jurisdiction of our operation, and through industry association membership and participation.



ESG & Safer Gambling Committee Report



Katie McAlister
Chair of the ESG & Safer Gambling Committee

Dear shareholders

In my first report as Chair of the ESG & Safer Gambling Committee, I am pleased to provide a summary of the work undertaken by the Committee over the past 12 months and present the progress made in evolving our ESG strategy.

The Group is committed to ensuring the sustainability of its operations by aligning its processes and policies to international best practice as part of its aim to build an even more resilient and responsible business. We recognise that how we consider ESG risk and opportunity is critical to the success of our business and that our key stakeholders are demanding greater transparency and disclosure.

At the beginning of 2022 we were pleased to launch our first Responsible Business Report, which provided an overview of the foundation work undertaken to establish the appropriate approach to ESG at Rank. Following the next stage of work, we are delighted to publish this 2022 Sustainability Report.

Key activities

Last year, the Committee determined that it would provide rigour, support and challenge to the business as it develops and implements its new ESG strategy. Following completion of the materiality assessment in 2021, this year the Committee approved the four key ESG focus areas that underpin the strategy:

1. **Customer Experience** – providing a safe, secure environment and personal experience, creating and maintaining good gambling behaviours and protecting vulnerable customers.
2. **Colleague Experience** – educating our people to enable and encourage positive gaming behaviours and creating a fair, safe and inspiring working environment.
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.
4. **Community Engagement** – providing an essential social outlet for customers, generating lasting community spirit, driving community action and developing a genuine social legacy.

Each focus area has underlying objectives and baseline KPIs.

The Committee then challenged the business to ensure that the Company's ESG objectives relate to and are amalgamated with its corporate objectives.

The refresh of the Group's purpose and strategic pillars, approved by the Board, ensured the integration of the four ESG focus areas into the Group's corporate aims, as articulated on page 55 of our 2022 Annual Report. As a result, the Committee is comfortable that Rank has a fully integrated ESG and corporate strategy going forwards that will enable the business to continue to be managed in a sustainable and responsible way. During the year the Committee also oversaw the implementation of the necessary governance structure to ensure that there is effective oversight of the strategy and delivery of initiatives under it.

In developing its approach, the business, overseen by the Committee, ensured that each existing ESG initiative was allocated to one of the four focus area with an owner, timeline and appropriate KPIs. Going forwards, updates on each initiative (and proposed new initiatives) will be considered on a monthly basis by the management-level ESG & Safer Gambling Steering Committee, which will report to this Committee on a regular basis. This will enable us to track and evaluate progress and provide Board-level oversight of performance against strategy, as well as global best practices.

Initial work on each of the four focus areas was presented to the Committee during the year, which prompted more detailed discussion on each area's key aims and initiatives and the manner in which the broader ESG strategy will be embedded within the business. This included, for example, discussions on colleague engagement and development, as well as broader debate on Rank's wider social impact and community role as a primarily land-based national casino and bingo operator. It also included challenging management and the Board as a whole to focus in more detail going forwards on how environmental matters are considered within the decision-making process.

The Committee also oversaw management's work with consultant partners to develop its reporting framework to take account of Task Force on Climate-related Financial Disclosures ('TCFD') recommendations and in order to set Rank on a carbon net zero pathway. The Committee worked alongside the Audit Committee in relation to TCFD disclosures set out in this report.

Safer gambling initiatives

Safer gambling remains the Group's primary focus area. The Committee has been keen to ensure that the importance of safer gambling within Rank's wider ESG framework is not diminished. We are comfortable that this has not happened. During the year the Committee welcomed reports from the managing directors of each business area updating on safer gambling initiatives. These initiatives take a 'customer-first' approach to increasing protection, as the Group continues to evolve its customer journeys and deliver targeted improvements for those players who need our support. The Committee has considered new initiatives presented by management as well as those introduced further to the Company's own monitoring work or as required by our regulators. We have also considered changes resulting from new regulatory requirements and industry commitments.

In addition, the Committee welcomed further work on embedding a safer gambling culture throughout the Group. The aim of this work is to instil a consistent approach in colleague mindset to ways of working and processes in line with Rank's purpose, delivering exciting and entertaining experiences within a safe environment. One of the ways in which this is being achieved is through a training programme being carried out in conjunction with GamCare, in which over 1,100 colleagues will take part. The training is intended to benefit not only customer-facing colleagues, but also those that support them to ensure a consistent and evolving ethos across the Group. The Committee will receive reports on the feedback and evaluation of the training programme during the forthcoming year.

During the year, the Committee continued to take the lead on reviewing the Group's response to the Gambling Commission's Annual Assurance Statement, which was then presented to the Board for approval prior to submission. We also considered over the course of the year progress against the initiatives highlighted in that statement.

Safer gambling horizon scanning and industry collaboration

The Committee regards safer gambling as a topic of key importance to all the Company's stakeholders and an important part of its work is to consider their views on the Company's approach. With this in mind, the Committee recognises that the Company cannot simply look at the initiatives it has in-train as a reaction to regulation, but must also pro-actively consider customer, regulator, colleague, shareholder, political and wider public sentiment in its plans. The Committee receives regular reports from the Director of Public Affairs to ensure that it remains up-to-date on external sentiment, influences,

"The Committee recognises that how we consider ESG risk and opportunity is critical to the success and sustainability of the business."

developments and political change. It challenges the business to ensure that it considers such views in all projects and initiatives across all workstreams.

In particular, 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. The Committee continues to consider stakeholder views and those of the industry and media on the review. We note that the Government's White Paper is expected to be published imminently and, following its publication, we will continue to monitor stakeholder reaction as the business assesses the impact of forthcoming changes. The Committee also considered the Commission's response to its remote customer interaction consultation and subsequent new requirements published as guidance in June 2022 for implementation in September 2022. The Committee will monitor effective implementation of any changes required to be implemented by the Company.

Rank's contributions to the Government's review and consultations 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, all of which are important voices in respect of regulatory change. We continue to have representation on the BGC's committees and working groups, including all those specific to land-based gaming.

Research, education, treatment ('RET')

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

Climate change, net zero planning and Task Force on Climate-related Financial Disclosures

There has been increasing focus from stakeholders as to how climate change will impact companies. We recognise that there are both internal and external expectations on us to establish a clear emissions reduction strategy in line with international climate change targets and we are working with consultant partners in order to set Rank on a carbon net zero pathway. More detail on this is set out on page 43 of this report.

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 2022 Annual Report setting out whether our climate-related financial disclosures are consistent with the recommendations of the TCFD. The statement can be found on page 45 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. The Committee's progress against last year's actions are set out below.

Outcomes from 2020/21 review

1. Agreed actions

To widen the remit of the Committee to encompass ESG more broadly, but without losing its focus on safer gambling.

Progress made during 2021/22

The Committee's remit has been widened, with the right level of emphasis being retained in respect of safer gambling. It is committed to ensuring this remains the case going forwards.

2. Agreed actions

To consider and approve a wider ESG strategy and the priorities within that strategy to enable the Committee to assess delivery against it.

Progress made during 2021/22

The ESG strategy has been approved and the priorities and baseline KPIs have been determined based on the materiality assessment conducted the previous year.

“Safer gambling is the Group’s primary ESG focus area and a topic of key importance to all our stakeholders.”

Outcomes from 2021/22 review

This year's Committee evaluation exercise was facilitated externally by Lintstock Limited and concluded that the Committee continues to operate effectively. The process for such review is set out on page 104 of our 2022 Annual Report. Having considered the findings, we agreed that our priorities for the forthcoming year should be:

1. To develop the Committee's meeting agendas further in line with the newly developed focus areas of Customer Experience, Colleague Experience, Environmental Management and Community Engagement and their associated KPIs.
2. To ensure clear accountability for reporting under the new KPIs, delivery of actions and tracking of progress.

In conclusion

Rank recognises the importance of sustainability and resilience to all our stakeholders and the value of continuing to develop a robust strategy that protects shareholder value, creates opportunities for growth and innovation and sets the foundation for long-term success. It is committed to doing so.

We also remain committed to providing a safe gambling environment for customers to enjoy the services that we offer. We aim to work constructively with regulators to ensure ongoing compliance with regulatory requirements and our industry peers to continue to develop a collaborative approach to safer gambling matters such as improving the identification of vulnerable customers. Finally, we continue to recognise the importance of driving cultural change throughout the organisation so as to 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 that will be made over the forthcoming year under our expanded ESG strategy and agenda.

Finally, my appointment as Chair followed the departure of Susan Hooper from the Board at the end of January 2022 and I wanted to take this opportunity to thank her for her contribution towards driving Rank's ESG and safer gambling agenda. In other changes to the Committee, I am delighted to welcome Lucinda Charles Jones, our new independent Non-Executive Director, as a member. Lucinda has particular expertise in people, social and environmental matters and I look forward to her contribution as we progress into delivering the next stage of our ESG agenda.

I look forward to meeting shareholders at our Annual General Meeting on Thursday 13 October 2022 when I will be happy to answer any questions on this report.



Katie McAlister

Chair of the ESG & Safer Gambling Committee

Governance framework

The Rank Board has a clear commitment to robust corporate governance and believes that good governance leads to stronger value creation and reduces risk for all stakeholders. It maintains a clear focus on high standards, ensuring that Rank's governance framework meets the needs of the business and is appropriately aligned with best practice. More about Rank's approach to corporate governance can be found in the our Governance Report, which commences on page 87 of the 2022 Annual Report.

Rank is also extremely cognisant of its regulatory environment. Regulators monitor the high standards by which we operate. We ensure that we maintain collaborative relationships with regulators and legislators, engaging in a transparent way in order to ensure that we better understand the expectations underpinning regulation and that regulation is founded in an understanding of the customer.

ESG governance

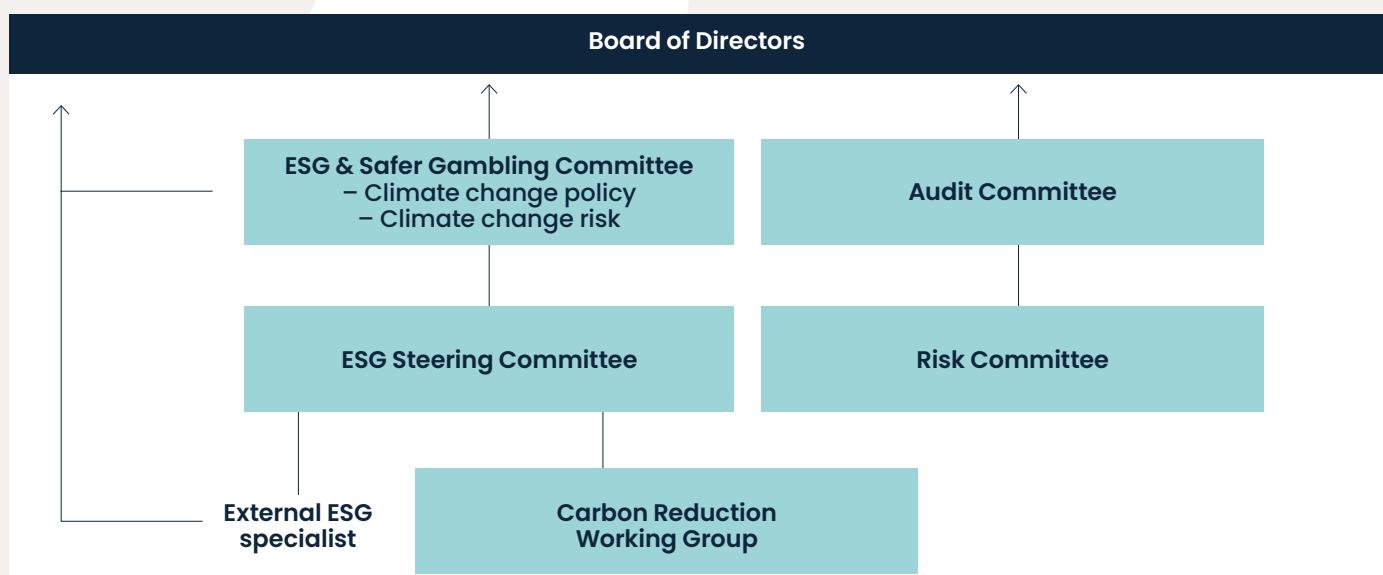
During the year under review, we have enhanced our governance framework by putting in place the necessary structure to ensure that we have effective independent oversight of our ESG-related operational focus. This has been supported by the development of the ESG strategy, informed by a robust study of our material ESG risks and opportunities in our business and integrated into our Group corporate objectives. This is not therefore a standalone area but a cohesive approach that sets out a progressive range of initiatives and performance measures to provide transparency on the management of issues most important to our stakeholders.

While the Board continues to have overall responsibility for the Group's ESG strategy, responsibilities are delegated to the ESG & Safer Gambling Committee, as set out in the Committee's Terms of Reference (for more information, please see the letter from the Chair of the ESG & Safer Gambling Committee on page 14). This includes overseeing the progress under each of the four ESG focus areas established this year: Customer Experience, Colleague Experience, Environmental Management and Community Engagement.

The Chair of the Committee keeps the Board apprised of the Group's ESG performance and any arising issues. The Group's Risk Committee also keeps informed of new or emerging ESG risks as they relate to the Group, and reports in to the Board.

At management level, in order to drive our ESG agenda and the initiatives throughout the business, we have set up a cross-disciplinary ESG Steering Committee, with representatives from each area of the business together with subject matter experts from across the Group. It is currently identifying a range of ESG-related data points and providing a gap analysis related to our management of material risks and opportunities. The ESG Steering Committee is informed of ESG issues through multiple channels including webinars, publications and ongoing advisory from ESG corporate advisors. The ESG Steering Committee reports into the ESG & Safer Gambling Committee.

As our approach to ESG management continues to mature, our governance of ESG matters will become further embedded into the business.



Regulatory environment

Rank principally operates in the UK and Spain. Our operating environment is defined, in part, by the laws and regulations laid down in each territory.

The legal framework for gambling in Great Britain, including the requirements for licensing gambling operators, is set out in the Gambling Act 2005 (as amended) ('2005 Act'). The Gambling Commission for Great Britain ('Commission') regulates commercial gambling and permits gambling on the basis that the licensing objectives to keep gambling safe, fair and crime-free, are met. Rank also holds operating licences in Alderney and Gibraltar and, in respect of its Spanish-facing operations, in Spain.

Jurisdiction	Regulatory body	Government department
UK	Gambling Commission	Department for Digital, Culture, Media and Sport
Spain	Comisión Nacional del Juego	Ministerio del Interior
Alderney	Alderney Gambling Control	States of Alderney
Gibraltar	Gibraltar Regulatory Authority	Financial Services and Gaming – HM Government of Gibraltar

All operating licences have specific reporting requirements, with which we comply.

In addition to holding operating licences, we hold licences in respect of each of our land-based venues from the relevant local licensing authority. Furthermore, individual licences are held by those in key management positions across all our Commission-licensed businesses (known as personal management licences) and specific gaming roles within our casinos (known as personal functional licences).

We always seek to build and maintain strong working and collaborative relationships with the regulator in each jurisdiction in which we operate, taking the approach of early notification of any potential compliance concerns and engaging with and responding to regulator consultations. We attend regulator workshops, key stakeholder meetings and regulator conferences at every opportunity.

We acknowledge that there is always room for improvement in our approach to compliance and review the effectiveness of our framework of compliance controls on a regular and ongoing basis. In doing so, we examine guidance issued by regulatory bodies and published as learnings for the gaming industry, as well as specific guidance and requirements for improvements issued to Rank following compliance assessments. During the year, this included improvements implemented further to the Commission's compliance assessment and licence review of

Rank Digital Gaming (Alderney) Limited (which used to operate our online Mecca and Grosvenor brands) in early 2021 (findings published in January 2022), in respect of which Rank agreed a regulatory settlement of £700,557.

Both the UK and Spain are member jurisdictions of the Financial Action Task Force ('FATF'), which sets international standards for anti-money laundering ('AML') and countering terrorist financing ('CTF'). At Rank we are committed to preventing gambling from being a source of crime and complying with AML regulation in the countries in which we operate.

We use AML models in our business to identify AML risks that might require enhanced scrutiny and/or ongoing monitoring and checks. The models profile players based on demographic data, regardless of their financial transactions. It enables identification of customers whose expenditure is exceeding expected levels and triggers a review.

We also have in place 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.

Regulatory compliance

Engage within the industry

UK trade association meetings attendance

100% (8 meetings)

2021: 100% (7 meetings)

Contributions to consultations impacting Rank



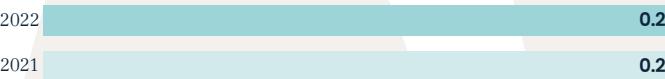
Maintain compliance

Number of Personal Management Licence holders

501

Prevent money laundering

Number of hours per employee who undertake anti-money laundering training



Legislative change

Review of gambling legislation in the UK

Gambling Act review

The Government's review of the 2005 Act aims to ensure gambling regulation is fit for the digital age. The review focuses heavily on online regulation but, encouragingly, it also recognises the need to ensure that the regulation of land-based gambling is appropriate for today's consumer and equitable relative to online regulations. Its Call for Evidence was launched in December 2020 and Rank submitted a detailed response, in addition to supporting responses from trade associations. Since then Rank has facilitated casino visits by MPs and engaged with Ministers and MPs to inform Government on the industry and why reform in the land-based casino and bingo sectors is needed.

In terms of what the new legislation could mean for Rank:

- Regarding its UK land-based operations, Rank is the UK's biggest casino operator in the UK with 52 casinos under the Grosvenor brand. One of these casinos – in Luton – is licensed under the 2005 Act. Our other 51 casinos are all licensed by the 1968 Gaming Act ('1968 Act') – legislation that is now over half a century old. Our evidence submission relating to legislative change for the casino sector is underpinned by the following: firstly, a clear commitment to player protection in line with the Government's objectives; secondly, to the pressing need to provide modern-day customers with experiences that meet their needs and expectations; and thirdly, the need to preserve and re-grow employment and stimulate investment in new and enhanced venues. Further to this, Rank is seeking harmonisation of the 1968 Act and the 2005 Act relating to casinos, specifically the ability to provide a more appropriate level of gaming machines across its 51 casinos licensed by the 1968 Act.
- For our bingo venues business, Rank is looking to seek a removal of the restriction surrounding the number of Category B3 machines permitted in each bingo venue along with certain other constraints which should result in product innovation and therefore a better experience for our Mecca customers.
- For our digital business, the political debate continues around player protection checks and we remain engaged and informed on developments through our own efforts and via the industry trade association.



Other regulatory change

In the last 12 months the Commission has published its consultation responses on three areas: Remote Customer Interaction, Regulatory Panel Reform, and Licensing, Compliance and Enforcement Policy. In particular, under its conclusion to the customer interaction consultation, the Commission moved to implement minimum player protection standards that will be considered by the Government as part of the ongoing review referenced above. It also determined that new requirements to ensure that online gambling businesses do more to identify and take a more tailored approach to customer interactions to further protect customers at risk of harm, published as guidance in June 2022, must be implemented in September 2022.

During the 2021/22 financial year, we were also required to implement new remote technical standards requirements that came into force in October 2021 in relation to display of transactions, auto-play functionality, time requirements and reality checks and responsible product design.

Review of gambling legislation in Gibraltar

In June 2022, a consultation was launched in relation to replacing Gibraltar's Gambling Act 2005 with new legislation that will include, amongst other things, a requirement for licensees to have "sufficient substantive presence" in Gibraltar and meet certain other new threshold criteria relating to conduct, suitability of owners, responsible gambling and prevention of crime. The consultation period ends on 30 September 2022, with a Bill to be introduced in Parliament thereafter.

Legislative update in Spain

The key provisions of Spain's Royal Decree on the Commercial Communications of Gambling Activities, banning sponsorship deals and restricting advertising on TV and radio, came into force on 1 May 2021. However, the Supreme Court in Spain has raised a question on the constitutionality of the law that serves as the basis for the Royal Decree to the Constitutional Court. A further Royal Decree on safer gambling is anticipated to be approved later this year, which will focus primarily on providing the players with additional responsible gambling tools.

In July 2021 a new Act was passed on measures to prevent and fight tax fraud, which limits cash payments in Spanish venues.



Industry associations and accreditations

We are members of several industry associations and believe it is important for leading companies within the sector to share knowledge and information and drive the conversation for self-regulation and customer safety. As members of The Betting and Gaming Council, which is the standards body for regulating UK betting and gaming, we support and drive forward best practice in our industry. The Bingo Association is the trade association for all licensed bingo operators in Great Britain, and as a member, Rank has the opportunity to help shape the agenda and drive progress in this sector. We are also members of Jdigital, Spain's online gambling trade association.

To demonstrate our commitment towards the highest standards of safer gambling, Rank is working with GamCare to obtain a safer gambling accreditation for all its UK-facing businesses. The GamCare Safer Gambling Standard is an independent quality standard that assesses the measures businesses have put in place to protect customers from experiencing gambling-related harm. Rank makes financial contributions to GambleAware in support of research, education and treatment of problem gambling.

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.

Industry body focus



Miles Baron of the Bingo Association ('BA') provides an understanding of how Rank participates in the UK bingo sector.

Q.
How is Mecca involved in the Bingo Association?

A.

The BA is the trade association for all licensed bingo operators in Great Britain. We look after the interests of our members by interacting with the government, regulator, press and any other key industry stakeholders when appropriate to do so. Mecca is our second largest member and has a keen interest in – and is an important voice regarding – our approach. Mecca holds a Board position on the BA Executive Council, as well as contributing significantly to the BA Compliance Committee, comprised of industry compliance professionals.

Q.
How does the Bingo Association aid best practice in the industry?

A.

The BA's services include facilitating age verification checks and managing the Bingo Industry Self-Exclusion Scheme ('BISES') on behalf of the industry. We have a Code of Conduct for Social Responsibility for the industry – to which Mecca is a signatory – that covers anti-money laundering protocols and protection of player funds, amongst other commitments.

We also provide advice through the Operators' Handbook on how to remain compliant with licensing objectives and regulatory obligations. The BA runs training courses for Association members on areas such as Social Responsibility and Customer Interactions. The BA also submits responses to consultations from Government or the regulator regarding changes to primary legislation or Licence Conditions and Codes of Practice ('LCCP') on behalf of the industry.

Q.
How is Mecca supporting its industry?

A.

Mecca has been proactive in sharing its knowledge and expertise; whenever any government consultations are released, Mecca contributes towards developing an industry response. The Company has lent its full support to the bespoke training courses developed to help employees engage and support the few customers that might have a problem with their bingo play. We regularly conduct industry research, particularly examining the incidence of problem gambling in bingo, that is jointly funded across the industry, and Mecca has been highly supportive.

The BA Executive Council has three meetings a year as well as an annual general meeting. The BA Compliance Committee meets every two months to share best practice and consider regulatory affairs. Outside of this formal calendar, we host a number of networking events for members to get together. Mecca is an active participant in all of these meetings and events and provides valuable input and support.

Mecca contributes to the Bingo Association's partner charity, Variety, the Children's Charity, which is on target to raise £2m in five years for special needs schools and their pupils located within our local communities.

“Mecca has been proactive in sharing its knowledge and expertise; whenever any government consultations are released, Mecca contributes towards developing an industry response.”

Industry body focus



Brigid Simmons of the BGC provides some insight to the purpose of the Council and Rank's contributions.

Q.
What do you see the role of The Betting and Gaming Council being?

A.

What we are clearly about is setting standards for our members. I think it's the responsibility of the industry to take all appropriate measures to prevent harm to vulnerable people so that customers can have a safe and enjoyable experience. We have also cultivated a feeling of responsibility among all our members for donating to GambleAware (who provide Research, Education and Treatment funding to the Third Sector) and that is something I feel quite strongly about.

Q.
What initiatives has the Council driven?

A.

We introduced the rule that 20% of advertisements on television or radio had to be related to safer gambling, which has been broadly welcomed. We replaced the inherited slogan 'when the fun stops, stop', with 'take time to think'. We put in place a code concerning VIP customers, stipulating that a personal licence holder must sign off on high value customers and a director of the relevant licensed operator must be responsible for this.

Q.
How is Rank supporting the Council?

A.

Rank's CEO, John O'Reilly, is a big supporter and as an organisation Rank is very engaged with us in everything we do, participating on several committees and sharing knowledge and expertise. From a human resources perspective, we are very much focused on recruitment in the industry; Rank is one of companies involved with our recruitment pilot where we are working alongside job centres and the Department for Work and Pensions to tackle perceptions about the gambling industry.

Customers

Our purpose is to provide an entertaining and exciting experience for our customers, and we are continually engaging and listening to feedback in order to deliver products and services to best suit our customers. Millions of people regularly enjoy the fun and excitement of gambling as an entertaining leisure activity. However, we also recognise that a small percentage can be at risk of problem gambling. Where such harm is suffered it can be devastating and accordingly, we have a responsibility to seek to minimise the risk of its occurrence.



Safer gambling

A commitment to customer safety and promoting responsible gaming is intrinsic to everything we do. Through advocating an understanding of responsible play, providing a range of robust safer gambling tools, utilising technology to identify 'at risk' customers, and cultivating a culture of awareness and increased colleague confidence to interact with our customers, we are well placed to fulfil this commitment.

As every customer is different, there is no one-size-fits-all approach to identifying 'at risk' play. We employ a wide range of safer gambling measures to identify any issues at the earliest possible opportunity. Assessment and improvement of these measures is ongoing as we respond to developments in technology and customer understanding, as well as new legislation and regulation. However, the most effective means of preventing harm and ensuring a positive experience is through empowering our customers. By providing access to safer gambling tools and educating customers about responsible play, we are equipping our customers with the understanding to use our products and services safely.

Safer gambling messaging

Commensurate with our commitment to keeping our customers safe, safer gambling messaging is incorporated into our operations and communications. Our dedicated responsible gambling website, Keep It Fun (<https://keepitfun.rank.com/>), provides a hub for advice and information on safer gambling tools available to UK customers, and the Keep It Fun messaging appears on all our communications as standard. We are keen that this messaging is ubiquitous so that customers can easily access support should it be required.

Within our UK venues, safer gambling messaging is continually visible. We have resources on the casino floors and in bingo halls, display responsible gambling signage, and promote safer gambling on our media screens. We also have resources in the back offices of our venues to ensure that our employees remain cognisant of our commitment to safer gambling and are able to quickly access safer gambling materials.

In our UK digital business, all customer communications contain a link to safer gambling information and we also provide customers with a link to safer gambling information from every page a customer can access on our sites. We have introduced a new welcome journey for all new registering customers within which they receive a safer gambling message that focuses on what measures we put in place and the mechanisms players can use to protect themselves. We have also developed 'How To' material for our website to provide another access point for safer gambling tools and continue to review website navigation to further increase ease of accessibility from the point of registration.



In our Spanish venues, safer gambling messaging can be found on all slot machines and on posters. We also ensure that leaflets/posters are displayed and available in employee areas of the venues, to remind colleagues of our commitment to safer gambling and provide easy access to materials and information. In our Spanish digital businesses, all sites have a safer gambling page with advice and information on safer gambling and links to support organisations. Customer communications and marketing include links to our safer gambling page and the national self-exclusion scheme.

Detecting customers who may be at risk of experiencing harm

We are continually assessing and improving the safer gambling measures we have in place with the objective of minimising the risk of gambling-related harm. The proportion of individuals that display problem gambling behaviours is very small, and we strive to identify these individuals and focus our efforts on providing them with the support they require, whilst at the same time seek to provide a seamless user journey for our customers. The approach that we take inevitably varies by channel and also by jurisdiction.

Data models

We have invested extensively in developing data models to assist in identifying potentially 'at risk' customers.

Markers of Harm model (UK digital)

We currently utilise a predictive model to identify potential 'at risk' customers, but have commenced roll out of a new, updated 'Markers of Harm' model. This uses demographic, transactional and behavioural data, and known markers of harm to assess customers. It enables us to identify those customers for whom an early intervention may be appropriate and approach such intervention in a more tailored and personalised way. The new model also takes account of recent updates to the Commission's Remote Customer Interaction Guidance, due to come into effect on 12 September 2022.

If intervention is deemed necessary, our specialist safer gambling team is trained to monitor customer play and will seek to interact as appropriate. Customer profiles are constantly updated based on the information arising from the model, monitoring and elsewhere, and they are reviewed to inform the appropriate action to safeguard the customer.

Affordability assessments (UK digital)

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

Risk matrix (Grosvenor venues)

For customers playing in our Grosvenor venues, we have developed a holistic risk matrix to better identify potential 'at risk' play and to assess a customer's level of affordability. The matrix was trialled in mid-2021, then rolled out in October 2021 to all venues. We assess players' spend in relation to their income (known or estimated), their number of visits and corresponding expenditure, their patterns of play, and how much they have spent in the last 90 days versus the 90 days prior. A report from the matrix is published daily to each venue.

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

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 process applying if a customer wishes to increase it. Amongst other things, regulations also impose a requirement for customers to set time and loss limits for each gaming session.

Monitoring

Digital (UK)

Our 24/7 live monitoring system, Hawkeye, enables us to oversee digital play in real time. Our agents assess numerous behaviours including play, session length, and velocity of play, and flag customers where a material change in their pattern of play is observed. We continue to evaluate and develop this system. By automating more of our safer gambling processes and improving the sophistication of these tools so that they are increasingly accurate, we are able to devote more time to supporting 'at risk' customers.

Venues

In all our venues we have trained colleagues that have the ability to observe customer behaviour first-hand for signs of problem gambling; they also know their customers from face-to-face interactions and day-to-day provision of customer services. They use their insight and personal knowledge of customers, together with the other data provided to them by our models (as mentioned above), in order to determine if an interaction is required. Team members will check on the customer's wellbeing and query their comfort with the level of gambling at which they are playing.

We also utilise technology to assist us in determining if an action is required. For example, in Grosvenor venues we can monitor machine play in real time and in Mecca venues we can track customer spend on the electronic bingo ('Max') tablets. We have also invested in Playsafe, a new machine management system that is in the process of being rolled out across our Mecca estate, which will enable B3 machine play to be monitored in real time.

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.



Safer gambling tools available to customers



In addition to the tools that we deploy to identify those customers who may require support and whom to interact when appropriate, we also provide tools to help our customers remain in control of their play and reduce the risk of harm.

Setting limits

Digital (UK)

In digital, we openly encourage our customers to set a deposit limit to manage the amount of money that they can deposit into a digital account. Limits can be set for a 24 hour, 7 day or 30 day period. Customers must wait 24 hours before a deposit limit can be increased. We also help customers manage the amount of time they spend playing online by offering a Reality Check alert on an account. Once set, a pop-up alert will be displayed as a reminder that the customer has been logged into their account for the specified period of time. For those customers who decide that setting limits is not doing enough to control their play, they can block access to their account for anything from one day to up to six weeks by means of our 'Take a Break' tool.

Venues (UK)

Customers themselves can apply machine loss and time limits at slots and electronic roulette machines in our Grosvenor venues, B3 gaming machines (£2 maximum stake, £500 maximum win machines, which account for nearly 80% of Mecca's machine revenue) within the Mecca estate, and deposit alerts on Mecca Max electronic touch screen tablets. When a customer reaches a self-set machine spend, the customer is alerted accordingly and a notification is sent to a dedicated mobile handset carried by the relevant venue's manager, who can then assess and determine whether a formal interaction with the customer is necessary. Mecca's Max tablets also offer customers the opportunity to take a break from playing, but not to self-exclude from Mecca completely, a useful tool to enable a customer to further control their spend whilst also continuing to enjoy the social aspect of the bingo club.

Customer-led self-exclusion

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

To support a customer that has self-excluded, their status will be updated automatically on our marketing system which will suppress all communications to that customer. The process of re-joining 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 (as well as, in the case of venues customers, the views of local management) before determining whether reinstatement is the appropriate decision for both the customer and Rank.

Other means of customer self-exclusion

Customers are also able to self-exclude by means of national schemes in Great Britain and Spain. These are GAMSTOP in respect of digital ([link](#)), SENSE in respect of land-based casinos ([link](#)), BISES in respect of land-based bingo ([link](#)) and RGIAJ (as well as local City council schemes) in respect of Spain. These programmes offer the ability for customers to self-exclude from all regulated operators in Great Britain and Spain. Customers may sign-up online or, in the case of SENSE and BISES, in-venue. Rank runs regular checks against the databases held by the providers of these national schemes to ensure that it implements self-exclusions that have been put in place this way.

As mentioned above, we direct our customers to our Keep it Fun website, which acts as a hub for safer gambling information. The website includes details of these national self-exclusion schemes.

"For those customers who decide that setting limits is not doing enough to control their play, they can block access to their account for anything from one day to up to six weeks by means of our 'Take a Break' tool."

Employee training



Having the right tools in place to promote and enable safer gambling forms only part of our approach. To ensure these tools are used to best effect, it is imperative our employees are equipped with the skills and understanding to support customers and intervene when necessary. Every employee must complete mandatory safer gambling training on an annual basis, with progress being monitored through our online platform. Additional training is provided as required or according to a particular role's needs.

In the past year we have invested significantly in additional safer gambling training for our colleagues. In partnership with GamCare, the leading charity in our sector for support with problem gambling, we are currently delivering training to over 1,100 employees to build upon their existing knowledge and skills.

The Gold Level training is a one-day intermediate level course which aims to significantly increase the number of our colleagues who have ability to spot markers of harm, initiate the first interactions, signpost support, and judge whether to pass customers on to more skilled colleagues. The training is being delivered to customer service teams, such as Bingo Chat Hosts, Duty Managers and Cashiers, as individuals in these roles are best placed to recognise differences in patterns of play.

The Platinum Level training is an advanced two-day course pitched at deepening the understanding of those who already initiate and record safer gambling interactions or those who lead teams that do this. Participants are 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 and then supporting them in understanding what that positive change may look like. The majority of people undertaking this training are Grosvenor venues colleagues, but Customer Verification Analysts, members of the High Value Customer teams, and Mecca General Managers, as well as colleagues in digital will also participate.

Our intention is to embed and enhance ownership of and accountability for promoting safe gambling behaviour. We are evaluating the impact of this training by seeking feedback from colleagues who have received the training and customers via our NPS survey going forwards. Initial feedback has been positive and has indicated that the skills being trained will be helpful in both customer and team interactions and should bring benefits to all line managers as well as those interacting with customers.

Safer gambling

Identify 'at risk' players

Number of safer gambling interactions (UK digital)

2022	257,077
2021	444,239

Equip our employees with safer gambling understanding

Number of hours per employee who undertake safer gambling training (% of colleagues that undertook safer gambling training during the year)

2022	2.4 (98%)
2021	2.1 (97%)

“For our colleagues, it’s about having the confidence and experience to deliver the right solutions for customers when it comes to safe and responsible gambling.”

Adele Farrell
Group Director of Compliance

Preventing underage play and protecting vulnerable customers

At Rank, we pay particular attention to protecting our younger and more vulnerable customers from being harmed or exploited by gambling, in accordance with the Commission's Licence Conditions and Codes of Practice ('LCCP').

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

Rank does not supply facilities for gambling in such a way as to appeal particularly to children or young people, thus ensuring its environments do not reflect or associate with youth culture. We employ a range of measures to prevent underage play online and in our venues. Principally, our policy of registration at all Grosvenor venues limits the risk of under-18s entering the premises. We have supervisors and utilise IDScan technology at entrances to check identification as well as CCTV. In Mecca venues, we will 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 the individual's date of birth, and will take action when there are unlawful attempts to enter the premises. In addition, entry is refused in any circumstances where an adult is accompanied by a child or young person. As a means of providing reasonable assurance that we have effective policies and procedures to prevent underage gambling, Rank's UK casinos and bingo venues participate in collective mystery shopper programmes organised by the respective trade associations.

In Spain, compulsory verification is required to ensure that the entrance to gambling venues is forbidden to minors as well as any person registered at the Regulators' Registry of 'persons prohibited to entry in gambling establishments'. The data from the Registry is downloaded daily to ensure we are able to fulfil this requirement.

Rank requires that all colleagues understand their responsibilities 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.

This responsibility is not limited simply to day-to-day operations; for example Rank also bears this in mind in its approach to applying for new or variations to premises licences. By conducting local area risk assessments, we can ensure appropriate decision-making and effective risk mitigation for locations that might be close to schools, youth facilities or addiction treatment centres.

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

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

Prevent underage play and protect vulnerable customers

Protect young and vulnerable customers

% of customers who are under 25

	2022	2021
UK Venues	23%	21%
Digital UK	12%	12%
Spanish digital	8.4%	7.5%

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

2022	2%
2021	2%

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

2022	£402k
2021	£371k

Prevent underage play

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

2022	6
2021	1

Customer privacy and data security

At Rank we take responsibility for protecting our customers' privacy and keeping their data secure when they play with us. 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 other third parties. This is managed via appropriate tooling and processes, with broad alignment to ISO 27001 and enhanced requirements of other regulators including the Commission, the ICO and PCI-DSS regulations.

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, allowing them to provide impartial guidance and advice and also undertake compliance monitoring work. At the end of the 2020/21 financial year we undertook an initial assessment of our performance for benchmarking purposes against the Information Commissioner's Office's ('ICO') Accountability Framework. No particular areas of concern were flagged. However, in line with our focus on continuous improvement, we incorporated certain aspects into our data protection monitoring plan to ensure an appropriate ongoing level of scrutiny. We also reviewed our decision-making processes and documentation of data protection practices. The DPO reports on a monthly basis to the Risk Committee and other management committees within the business as required, and a report is produced for the Audit Committee twice a year or more frequently as required. Our Spanish business aligns to the same framework with local data protection officer representation and monthly reports being provided to the Group DPO.

We maintain clear accountability for data security at Rank. 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 Information Security. Their respective teams have expertise in data governance and architecture, data security, vulnerability management, Security Operations Centre ('SOC'), cyber security, security governance, ethical hacking and DevSecOps.

We employ a number of protection measures dependent on the level and type of security required. These include, but are not limited to, password management (complexity and frequency of change), multi-factor authentication, firewalls, encryption, role-based access controls, end point protection, intrusion detection/prevention, and employee education, and are all aligned with industry best practice.

Operating in a number of jurisdictions means we must comply with regulations of differing expectations. Our strategy is to work in accordance with a singular framework that sets the most stringent methodology, thereby streamlining compliance so far as possible whilst ensuring we are operating in line with industry best practice.

Maintain customer data privacy

Number of hours per employee who have undertaken data protection and security training (% of colleagues who have undertaken data security training)

2022	0.46 (92%)
2021	0.46 (91%)

Maintain IT security and continuity of platforms

Statutory report of personal data breach to the regulator

2022: Zero
2021: 1

To ensure the effectiveness of our systems we have regular audits and assessments. Vulnerability audits are carried out on a monthly basis, audits for the Commission and our PCI-DSS compliance are carried out on an annual basis, and internal audits are carried out on a project and risk basis. We have formal risk-assessment programmes and tooling with scoring processes built around them to suitably advise the Group's Risk Committee. Risk registers are reviewed regularly, with risk acceptance, and mitigations monitored and updated as required. The lifecycle of the Risk Register means that emerging risks are identified and prioritised alongside existing risk mitigation actions and areas of improvement.

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

All employees are required to abide by policies and procedures that relate to the key data protection principles of user rights, data retention, data sharing and security; they are reviewed regularly to ensure they align with changes in regulation. We also require colleagues to complete a compulsory information security induction as well as annual data protection and information security refresher training, with further bespoke training on data protection by design and default being provided to colleagues responsible for product development. In addition, awareness campaigns based on localities are in place, such as office-based posters reminding 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.

Product safety and quality

For Rank, our focus on product safety and quality means ensuring fairness of play. Customers are not going to play on machines if they are not fair. Failing to ensure product safety and quality can also have regulatory consequences.

Regulation of products

The Gambling Act 2005 gives the Commission, as part of its statutory role, the power to attach conditions to operating licences about equipment used in connection with gambling activities in Great Britain. Appropriate conditions are attached to non-remote (venues) and ancillary remote (digital) bingo and casino operating licences, setting out requirements relating to, for example, live roulette wheels and bingo tickets. The gaming machines that we use are also required to comply with specific UKGC gaming machine technical standards, which relate to game features, display notices and general machine operation. The requirements vary according to the specific gaming machine concerned.

In addition, the Commission has set technical standards for remote gambling systems (including software) (its “Remote Gambling and Software Technical Standards” (“RTS”)) that detail the specific technical standards and the security requirements that licensed remote gambling operators and gambling software operators need to meet. These are updated from time to time, for example new requirements came into effect on 31 October 2021 in relation to display of transactions, auto-play functionality, time requirements and reality checks and responsible product design.

Rank is required to source its gambling equipment and software for its UK-based casinos, bingo venues and online sites from companies licensed by the Commission. Manufacturers are required to have all their equipment and software tested and certified by independent test houses approved by the Commission and Rank does not engage with third parties that do not provide compliant and tested/approved products. It is part of Rank’s procurement process that any new suppliers are appropriately licensed to manufacture and provide the gambling equipment to the required standards and comply with all relevant regulatory requirements.

Ensure fairness for our customer

Number of reported incidents of game faults to the regulator (UK operations)

2022	14
2021	3

More detail on some of those regulatory requirements is set out below:

- **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** – 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 machine technical, gambling software, and remote operating licence holders must comply with technical standards and requirements set out by the Commission relating to the timing and procedures for testing.
- **Games test reports (remote gambling and gambling software)** – A key requirement of the 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 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 Commission. Games testing must be carried out by an approved Test House.

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

“Rank is required to source its gambling equipment and software for its UK-based casinos, bingo venues and online sites from companies licensed by the Commission. Manufacturers are required to have all their equipment and software tested and certified by independent test houses approved by the Commission and Rank does not engage with third parties that do not provide compliant and tested/approved products.”

Product performance



It is important to us to know, as quickly as possible, if there are any issues with the performance of our products and to resolve them. We have a programme of work, which varies by product, by which we monitor and receive reports on performance and take active steps to maintain performance levels.

Digital games

The Return to Player ('RTP') rate is monitored on a daily basis across our digital brands. For each game, we assess the expected levels of performance across a number of rounds, as there will be variance in the RTP. This enables us to understand the bounds within which a game should be performing. Therefore, we can quickly identify if a game is performing within the expected levels, or if the RTP is consistently or significantly outside the usual levels, indicating a potential defect in the game.

This ongoing performance reporting also informs our longer-term strategy in the types of game we want to bring on board and the suppliers we want to work with. We are continuing to mature and advance our monitoring processes; we are currently working on a dashboard that will automatically flag games to us on this basis and will also enable a deep dive into site and player level, rather than just observing the RTP rate of the game across brands.



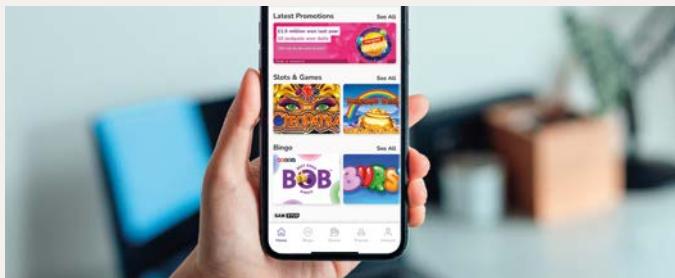
In-venue games

To ensure each roulette wheel is operating fairly and correctly, we clean and balance the wheels daily, conduct weekly drop zone tests, utilise Wheel Management Software to analyse data from games to ensure the equipment is balanced and without bias, and the wheels are certified by the supplier. All balls are purchased from a nominated supplier, stored securely and checked by our Gaming Teams. For table games, shuffle machines are cleaned and checked weekly. We check the front and back of playing cards daily to ensure they are in good condition and make sure all cards are present at the start of a gaming session.

Operating standards for all hardware are in place for Mecca and Grosvenor to eliminate faults such as broken buttons or faults in machines. Our physical gaming machines have fault logging to highlight and measure any product quality issues. We also have daily slots reports which can highlight 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. As with digital, the performance of machines and other equipment in venues informs our longer-term strategy in the types of products and machines that we want to bring on board and the suppliers with whom we want to work.

All table games are supervised and all games in the venues are monitored by CCTV and the footage reviewed on an ad hoc or as needed basis. Win percentages are reviewed regularly to monitor performance.

Similar procedures and testing is completed in respect of machines in our Spanish venues.



Ethical marketing

When advertising our products, our sole intention is to reach our intended audience, to enable those who are permitted to gamble with us to know about our products and offers and decide if they wish to play with us. We consider the appropriate level of marketing to deliver to our existing customers and the means by which it is delivered, taking a tailored approach rather than producing a high volume of communications. We also follow strict processes to prevent marketing communications from being received by vulnerable groups or persons who have self-excluded. We are constantly evaluating the content of our messaging, ensuring that it aligns with our values as a business and our approach to safer gambling.

Compliance of advertising

In order to advertise gambling products in the UK, all operators must comply with the relevant consumer protection laws, licensing requirements and the Advertising Standards Authority Codes. Amongst other things, these require that advertising is not targeted at under 18s or other vulnerable people, does not glamourise gambling or suggest gambling can be a solution to financial concerns or provide a solution for loneliness. As a member of the BGC, we also comply with the BGC Code for Socially Responsible Advertising.

In order to ensure compliance, promotional materials are reviewed by our Compliance Team to assess the tone of the advertisement and ensure we are not contravening any legislation. All broadcast advertisements are also reviewed to make sure they are compliant ahead of submission to Clearcast, a non-governmental organisation that pre-approves most television advertising in the UK (for more details please visit the Clearcast website (<https://clearcast.co.uk/>)). We work with affiliates who conduct advertising on our behalf. All affiliates are subject to due diligence when they are onboarded and are required to comply with our terms and conditions (which include a requirement to comply with all applicable laws and regulations) and approval processes and we continue to enhance our approach to monitoring their activity to ensure compliance.

In Spain, the Spanish Royal Decree 958/2020 regulates online gambling promotions and advertising. In addition to the wider provisions of the Gambling Act 13/2011, one of the aims of the Royal Decree is to protect children from underage gambling. It provides 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. Promotional bonuses for new customers are not permitted and advertising on TV and radio is restricted. Rank adheres to such rules.

Safer gambling and advertising

It is important that our safer gambling approach is interwoven into the customer journey right from the outset. We are therefore committed to having consistent and effective safer gambling messaging when we market our products. In the UK, in compliance with BGC commitments, and in addition to the safer gambling messaging required to be included in all advertisements, 20% of our 'above the line' media expenditure in the UK is reserved for safer gambling messaging.

To keep our customers safe, we suppress any marketing communications to those customers who have self-excluded.

For UK online and in-person casino and bingo players, we know that safety and security factor as one of the most important attributes when choosing between brands. Our brand tracker insights show that for both Mecca and Grosvenor, digital and venues, this was one of our most highly recognised attributes. Of the 10 brands assessed in the tracker, Mecca and Grosvenor consistently came second or third for the level of trust players had in the brands.

Market our products ethically

Total spend on safer gambling adverts

2022	£1.0m
2021	£0.6m

Upheld breaches of advertising codes

2022	1
2021	0



Health and safety

While physical health and safety risk is not the most material issue in our wider industry, as an operator with 125 venues in the UK and Spain, we treat the health and safety of our customers and colleagues as high priority and are committed to achieving the highest level of standards and ongoing improvement across the Group.

The General Managers of each of our venues are responsible for ensuring that their respective venue's operations meet the requisite standards and a check and balance is provided in the UK by the dedicated health and safety team conducting regular health and safety and fire risk assessments for each venue. Results are circulated to the relevant venue's leadership team, completion of resulting actions is monitored and any significant issues are escalated and followed up by management teams, with the assistance of specialist external consultants where needed. The health and safety team also works closely with the property and maintenance team in the UK to ensure that ongoing health and safety-related projects are completed in a timely manner. The impact of the pandemic meant that it was essential that we provided additional assurance to customers and colleagues alike of the safety of our venues, in line with applicable regulations but also taking account of feedback received from our customers and colleagues. We continue to review our risk assessments accordingly. The current risk assessments for Grosvenor, Mecca and support offices can be found on our website www.rank.com/en/responsibility/covid-19.html.

Our Head of Health and Safety reports on a monthly basis to the Risk Committee and the senior leadership teams of each of Rank's businesses, providing updates on trends and data on, amongst other things, accidents, near misses and other incidents such as robberies and fires. A report is also produced for the Audit Committee twice a year or more frequently as required. Our Spanish business aligns to the same framework with local health and safety accountability and monthly reports being provided to the Head of Health and Safety.

Keep customers and employees safe

Number of accidents (UK venues)

2022	1,130
2021	383

Number of accidents reported under RIDDOR (UK venues)

2022	2
2021	2

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

2022	5,669
2021	4,300

Customer service



Our customer service aspiration is to provide support to our customers as and when they require it in a friendly, efficient and effective manner. In order to achieve this, we focus on building relationships and seeking to understand what our customers' needs are when they visit us in venue or online. Through a variety of channels, we engage to establish customer preferences, gather feedback, and resolve any issues that may arise.

One of the main ways in which we obtain feedback is by sending three short questions to customers following a customer service interaction (as appropriate, depending on the nature of the interaction), which include asking their willingness to recommend our products and services (the Net Promoter Score or 'NPS'). We also enquire whether their query was resolved and include a free form text box for respondents to include more information; we use text analysis to develop this information into usable data. Insights from the feedback gathered are shared with the relevant teams internally in order to drive continuous improvement

Engage with customers

Mecca Venues net promoter score

61% (-3ppts)

2021: 64%.

Grosvenor Venues net promoter score

57% (+4ppts)

2021: 53%.

Enracha Venues net promoter score

45% (+9ppts)

2021: 36%.

Customer complaints to Directors' Resolution Office (UK operations)

2022	79
2021	104

Colleagues

In order to deliver exciting and entertaining experiences, we require a workforce of engaged, motivated and skilled employees. As such we are committed to providing training and support to our colleagues and that they are given the opportunity to develop and progress through the Group whilst themselves experiencing a safe and fun working environment.

About Rank

Governance

Customers

Colleagues

Environment

Community

Appendix



Leadership capability



Our Board and Executive Team members are required to lead from the front to drive the business forwards and deliver on the long-term strategy. As such, we make sure that all our leaders have the appropriate knowledge and skills to deliver against Rank's objectives and we employ succession planning to ensure the continuity of capability in key roles.

At a Board level, there is an annual review of skills, knowledge and experience, and this review also feeds into the succession planning discussions that take place at Nominations Committee meetings. This year's review led to a process resulting in the appointment of Lucinda Charles-Jones as a new independent Non-Executive Director (more information on this appointment is set out in the Annual Report & Accounts). Board members complete the same mandatory training as colleagues (see below), receive regular corporate governance and industry updates, and are encouraged to identify to the Company Secretary any other training needs.

Succession plans are maintained for the Board, Executive Committee and other senior leadership positions and were reviewed by the Nominations Committee during the year. The Committee welcomed the notable examples of succession planning in the promotion of Debbie Husband and Emma Morning to the Executive Committee. (An overview of this process from Debbie's own perspective can be found on page 36.) Other senior management promotions were to the roles of Chief Operating Officer for Grosvenor (please see page 37 for an interview with Marcin Zawada on his experience) and Director of Legal.

In order to further support the development of talent and future leaders, our leadership capability framework is now embedded into our Executive successor assessment. We are also incorporating data-led decision making into our succession planning conversations across the Group. This succession planning assessment and data-led approach feeds into the identification of talent and informs talent development, with executive coaching and leadership courses at universities and business schools available for identified individuals.

Develop our current and future leaders

Percentage of management roles on leadership training programmes

2022	28%
2021	7%

Employee training and development



Mandatory training

We maintain the highest standards in business ethics and all colleagues are required to complete compliance training to make sure that every individual in the Group is aware of our expectations for professional behaviour. This includes GDPR, anti-money laundering, anti-bribery, and health and safety training, as well as other training specific for the different areas of the business, which is provided through our e-learning platform or in-person. Colleagues are also made aware, on an ongoing basis, of Speaking Up, the Group's whistleblowing programme. This enables colleagues, suppliers and other stakeholders to raise issues regarding possible improprieties in confidence and, if they wish, anonymously. The programme offers multilingual communication channels operated by an independent service provider who submits reports to the allocated, appropriate individual within the business for investigation as necessary. Reports received are kept strictly confidential and the concerns identified referred to appropriate managers within the Group for investigation and resolution. The Board's Audit Committee receives an analysis of all reports submitted via the Speaking Up programme.

To ensure strong awareness across the Group, every individual at Rank must also complete mandatory safer gambling training, with progress being monitored through our online platform. While not every role will require the ability to recognise 'at risk' players or having the tools to hand to assist a customer, we feel it is essential that all colleagues understand the fundamentals of our safer gambling approach and how it is integral to everything we do in order to keep our customers safe. Additional training (often face-to-face) is provided as required on an ad hoc basis.

In order to strengthen this awareness and deepen the level of understanding, we commenced two additional programmes on safer gambling training in the 2021/22 financial year (see above for more information). The intermediate level is pitched at our colleagues who interact directly with customers, aiming at developing their understanding of problem gaming and enabling recognition of warning signs in players. The advanced level is being delivered to employees from across our brands to enable them to aid customers who have been identified as requiring support in changing their gambling behaviours.

Provide training and development opportunities

Number of training hours per employee

2022 13

2021 9

Number of colleagues who have been trained by Grosvenor to be licensed dealers¹

2022 440

2021 0

Number of apprenticeships started in the year

2022 75

2021 14

Number of hours of voluntary training completed²

2022 75,626

2021 7,823

General

Absenteeism rate

2022 Not available

2021 Not available

Voluntary colleague turnover rate (full time)

2022 40

2021 18

% of employees that are contracted or temporary staff

2022 2

2021 3

Total number of whistleblowing incidents reported and investigated

2022 8

2021 6

1. No training academy in 2021.

2. COVID-19 impacted 2021 figure.

Recruitment and development opportunities

In order to continue attracting the most talented individuals we are streamlining our recruitment process, making sure we are hiring the most qualified individuals from a diverse pool of candidates as quickly as possible. We are developing a new employee value proposition ('EVP'), Work. Win. Grow., which focuses on retention, creating exciting opportunities for our employees, and recruitment, attracting talented, energetic people to join our global team.

Apprenticeships are a key means through which we can attract more individuals into our business. A number of individuals at Rank joined as apprentices and have worked their way up to General Manager positions. This year we have supported more than 50 apprenticeships around the Group.

We offer opportunities for all employees to develop their skills and progress in their careers. Foremost, on our e-learning platform, we offer over 700 courses. These address both professional and personal skills, including setting development plans and changing thought processes. The platform is available to all employees, while certain individuals working with their managers on professional development plans may be recommended to complete specific courses.

Additionally, we support training opportunities on an individual basis, including mini MBAs, project management courses and other individual training requests. We have a formal process through which colleagues can apply for these opportunities. To support internal development and promotion, we identify high potential individuals to whom we provide more bespoke support.

In conducting a 'needs analysis' this year, we concluded that an area of improvement across the Group was team management skills. To address this, we piloted training for three levels of managers; 1st Line Management, Management@Rank, and Leading@Rank. The programmes were each three months' long, delivered through half day virtual workshops, focusing on management and leadership skills including interpersonal skills, emotional intelligence, and recruitment and retention. These sessions have been extremely well-received and demonstrate how enthusiastic our colleagues are to develop their expertise and progress in their careers.

"This for me was one of the most valuable (sessions) in the programme. The elements relating to delegation were really useful for me to revisit as I have seen these on previous courses but a great refresher."

Management training attendee



Interview with Debbie Husband, Grosvenor Venues Managing Director

Q.
How does Rank support its workforce and what has been your experience?

A.
I am very positive about the approach Rank takes to supporting its workforce and not just because it's been beneficial to me, but because I genuinely believe that it's something that we do extremely well.

When I joined the business just over four years ago as an Operations Director, there were two particular challenges for me: being a non-gaming expert and being a woman. It is a very specialist industry; there are only around 300 people in the UK who are personal licence holders and authorised to run a gambling venue, so it is niche, and I was entering that exclusive environment. However, from early on I felt really supported and experienced excellent interactions with Rank's leadership team. I felt that every effort was made to immerse me in the industry in the smoothest way and never felt that being female was a barrier to my progression at Rank.

Q.
How did the Company share the necessary knowledge for you to develop your capabilities?

A.
When I first joined Rank, I went to Las Vegas to enable me to really understand the world of gaming from a business and a customer perspective. It is one of the best things that I have done since joining the Company. Being able to be a player, observe player behaviours and the different nuances of gambling, alongside counsel from my more experienced peers on the workings of the industry I believe contributed strongly towards setting me up for success. It also demonstrated the need for us to really focus on understanding our customers in order to provide excellent customer service and products that continue to excite and entertain. I do think that practical training and understanding is very important in terms of knowledge development.

I think it is also important to share knowledge and learnings to develop and, in a business such as Rank, understand the wider context. When I became the National Director of Operations for Grosvenor I became a part of the leadership executive for the venues business, which gave me exposure to my peers within Mecca and more broadly across the Group, which I believe stood me in good stead to when I was appointed Grosvenor Venues Managing Director and to the Executive Committee.

It's about setting people up for success and the opportunities are there to help people achieve that.

Q.
What opportunities were made available to you?

A.
As National Director of Operations for Grosvenor, I took part in a number of internal events, chaired by our Group Human Resources Director and joined the Leading Stars forum, which gave me an opportunity to speak to colleagues around the business, and the Chief Executive, on a regular basis.

I was allocated a mentor, which allowed me to talk candidly about the business, the initiatives, the strategic direction, colleagues, and wellness engagement in a secure and confidential environment and receive feedback.

After being promoted to Managing Director, I was offered external coaching. A visiting professor, renowned for supporting high-performing professional women, meets with me every four weeks and acts as a valuable sounding board for the discussion of challenges and opportunities. Being able to define my own personal development objectives and identify the direction in which I wanted to progress, together with this support, has been invaluable.

We routinely support succession and promotion for General Managers and Regional Operations Manager and I have been able to promote a number of people from my team, using the same lens that the Company has applied to me. If people are talented, then my view is always that if you don't develop them, somebody else will. So I am extremely committed to enabling my team to progress and succeed.

Q.
What have been your proudest achievements?

A.
I am now responsible for the largest revenue arm of the business, which is something that I am immensely proud of. Because I am relatively ambitious, I want to do well and I want to work in an organisation where my value is recognised. At Rank, I feel that it is.

One of the most rewarding things for me has been promoting diversity and inclusion in the workplace. I chair the Wellness Committee, and that has now trained around 320 colleagues in mental health first aid, including myself. We participated in a four-day accredited course, and now have mental health first aid in every venue across the UK.

Q.
What does being valued mean to you?

A.
Rank have been committed to me. They've done a good many things to support my development and they have done it well. And that is so important. When you are putting in the hours and are dealing with at times complex situations, then you have got to feel valued. To me that means feeling that you are part of a team, able to have opportunities, are listened to and also have some fun along the way.



Interview with Marcin Zawada, Chief Operating Officer, Grosvenor Casinos

Q.
How were you supported in the transition to your current role?

A.
Previously to Rank, I worked at McKinsey, joining Rank in 2018 as a senior executive within the transformation team, with a focus on the international division. I then moved into the international COO role, before recently being appointed as COO for Grosvenor Casinos.

In moving into an operational role, I was provided with a personal development plan that was created to identify any gaps in my current skillset. To begin with there was a large degree of 'on-the-job' training and senior management mentoring. There were some internal training courses initially, but then the pandemic came along and the development programme was paused whilst the business went into survival mode. This was a training programme of its own.

On exiting lockdown, the development structure returned and I received a lot of coaching and regular check-ins from my managers, including a focus on identifying the future roles to which I might be suited and work towards holding in Rank and the additional skills development that I might require. This led to some very innovative ideas including a couple of courses at the Royal Academy of Dramatic Arts aimed at coaching business professionals who want to develop their presentational and public speaking skills. These were areas where I was not traditionally comfortable and so I felt hugely supported.

There was also external mentorship from an experienced industry sector CFO from the private equity world, giving me an excellent sounding board as I transitioned between different roles.

I was also able to design a lot of my development programme. Working with the HR team and mentor group we identified 10 to 15 courses that might provide the right support and selected the three that were most suitable from that list.

Having the opportunity to develop in this way really motivates me to want to give back to the Company by way of commitment and performance and I certainly feel recognised for my contribution in terms of the opportunities given to me.

Q.
How has your development manifested itself and benefited both you and the Company?

A.
A lot of it has to be around presentation. I feel stronger as a leader and a much more positive influence on the people within the team. I better understand the messages I need to deliver and the content that is appropriate for the right internal audiences in order to motivate them and improve performance.

I also manage work-life balance better and have improved my interactions with senior colleagues. I am a much more comfortable public speaker.

Q.
What is the next focus for you?

A.
I am looking at two specific areas. The first is to develop my technical expertise. Up until now, I have been more focused on the digital side of the business. But in my new role in venue operations, I recognise that there are entirely different challenges around, for example, customer experience and licensing.

I am also going to focus on getting a more in-depth understanding of cultural dynamics and hierarchies within the business. Every casino has a manager who is effectively running their own venue business. Both of these areas will require me to develop different leadership skills which I am really excited about.

I think my development should be built around my past experiences, current challenges and future ambitions. And all that is possible at Rank.

"This led to some very innovative ideas including a couple of courses at the Royal Academy of Dramatic Arts aimed at coaching business professionals who want to develop their presentational and public speaking skills."

Equality, diversity and inclusion



Creating a working environment that embodies equality, diversity and inclusion ('ED&I') is incredibly important at Rank. We have four stated aims:

1. Create an inclusive environment which facilitates our colleagues to develop, be creative and deliver exceptional service
2. Ensure there is a diverse workforce across all grades
3. Make inclusion and diversity integral to how we do business
4. Demonstrate leadership on inclusion and diversity, internally and externally, positioning Rank as an "employer of choice"

In order to deliver against these aims, we used the National Inclusion Standard "Six Es" (Engage, Equip, Empower, Embed, Evaluate, Evolve) to:

1: Create an inclusive environment which facilitates our colleagues to develop, be creative and deliver exceptional service

We have a variety of family support policies, including flexible working and enhanced maternity leave pay for women in leadership, management, or pathway into senior management roles, which seek to enhance the working lives of colleagues by offering alternative working patterns to help them strike a balance between their work and personal commitments. In reviewing our policies, we identified twelve core policies relevant to ED&I and shared these with an external Diversity and Inclusion specialist for review. We have since republished four out of the twelve policies, while eight are still under review and are expected to go live over the coming months.

In November 2021 we also launched our Menopause Policy which includes the offer of financial support for treatment and was supported by us becoming an accredited employer with the Menopause Workplace Pledge.

We are continually assessing how we can improve our approach to ensure all our colleagues feel supported and heard in their roles. Commensurate with this commitment, we will be looking to publish a new three-year ED&I strategy before the end of H1 2022/23.

2: Ensure there is a diverse workforce across all grades

We remain committed to the principle of equal opportunities and equal treatment for all colleagues, which includes paying individuals equally for the same work. We know that a diverse workforce that reflects our customers will help us:

- Attract and retain top talent;
- Improve the quality of our decision making;
- Increase innovation and customer insight;
- Increase colleague satisfaction; and
- Enhance our image and reputation as a responsible employer.

As individuals progress through our management structure, we have several initiatives in place to support under-represented groups, in particular women in senior positions, and to support them in developing their careers.

Further to our objective assessment of talent, we create personal development plans ('PDP's), which we review on a quarterly basis. To support the development outlined in the PDPs, we focus on the execution of many initiatives which includes the use of internal coaching and mentoring programmes, as well as courses delivered by external third parties.

The FTSE Women Leaders Review sets a target of 33% female representation at the Board, Executive Committee and Leadership team levels. The number of women at Rank has fluctuated across the year, as a result of new joiners, leavers and reporting line changes. However, at 2021/22 financial year end, 37.5% of the Board was female, 30.77% of the Executive Committee and 30% of management-level direct reports to the Executive Committee were also female. We note the new requirements from the Financial Conduct Authority that the Board should be looking to achieve 40% gender diversity and that at least one senior board position should be held by a female. The Board meets the latter requirement, following the appointment of Karen Whitworth as senior independent director in January 2022. The Board has continued to consistently meet the Parker Report target of one Director of Colour throughout the year, but nevertheless remains committed to increasing BAME representation on the Board and in senior roles.

Our analysis of data and feedback is essential to track progress, identify areas for improvement and measure the impact of initiatives we have delivered. For example, we have seen that our focus in this area is being positively received by colleagues, with a score of 81% for ED&I in the full year employee opinion survey ('EOS'). A further example can be seen in our analysis of applications for roles at Rank. We have focused on ensuring ED&I is embedded into our recruitment practices and over the course of the year, out of 63,435 applications for roles at Rank, 50% were from females and 30% were from ethnic minority backgrounds. Regarding internal promotions during the year, 40% were female and 14% were from ethnic minority backgrounds.

We are committed to improving our ED&I data set using quarterly communications campaigns to obtain key information on our colleagues and continue to track the progress of under-represented groups monthly.

3: Make inclusion and diversity integral to how we do business

Giving our colleagues the opportunity to express how they feel and tell us what they need is critical. To ensure that all colleagues have a voice, we further embedded our six ED&I colleague network groups: Wellbeing; Women; Racial Equality and Diversity; LGBT+; Families; and general ED&I (incorporating religious celebrations). Each group has an Executive sponsor, as well as a representative from each country and brand. Each group also has a Chair and Vice Chair to support the development and implementation of our approach to ED&I, including acting as and identifying role models for each of our initiatives. The groups meet at least twice a year.

Alongside this, we created a calendar of twelve ED&I events (two for each group) that aligned with national or international events and will be refreshed on an annual basis.

We want the impact these groups have to be meaningful. As such, we have linked up with six leading external ED&I partners: Inclusive Employers; INvolve; Women in Hospitality, Travel and Leisure ('WIHTL'); Corporate Research Forum ('CRF'); 55 Redefined; and Included. Each of these partners is actively engaging with members of our colleague network groups, providing external benchmarks, content and thought leadership.

We also ensured that specific ED&I questions were included in our EOS conducted in September 2021 (full survey) and May 2022 (high-level 'pulse' survey) to ensure that any action planning focuses on the positive changes that can be made to improve our position across all office locations. A key piece of feedback from the surveys was that, while employees felt that overall we are an inclusive and diverse organisation, more could be done around delivering ED&I events and promoting wellbeing. In response, we now have an ongoing programme of webinars delivered by external experts across many ED&I topics of potential interest to colleagues.

We continue to use #BeYourself (our programme of events to support our ED&I strategy) and Wellbeing@Rank (our colleague network for physical, mental and financial wellbeing initiatives) to engage all colleagues in ED&I activities across the business, including supporting specific events at international locations. As well as the six specific ED&I groups mentioned above, we hold Employee voice, Leading Stars and Talking Stars meetings which we use to gather feedback from colleagues on what we need to stop, start and continue when it comes to ED&I initiatives.

ED&I events

To raise awareness for and educate our colleagues about diversity and inclusion, we ran a series of ED&I events in the year. Each event was aligned to one of our colleague network groups and to an internationally recognised ED&I event e.g. International Women's Day. Activities hosted for these events included showcasing an LGBT+ inclusion training module for employees to learn about the community and how they can contribute to making an inclusive working environment and a series of webinars from speakers about experiences of either being a female in the workplace or supporting female colleagues.

4: Demonstrate leadership on inclusion and diversity, internally and externally, positioning Rank as an "employer of choice"

We support our colleagues with training and development and operate a High Performing Sponsorship Programme that is specifically focused on the development of female colleagues, ensuring that amongst other things they obtain exposure to relevant Executive Committee members. As part of this programme, we also focus on reverse mentoring, the purpose of which is to provide valuable insight on actual and perceived barriers to inclusion that can help inform policy and leadership decisions to senior leaders across our business.

We will also roll out an internal mentoring programme in the next Financial Year that will benefit the broader organisation.

We have considered, as part of embedding the colleague network groups referenced above, the further support that those involved in chairing and leading those groups may require. More broadly, our focus is on ensuring change in the workplace so that everyone has the opportunity to fulfil their potential and reach the very top of our business.

"A key piece of feedback from the surveys was that, while employees felt that overall we are an inclusive and diverse organisation, more could be done around delivering ED&I events and promoting wellbeing. In response, we now have an ongoing programme of webinars delivered by external experts across many ED&I topics of potential interest to colleagues."

Ensure we uphold equality, diversity and inclusivity

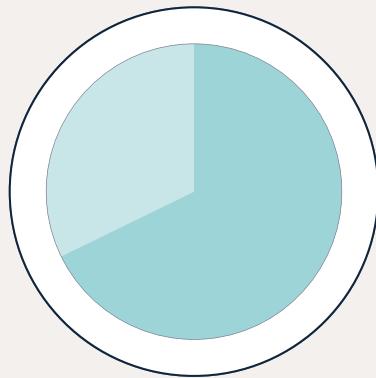
Male:female split of total Group

	2022		2021	
	Male	Female	Male	Female
Board	5	3	6	3
Senior management	51	19	45	17
Whole Group	3,952	3,618	3,910	3,611

Gender pay gap

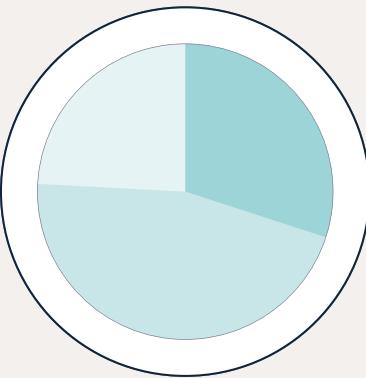
	2022	2021
Mean	30%	26%
Median	30%	21%

% of UK employees are White British



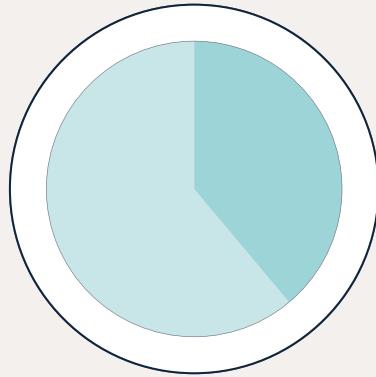
- White British **68%** (2021: 69%)
- Other **32%** (2021: 31%)

% of colleagues by age band



- <30 years old **30%** (2021: 28%)
- 30-50 years old **46%** (2021: 48%)
- >50 years old **24%** (2021: 24%)

% of employees who are part-time



- Part-time **39%** (2021: 41%)
- Full-time **61%** (2021: 59%)

% of colleagues by country

	2022		2021	
	Total	%	Total	%
UK	6,549	87%	6,515	87%
Spain	509	7%	567	8%
Mauritius	286	4%	254	3%
South Africa	79	1%	46	1%
Gibraltar	73	1%	63	1%
Malta	40	<1%	35	<1%
Israel	34	<1%	38	<1%

Employee engagement and wellbeing

Our industry is a truly exciting one in which to work. This resonates across the Group, with colleagues valuing the interesting nature of our business and the skilled roles we provide. Our business strategy is also well communicated to ensure that everyone understands and is working towards the same goals. Rank's culture is defined by its established values – service, teamwork, ambition, responsibility and solutions ('STARS') – and its purpose. From the point of recruitment, all colleagues are made aware of our values and these are incorporated into many development initiatives to ensure they are at the heart of a successful career at Rank. To ensure our workforce remains connected and motivated, we operate a number of initiatives to facilitate engagement with colleagues, to allow feedback and the articulation of any issues, and for business communications from the Executive.

Town Halls

Directors and senior management are actively involved in the engagement of colleagues through Town Halls, which are accessible to all our colleagues to watch and participate. Our Town Halls are also the forum in which STARS awards are presented, offering recognition of individuals and/or teams, having been nominated by their colleagues, for demonstrating Rank's values in their work.

Employee Voice

Employee Voice meetings are held biannually and enable elected representatives from different areas of the business to meet with members of the Executive Committee and senior management to discuss issues of concern raised from within the business and potential resolutions. Specific issues are elevated for discussion at the Executive Committee and/or Board encouraging a two-way dialogue and allowing explanations to be given about decision-making. The minutes from Employee Voice meetings are circulated across the business.

Talking STARS and Leading STARS

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

Employee Opinion Survey

To enable all colleagues to feedback directly to the business, we conduct employee opinion surveys twice a year. One is an in-depth survey comprising around 30 questions, covering all aspects of working at Rank (this year it took place in September 2021). The other is a high level 'pulse' survey that focuses on the key engagement drivers to act as a check on engagement and the progress being made across the Group (this took place in May 2022). The outputs of these surveys are shared with the Executive and Board and a series of actions are determined in response to the results.

Working environment

Our workplace environment was greatly affected by the pandemic. To ensure all our colleagues feel comfortable, managers have been conducting mental health check-ins with people returning to venues and offices. We have also introduced a range of activities and initiatives to make sure that our workplace is an enjoyable and supportive place to work. This includes offering massages, running yoga classes, providing breakfasts and lunches and arranging other social events, and inviting a psychotherapist to talk on mental health.

Direct Board engagement

We strongly believe that direct Board engagement with colleagues is invaluable. Our designated Non-Executive Director ('NED') attends the Talking STARS and Leading STARS forums. The role is to ensure that the views and concerns of the workforce are taken into account by our Board, particularly when they are making decisions that could affect the workforce. The designated NED also provides feedback to colleagues on such matters from the Board. This approach has encouraged a broader exchange of information and views on the business and the wider industry. The designated NED reports formally to the Board on matters discussed in such meetings on a biannual basis. We also conduct Board visits to venues, which allows colleagues to feedback directly on issues that matter to them, without comments having to pass through layers of the business, and for the Board members to see the direct operations of the business and the work of our dedicated colleagues.

Unions

We keep an open line of communications with relevant trade union bodies and we value maintaining a productive working relationship. We listen to the issues they raise on behalf of their members, respond to any concerns, and implement solutions where possible that support the wellbeing, safety and security of our people.

Wellbeing

The Wellbeing@Rank programme was launched in October 2021 to keep colleagues engaged, motivated, happy and healthy at work. Although still in its infancy, we've taken positive steps to invest time and resource in supporting colleagues physical and mental wellbeing.

Group-wide, we have provided monthly virtual 1-2-1 sessions with a psychotherapist, held several lunch and learn sessions over the year, and introduced The Weekly by PepTalk, which provides colleagues with a weekly 30-minute live interactive wellbeing talk, as well as the opportunity to catch up on demand. We are committed to ensuring there is ongoing support available to colleagues, across all locations.

As part of our Mental Health Awareness Week activities in May 2022, we held our first financial wellbeing session with The Money Charity and ran a webinar around supporting children's mental health with The Positive Parenting Project. In addition, we got our existing Mental Health First Aiders together to re-engage and refresh learning with them.

Maintain a motivated and engaged workforce

Employee engagement as a percentage

2022	68%
2021	65%

Number of Town Halls

2022	11
2021	13

Environment

As a Group, we recognise the importance of reducing our environmental impact and ensuring that we are operating as sustainably as possible. As part of our ESG strategy, we are currently mapping out our environmental commitments, assessing where carbon reduction measures can be implemented and how our venues can operate more efficiently.



Our approach

We are starting to incorporate ESG considerations into our due diligence processes, by requesting environmental policies from suppliers and including in our Requests for Proposal a requirement to support the Group's environmental agenda.

We have identified the following focus areas:

Energy usage

The most significant area of contribution to the Group's carbon footprint is our venues' energy usage. We are working with our energy consultants to determine where reduction opportunities lie and once the assessment is complete we will set a target to reflect these findings.

Furthermore, we aim to improve our monitoring of energy usage, by investigating energy spikes and understanding what measures could be taken to avoid unnecessary energy usage. We are exploring opportunities to incorporate renewables into our utility mix, and subsequently create energy and cost efficiencies.

Power capacity review

Our energy consultants, Consultus, are conducting a power capacity review of our properties. Of the 41 supplies approved for capacity reductions, 23 have been processed, 8 are in a queue to be processed, and 10 require re-analysis following confirmation of existing details. Once the project has concluded Consultus will issue a formal review to detail successful price reduction by venue.

Waste and water management

Rank is working with its suppliers and providers to assess our use of resources and evaluate where improvements can be made.

We are engaged in early stage conversations with our water provider, SES, as well as a water efficiency business, with the objective of reducing water consumption and surface water impact on our business.

We have asked our waste provider, Biffa, to revisit our Waste & Recycling Guide and update it to reflect our current waste consumption and subsequently outline appropriate measures for waste reduction. Biffa will be creating on-site collateral to instruct employees on waste segregation and thereby reduce waste to landfill, and we are considering further measures to raise awareness for recycling and best practice in waste management.



Travel and fleet management

The Group is looking at specific areas where it can reduce its environmental impact from travel and is working with consultants to consider a range of carbon reduction initiatives. As a result of the pandemic, remote working has changed our commuting practices. We will be reviewing our travel policy in order to ensure it is fit for purpose.

We are reviewing options to electrify our fleet. Rank has a fleet of around 20 vehicles which are in need of replacement and, as and when they come up for renewal, we will be purchasing electric vehicles ('EV') rather than internal combustion engine ('ICE') vehicles. This will not only result in a reduction in our carbon footprint, but also in costs for fuel.

We have also considered vehicle charging options and will explore this further in time in order to support this transition to EV. We have piloted the use of electric charging points at our Victoria casino and are looking into ways to roll out the scheme across our entire venues estate.

Managing our resources better

Better manage our resources

Amount of hazardous materials (tonnes)

2022	0.54
2021	1.31

Amount of non-recycled waste (tonnes)

2022	158
2021	124

Amount of recycled waste (tonnes)

2022	391
2021	1,009

Total water usage (m³)

2022	214,625
2021	209,259



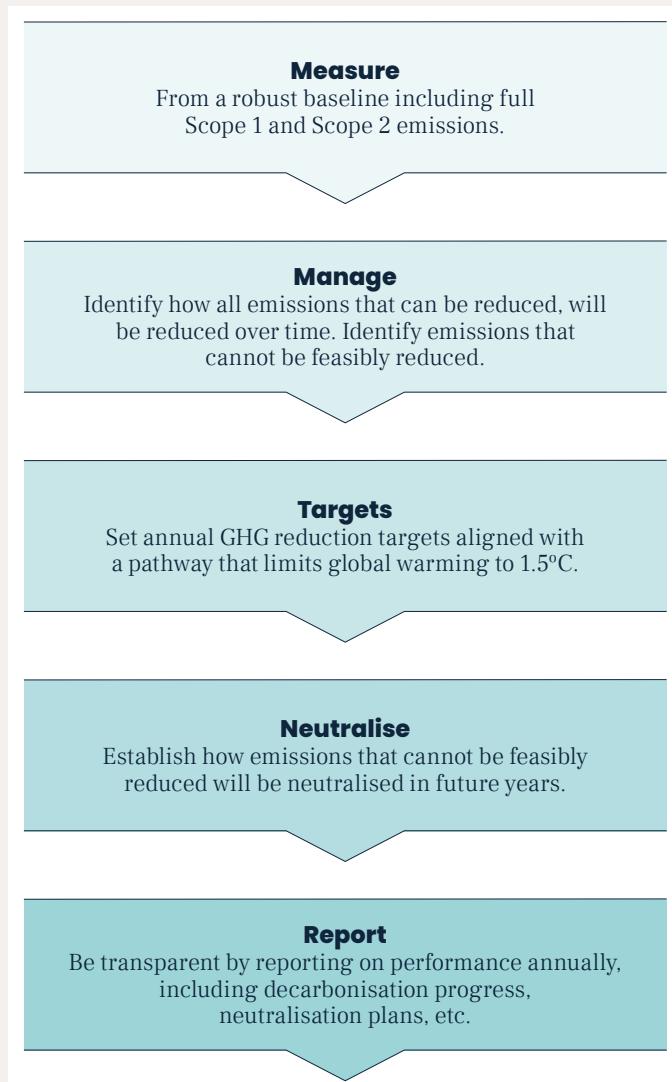
Climate change and net zero planning

In line with the ambitions set out in the Paris Agreement and commitments set out at the recent COP26 UN Climate Conference, Rank is considering its roadmap towards a carbon net zero future.

In tandem with our energy usage and power capacity review, we will be developing our carbon reduction strategies with our operational partners and will update stakeholders on our progress.

This will be formalised through a net zero framework and targets and criteria that involves achieving actual emissions reduction and neutralisation of any residual carbon from our operations.

The below roadmap sets out the journey ahead and our progress:



We are currently in the 'measure' phase of our pathway, and have undertaken sample assessments of our venues to review and audit current site energy consumption. However, given the broad variation in venue type, construction, energy systems and energy efficiency we will require further extensive reports per location category.

On completion of this study, the next stage will be to develop an energy management strategy that considers:

1. the use of low carbon technologies
2. the investment required for energy saving initiatives and payback period

This is likely to include a number of potential solutions such as LED roll out, building fabric and insulation, streamlined heating and cooling systems, solar power and infrastructure to support electric vehicles.

These will be assessed to ensure that they can effectively contribute to a clear and measurable target that is built on firm performance baselines and plots a steady reduction in our operational carbon emissions over the chosen time period.

This programme will be supported by a range of internal management and behavioural programmes to ensure that our colleagues have access to the right resources and possess the requisite skills to execute our ambitions in this area.

On completion of the assessment we will update stakeholders of our confirmed targets and strategy.

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

Commensurate with the requirement under Listing Rule (LR 9.8.6) regarding disclosures in relation to the TCFD recommendations, Rank will develop its reporting framework taking into account the TCFD recommendations. We will align our performance and strategy reporting to the four pillars of the TCFD: governance, strategy, risk management, and metrics and targets.

Governance



Board oversight

To enable oversight and governance of climate-related issues, it is important that such considerations are made, and discussions had, by Rank's leadership. As such, both the Board and the ESG & Safer Gambling Committee are informed of climate-related issues. The Audit Committee has also been made aware of the climate change accounting consideration in the preparation of this year's Annual Report and Accounts. While the Group recognises climate change as a relevant risk and/or opportunity for the business, that risk is presently considered low to the business over the short, medium and long term.

The ESG & Safer Gambling Committee has responsibility for the oversight of climate change policy, strategy and operational oversight, and identifying climate-related risks and contributing those to the Audit Committee for review. The Audit Committee holds responsibility for assessing the integrity of the ESG & Safer Gambling Committee's climate-related risk process and ensuring that it is in line with risk management process, as well as climate change disclosure. Further, the Executive Group Risk Committee plays a key role in the management of risks to the business. Further detail on committee activity can be found within the Governance Report of our 2022 Annual Report.

The Board is kept apprised of progress on all climate-related matters via the Chair of ESG & Safer Gambling Committee, and that Committee is informed by the Carbon Reduction Working Group.

The Group's assessment of climate-related risks and opportunities continues to develop, and the Board's consideration of such issues in FY 2022 reflects both this and the current understanding of climate change as being of low risk to Rank at present.

At the direction of the Board, the ESG & Safer Gambling and Audit Committees were both tasked with developing a better appreciation for climate-related risk and its potential impacts upon the business. The ESG & Safer Gambling Committee received a presentation from an ESG specialist and receive guidance from advisors on an ongoing basis.

The Board also considered climate-related issues when reviewing and shaping the ESG strategy, which was defined in 2021. This strategy was developed by the ESG & Safer Gambling Committee, informed by senior leadership across the business, and endorsed by the Board.

Material in annual budgeting is the regular investment into our real estate, and current considerations include insulation, lighting, and heating, ventilation and air conditioning (control). Climate-related issues will continue to be a consideration for the Board in reviewing and guiding performance objectives, monitoring and performance.

As the assessment of climate-related issues assessment matures and integrates more deeply into the strategic and risk assessment processes of the business, the business may integrate greater consideration of climate matters into other decision-making processes.

Management oversight

Climate change has the potential to impact the Group in a myriad of ways. Therefore, considerations from multiple segments of the business must feed into Rank's assessment of climate-related risks and opportunities. For the Group's finances, 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 capital market risks and requirements; for our Procurement Team, a key consideration is Scope 3 emissions management in order to meet net zero ambitions; and the management of our property portfolio through improving efficiencies and decarbonisation is material in reducing Scope 1 and 2 emissions.

Climate change is presently considered an emerging risk for the Group. To remain abreast of climate-related matters, management are informed by engaging with the Group's corporate advisors (ESG, broking, legal and accounting) through webinars, publications, 1-2-1 training sessions and ongoing discussions. In addition to advisor engagement, management monitors climate-related issues and their materiality on an ongoing basis. Risk Committee meetings (which also consider financial risks) are held monthly; the Risk and Audit functions work very closely together; and the risk registers are reviewed monthly by management and on a constant basis by each business unit.

Management informs the Board of climate-related risks and opportunities by submitting climate-related information via board and committee papers (this year, papers were issued to the Audit Committee detailing the TCFD recommendations and climate change accounting considerations), and in person at Board and Board Committee meetings by invitation.



Strategy



The Group defines the short, medium, and long-term time horizons as the following:

- Short – present to 2030
- Medium – 2030 to 2040
- Long – 2040

The financial impact of differing levels of risk are defined as follows:

- Low – managed as part of existing processes
- Medium – additional mitigation or investment required
- High – significant investment required and considered material risk to the business

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. During the year, Rank's accounting team conducted an assessment of climate-related matters that may impact the Group's financial statements. A summary of each is included below:

Intangible assets, property, plant and equipment, leased assets

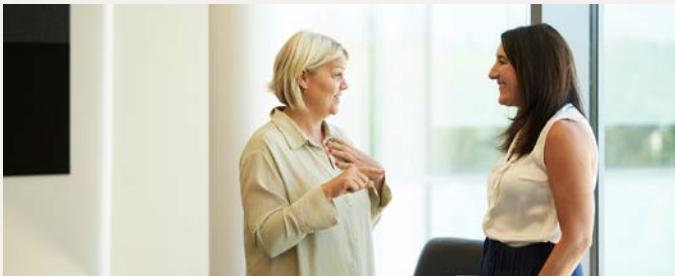
Climate-related risks may have a substantive financial or strategic impact of the Group's business, affecting the useful lives and residual values of intangible and tangible assets. It could be determined after assessment that useful lives may need to be reduced and depreciation and amortisation accelerated.

Impairment of assets

Impairment indicators should include significant changes in the technological, market, economic or legal environment that have an adverse effect on the Group. Increased awareness of the consequences of environmental change is triggering regulatory action, which is affecting stakeholders' perspectives.

Provisions

As the Group takes action to address the consequences of climate change, these actions may result in the recognition of new liabilities or, where the criteria for recognition are not met, new contingent liabilities may have to be disclosed.



Fair value measurement

The Group should be ensuring that relevant fair value measurements appropriately consider the relevant climate-related risk factors. Climate change can have a tangible effect on assets and liabilities now or 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 at year end, there is no legislation in place that will financially impact the Group. The Group will adjust the key assumptions used in value in use calculations and sensitivity to changes in assumptions should a change be required.

Climate-related risks and opportunities

The specific climate-related issues that could have a material financial impact on Rank have been identified for each time horizon and included in the **Risk Table** (please see pages 47-48). Climate-related physical risks, considered with reference to their potential impact on the financial performance of the Group as a whole, are being integrated into our business strategy through the mitigation activity flowing from the risk management processes monitored by the Group Risk Committee.

Some risks and opportunities are considered by geography. Flood risk, for example, is a greater risk in the UK, and we also consider law dependent on UK or EU jurisdiction. In terms of opportunity, the access to renewal energy is greater in Spain than in the UK.

Climate change does also present some opportunities. Organisations that shift their energy usage towards low emission energy sources could potentially save on annual energy costs. Furthermore, innovation and development of new low emission products and services may improve a business' competitive position and capitalise on shifting consumer and producer preferences.

At year end, climate-related risks are not anticipated to have a material financial impact on the business. Such issues do mean an adjustment in the Group's strategy to accommodate greater recognition of climate risk, and how this is assessed, resourced and communicated to stakeholders. The Board, Executive and working groups will continue to monitor all climate-related issues.



Risk

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

Risk description	Potential outcomes	Mitigating activities	Timeframe*
Policy and Legislation			
That Rank is not able to respond to increasingly stringent reporting obligations to the frequency or quality required.	Legal and/or reputational issues, which in turn drive compliance costs and potentially impact cost of capital. Financial impact: low	Monitor potential legislative and regulatory changes. Considering ability to achieve net zero by 2035 target. Working to define net zero strategy and set interim targets.	Short to medium
That nation states may introduce carbon emission levies, placing an additional fee upon energy consumption costs.	This may increase Rank's operating costs Financial impact: low to medium	Assess property portfolio to determine investment programmes that make building more energy efficient, less carbon intensive. Seek to source green energy.	Short
That new climate-related laws or regulations for which Rank is not prepared for.	Rank may be subject to an increase in accounting provisions, not initially budgeted for. This may impact profitability. Rank may be subject to increased compliance costs. Financial impact: low	Define decarbonisation strategy to remain ahead of regulation.	Short to medium
Technology			
Technology advances introducing more environmentally friendly equipment to replace existing IT infrastructure.	Whilst Rank does not rely on carbon intense assets for value generation it nevertheless uses IT equipment to fulfil a variety of functions: 1. Gaming machines on playing floors. Much of this equipment is sourced from the US. Whilst the US is committed to a 2050 net zero target, any variances in time commitments and energy efficiency requirements of electrically powered equipment, between the US market and the markets in which we operate in may lead to unexpected cost implications 2. Online gaming platform IT infrastructure and general business/operating IT infrastructure may suffer a reduction in useful life driven by major advances in IT energy efficiency, driving increase in depreciation and amortisation costs	Regular investment.	Short to medium

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

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

Risk description	Potential outcomes	Mitigating activities	Timeframe*
Market			
Climate induced changes to customer preferences for leisure.	Changes in consumer preferences may encourage more players to play online at home, rather than incur possible transportation emissions and continued utilisation of inefficient spaces. Financial impact: low	Formalise and communicate clear decarbonisation strategy.	Long
Supply chain cost inflation.	Increased costs related to the use of new environmentally friendly materials or processes could result in contracts previously expecting to be profitable becoming loss making. Financial impact: low	Commencing Scope 3 assessment to better understand Rank's exposure to high emitting sections of its value chain. In time, will seek increased information regarding climate risk exposure from key suppliers.	Medium
Reputational			
Failure to meet internal or external stakeholder climate-related expectations, impacting relations.	Perceived higher risk investment, increasing cost of capital with investors, financial institutions and insurers. Reduced revenues due to challenges in attracting new talent and increased opex from employee turnover. Financial impact: low to medium	Define and communicate our net zero ambitions.	Short

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

Risk description	Potential outcomes	Mitigating activities	Timeframe*
Extreme weather events like drought, flooding and storms			
Damage to our properties and vehicles which will incur increased capex and insurance costs.	Impacts of supply chain disruption from increased severity of extreme weather events may impact opex and capex, as well as impact revenue if customer demands for online entertainment cannot be met. Financial impact: low to medium	Business continuity and crisis management plans in place	Short to long
Changes in average climate conditions including rising sea levels, coastal flooding and increased average temperatures			
Increased operating costs driven by the as the increased use of climate control systems across our properties.	Increased maintenance and insurance costs. Financial impact: low to medium	Investment into property portfolio	Short to long

Scenario analysis

To evaluate the resiliency of the Group's strategies to climate-related risks and opportunities, we have conducted an analysis for two different possible scenarios: the rise in global temperature is limited to less than 2 degrees, or the global temperature rises by more than 2 degrees. The risks and opportunities to the Group under each scenario are presented 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 working with our landlords, and reduce 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.

Short term (to 2030)	Medium term (2030 to 2040)	Long term (beyond 2040)
Risks	Risks	Risks
Higher transition risks associated with moving to a low-carbon economy	Continued transition risks	Less significant increase in physical risks
<ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - 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		
<ul style="list-style-type: none"> - 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 and outweigh transitional risks.

Short term (to 2030)	Medium term (2030 to 2040)	Long term (beyond 2040)
Risks	Risks	Risks
Slight increase in transition and physical risks in the short term	Increasing physical risks due to a failure to adequately transition to a low-carbon economy	Increased physical risks due to a failure to adequately transition to a low-carbon economy
<ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - Increase in energy costs. - Flooding at certain high-risk venues due to increased sea level.
Opportunities		
<ul style="list-style-type: none"> - 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. 		

Risk management

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

As the Group's appreciation for the complexities of climate risk has developed, (that the risks may manifest in a variety of transitional and physical risks) so it has evolved its representation of climate risk within its Risk Register. As such, climate risk is included as an emerging risk on the Company's Risk Register. The potential size and scope of identified climate-related risks is determined in the same manner as any risk on the Risk Register.

The Group's risk management process involves an analysis which weights 'Impact' against 'Likelihood'. The financial impact of risk is defined thus: Low – managed as part of existing processes; Medium – additional mitigation or investment required; and High – significant investment required and considered material risk to the business.

Decisions to mitigate, transfer, accept, or control climate-related risks are made in the same manner as any risk on the Risk Register, as climate risk is included as a standalone risk on our Risk Register and is therefore integrated into the overall risk management framework. Defining climate as an emerging risk also means that the Audit Committee has general oversight of this issue. Additionally, through guidance from the ESG & Safer Gambling committee, the Audit Committee is encouraged to consider climate-related matters when considering the following Principal Risks:

1. Taxation (should a carbon price be introduced)
2. Business continuity planning and disaster recovery (should any physical climate-related risks impact the business or its supply chain – flash flooding etc.)
3. People (desire to work for an employer that is committed to net zero etc.)

Over the coming months the Group will start to consider the spread of physical and transitional risks on our register. As previously acknowledged, climate-related risks are varied and permeate many other existing risks overseen by the Board.

During the year, we conducted desktop assessment to review the perceived flood risks of our UK properties, which comprises 92% of our portfolio. Using UK government and Scottish Environmental Protection Agency online tools, we identified the following:

	Surface risk	River risk	Coastal risk
High	12.20%	0.80%	1.60%
Medium	17.10%	3.25%	
Reservoir		5.70%	

Metrics and targets

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 are published as part of the Group's obligations to report in line with Streamlined Energy & Carbon Reporting ('SECR').

SECR report

Objectives of this report

This report has been prepared to support Rank's compliance with the Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013 and the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2019.

These pieces of legislation require quoted companies to report energy consumption and greenhouse gas emissions arising from activities for which those companies are responsible. The report also provides Rank with an annual review of the Group's energy consumption.

Scope boundaries

An operational control approach has been used to define the Greenhouse Gas ('GHG') emissions boundary.

For Rank's mandatory scope, this captures emissions associated with the operation of Rank's sites and company-owned transport. The 'full scope' also includes the voluntary disclosure of emissions resulting from electricity transmission and distribution losses, Private vehicles (used for Company business), air travel and waste disposal. All emissions, mandatory and voluntary, refer to UK and Spain operations only.

This information was collected and reported in line with the methodology set out in the UK Government's Environmental Reporting Guidelines, 2019.

Emissions have been calculated using the 2021 conversion factors provided by Defra. There are no material omissions from the mandatory scope 1 and 2 emissions. The reporting period is July 2021 to June 2022, as per Rank's financial accounts.

Supporting material

An emissions data file has been compiled according to a specification agreed with Rank. The data file will be retained by Consultus International Group ('Consultus') and is available for audit upon request. The supporting data, as supplied by Rank and relevant third parties is held by Consultus and can be made available on request.

Quantification and reporting methodology

The Group has taken guidance from the UK Government Environmental Reporting Guidelines (March 2019), the GHG Reporting Protocol – Corporate Standard, and from the UK Government GHG Conversion Factors for Company Reporting document for calculating carbon emissions. Energy usage information (gas and electricity) has been obtained directly from our energy suppliers and half-hourly ('HH') data, where applicable, for the HH supplies.

For supplies where there was not complete 12-month energy usage data available, flat profile estimation techniques were used to complete the annual consumption. Transport mileage and/or fuel usage data was provided for their company and employee-owned vehicles. tCO₂e emissions were calculated using the appropriate emission factors from the UK Government GHG conversion information and retained within the organisations Data File for reference where required with the exception of Spain which is from the IEA.

Overall Group Position

Emission source Energy Type	2021/22 kWh	2020/21 kWh	% of 2021/22 total	Change +/-
Gas	63,554,204	54,304,890	52%	17%
Electricity	61,279,863	47,548,865	46%	29%
Company Travel	3,993,358	2,529,333	2%	58%
Total	128,827,425	104,383,088	100%	23%

UK Group Position

Emission source Energy Type	2021/22 kWh	2020/21 kWh	% of 2021/22 total	Change +/-
Gas	63,110,578	53,356,974	54%	18%
Electricity	57,120,020	43,524,462	44%	31%
Company Travel	3,993,358	2,529,333	3%	58%
Total	124,223,956	99,410,769	100%	25%

* Company travel 2021/22 includes all Scope 1 and Scope 3 data.

Spain Group Position

Emission source Energy Type	2021/22 kWh	2020/21 kWh	% of 2021/22 total	Change +/-
Gas	443,626	293,036	9%	51%
Electricity	4,159,843	2,845,759	91%	46%
Total	4,603,479	3,138,795	100%	47%

* Belgium's emissions data included in overall group position for 2020/21.

GHG Emissions Summary

Energy Type	2021/22 tCO ₂ e	%	2020/21 tCO ₂ e	%
Gas (Scope 1)	11,641	43.4%	9,946	41.3%
Company Transport (Scope 1)	551	2.1%	662	2.6%
Employee Transport (Scope 3)	206	0.8%	–	0.0%
F-Gases (Scope 1)	145	0.5%	50	0.2%
Electricity (Scope 2)	12,897	48.1%	11,066	46.0%
Transmission & Losses (Scope 3)	1,089	4.1%	–	0.0%
Air Travel (Scope 3)	198	0.7%	15	0.1%
Waste (Scope 3)	112	0.4%	2,368	9.8%
Total	26,840	100%	24,067	100%

Energy Type	2021/22	2020/21
Scope 1 (Mandatory)	12,337	10,618
Scope 2 (Mandatory)	12,897	11,066
Mandatory total	25,235	21,684
Scope 3 (Compulsory)	1,605	2,383
Total	26,840	24,067

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

Whilst we embrace the recommendations, we recognise that our disclosures are not yet fully consistent with some of the TCFD recommendations and in such cases we have explained why and provided a description of the priority actions to be taken to close the gaps. All information considered material to our TCFD disclosures are presented within this TCFD section.

TCFD Pillar	2021/2022	2020/2021
Governance	a. Describe the Board's oversight of climate-related risks and opportunities	Status: green Intention: the Board and relevant committees to strengthen the consideration of climate-related issues when reviewing and guiding business plans, major capital expenditure and M&A activity.
	b. Describe management's role in assessing and managing climate-related risks and opportunities.	Status: green Intention: the Group is to clarify the mandate of the Carbon Reduction Working Group and to keep improving mechanisms for informing managers of climate-related matters.
Strategy	a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term.	Status: green Intention: continue to mature scenario analysis and resilience testing of risks over the short, medium and long term.
	b. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	Status: amber Intention: seek to prioritise the factoring of climate-related risks and opportunities into investment strategies and financial planning.
	c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Status: amber Intention: continue to mature scenario analysis and resilience testing of risks over the short, medium and long term.
Risk Management	a. Describe the organisation's processes for identifying and assessing climate-related risks.	Status: amber Intention: build greater capacity within the Group to identify and assess climate-related risks.
	b. Describe the organisation's processes for managing climate-related risks.	Status: amber Intention: whilst each of the transitional and physical risks listed in the report are deemed low to medium financial risk to the business in the short term, further research is required to determine the financial materiality of these risks over the medium and longer term.
	c. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	Status: amber Intention: further resource and consideration to be given to the management of climate-related risks.
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.	Status: amber Intention: whilst the Group already reports scope 1 and 2 emissions, certain scope 3 emissions are captured the business may consider the adoption of an internal carbon price to measure impact and the potential payback on business plans and relevant capital investment programmes.
	b. Disclose Scope 1, Scope 2 and, if appropriate Scope 3 greenhouse gas ('GHG') emissions and the related risks.	Status: green Intention: whilst the Group already reports scope 1 and 2 emissions, certain scope 3 emissions are captured and it is the intention of the business in the coming years to set a firm net zero target, in line with the requirement of the Science Based Targets Initiative.
	c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	Status: red Intention: to announce decarbonisation targets during the next financial year.

Community

We have always occupied a central role in the communities in which we operate, and our Mecca venues in particular are a social hub for local people. Playing bingo is a key form of social interaction for many isolated and older people and our clubs will continue to provide this leisure service for generations to come. The strong ties we have with local communities influence our approach in this area; our colleagues go beyond the expected to support their customers, we champion charitable initiatives on a venue-by-venue basis and advertise employment opportunities locally, and we chose our Group-wide charity partner, Carers Trust, on the basis of its network of carers centres across the UK that support people doing vital unpaid work.



Developing our community strategy

As a result of the pandemic, the understanding of the integral role we play in communities came into sharper focus. We made it a priority to keep supporting our customers even when our venues were forced to shut during lockdowns. Our outreach initiatives included conducting weekly check-in calls with customers for whom we felt it would be helpful, setting up community bingo events on Zoom, and making birthday calls to customers.

As the pandemic restrictions eased, we were still keen to maintain this community focus. In the short term we continued our customer check-in calls for those still not comfortable with re-entering our venues, donated provisions for those hosting Veterans' Day street parties, and invited community groups to utilise our venues to host meetings and events.

In the longer term, we want to maintain this momentum and we recognise that our customers and communities will continue to need support. While much of our activity has been driven locally and we will continue to operate initiatives on a venue-by-venue basis, we are working towards formalising a central strategy on community engagement and support. Our new Mecca Managing Director will play a significant role in developing this strategy.

“Our venues sit right at the very core of our communities. More than just entertainment venues that serve our neighbourhoods, we are the glue that keeps people connected and a community hub where everyone has a seat at the table. Our venues are a home away from home, where customers can socialise, have a laugh, relax, and interact with our caring teams, as well as their friends and family, in a warm, safe and friendly club. For many we are the only human contact they might get that day and so most importantly we are pleased to provide a place where they can just simply feel like they belong.”

Andy Crump
Mecca Managing Director

Our Group-wide charity partnership: Carers Trust

Since 2014 Rank has been partnered with Carers Trust, a charity which works to improve services, support and recognition for unpaid carers. During our partnership so far, the Group has raised £3,193,763.79 for the charity and supported 13,135 carers. In order to take ownership of a specific project to support the Carers Trust, we established Rank Cares Grants. Enabled by the fundraising efforts of our colleagues across the Group, we give grants to carers in three areas:

- **Carers Essentials Fund** – carers can apply for grants towards the cost of vital equipment such as washing machines, cookers, fridge freezers or beds.
- **Carers Take Time Out Fund** – giving carers time out from caring to relax, do something for themselves and recharge their batteries.
- **Carers Skills Fund** – enabling carers to learn new skills to help them with caring or to return to work.

For a carer to receive a grant, they must submit an application with one of our 120 network partners around the UK. These applications are then reviewed by a Grants Panel. We invite colleagues from around the business to sit on these panels so that they can appreciate the impact of our fundraising and the importance of supporting carers.

Charitable and community engagement

Support carers through our Group-wide charity partnership with Carers Trust

Amount fundraised for Carers Trust

2022	£284k
2021	£267k

Number of carers supported

2022	525
2021	566

Total number of carers supported since 2014

13,135

**CARERS
TRUST**

Support isolated vulnerable individuals

**Number of hampers donated
(hampers worth £206,500)**

4,130

Supporting local campaigns

Being part of their local community as they are, our colleagues working in the clubs feel a strong connection to local people. As such, in addition to fundraising for our Group-wide partnership with Carers Trust, our clubs around the country support local initiatives and causes as well.

At Christmas in 2020 and 2021, we mobilised all of our Mecca clubs to create and pack 4,100 hampers for vulnerable and isolated people as part of the 'Everyone Deserves a Christmas' campaign. Each club selects a local charity or organisation to donate the hampers through, as they are best placed to understand the needs of the local community and send the donations where they are most needed.

Socio-economic contribution

Betting and gaming is an important sector of the leisure market in terms of employment and its broader economic contribution, both in the UK and across the world. Our venues business, in particular, is labour-intensive and the jobs that we create and sustain are something in which we take considerable pride.

Part of our commitment to the communities in which we operate is in providing employment opportunities to local residents. In order to localise our recruitment activity, when promoting a job vacancy we will always advertise at the local job centres and colleges. We also promote jobs through online platforms where we will send 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.

Additionally, ours is an industry which generates high levels of tax revenue to the governments in those countries in which we operate.

"What has blown me away since I joined the business is the incredibly strong relationship between our team and customers. We have some leisure players who come and go, but many customers are integral members of the Rank community. We are a place where people go with friends and family and spend a lot of time either gaming or eating or drinking or watching sports, and that really surprised me. So our team will genuinely know your cat's name, your dog's name, your goldfish's name, and we are just like their extended family. Sometimes, I just sit, watch and listen and it's amazing how before a customer has even approached the bartender, the drink is on the bar. They know what they want."

Debbie Husband

Grosvenor Venues Managing Director



Case study

Callum's Rank funding paid for a life-saving counselling course



Callum, 19, has taken a big role in caring for his sister Sally, ever since he was five years old. Sally is now 17 years old and when Callum is not at university studying to be a doctor, he spends at least 30 hours a week helping his mum, Sarah, to look after his sister whilst trying to help her increase her independence.

Sally's inherited condition, spinal muscular atrophy (SMA) type 2, is a degenerative condition which is hopefully being maintained with novel medication. She has been in a wheelchair since she was very young and she cannot move much by herself and struggles to sit upright, requiring physical support and help repositioning. She can move her arms but, as one might expect, is quite weak and requires a lot of help.

Callum takes his caring role, as well as his studies, seriously but the crunch came during the pandemic when Sally had to be at home, shielding, for long periods of time.

He said: "The lockdown became very difficult when we were told to shield because Sally's weakened respiratory system made her potentially very vulnerable. On top of this, it was also Year 12 for me meaning I had serious exams to contend with in the following year. The three of us (Mum, Sally and I) coped only because we were together supporting each other but I had several panic attacks and very serious anxiety."

Money from a Rank-funded grant was awarded, and Callum spent it to partly fund a course of cognitive behavioural therapy following a diagnosis of anxiety and depression.

He said: "The panic attacks have not returned since starting university and my anxiety is much reduced, so I am extremely pleased to have had the opportunity to do this private course."

Andrea James, a Young Adult Carer Officer at Carer Support Wiltshire said: "During the pandemic the stress and added responsibility was huge. There is only his mum, his sister and Callum at home. This young adult carer has taken on the role of father figure and takes his responsibility very seriously. His sister's condition has had a huge impact and has shaped what he will do with the rest of his life."

We have also supported a range of additional initiatives to give support to carers across the country. For Carers Week 2022, we wanted to offer carers the chance to have a break and do something for themselves. We invited carers to our Mecca Bingo clubs for a game or to our Grosvenor venues for afternoon tea.

"Thank you so much to Grosvenor Casino at Bolton for our lovely Carers afternoon tea. It was a lovely relaxing couple of hours and we were made to feel extremely welcome. Very enjoyable."

Lynda
Carer

Spotlight

Fundraising for Rank Cares Grants



Thanks to the enthusiasm and dedication of our colleagues, in the 2021/22 financial year we raised £284,484.51 to support our grants programme.

The funds raised have stemmed from a range of events, including £10k by colleagues undertaking the Big Half and London Marathon, over £3k for sponsored skydives, over £14k on a Bingo night, and almost £5k from our reinstated annual City poker event (suspended previously due to COVID-19).

To celebrate Mecca's 60th anniversary, we challenged the clubs to raise £60k in 60 days and, packing in numerous fundraising activities across the two months, the team was able to surpass this target and reached a total of £61,038!

We also introduced the 'Doughnut Donation', wherein 20p from each doughnut dessert purchased from our Mecca clubs is donated to the grants fund, and we donate 100% of the profits when our online customers play in certain bingo rooms at allotted times every week.

Case study

MPs and Mecca Bingo



A number of local MPs have recognised the central role our Mecca venues have in their communities. In Wrexham, in North Wales, Sarah Atherton MP has supported our efforts packing hampers for the 'Everyone Deserves a Christmas' campaign two years running now, as well as supporting our National Bingo Day celebrations in aid of Variety, the Children's Charity.

Even after the lockdowns, we have continued to make our venues available to the community to host events, and Sarah held a constituency surgery at Mecca Bingo Wrexham in Spring 2022.

"Projects such as Mecca's 'Everyone Deserves a Christmas' is a shining example of this community spirit in action here in Wrexham. I am proud of our community for rallying around those who may be struggling this year as a result of this pandemic and to ensure that everyone enjoys the festive season."

Money raised to support our grants programme

£284,484

Sarah Atherton MP
MP Wrexham

SASB data

To enable our stakeholders to access those ESG metrics which are financially material to the business, we have included industry-specific metrics as recommended by the Sustainability Accounting Standards Board ('SASB'). We have reported against those metrics set out in the SASB Casinos & Gaming Standard, as well as selected metrics from the Software & IT Services and Multiline and Specialty Retailers & Distributors standards.

Casinos & Gaming

Energy Management

SASB code: SV-CA-130a.1

Total energy consumed (kWh)

2022	 128,527,425
2021	 104,383,088

SASB code: SV-CA-130a.1

Percentage grid electricity

2022	 100%
2021	 100%

SASB code: SV-CA-130a.1

Percentage renewable

2022 0%

2021 0%

Responsible Gaming

SASB code: SV-CA-260a.1

Percentage of gaming facilities that implement the Responsible Gambling Index

2022 Not applicable for Rank's operations

2021 Not applicable for Rank's operations

SASB code: SV-CA-260a.2

Percentage of online gaming operations that implement the National Council on Problem Gambling ('NCPG') Internet Responsible Gambling Standards

2022 Not applicable for Rank's operations

2021 Not applicable for Rank's operations

Casinos & Gaming

Smoke-free casinos

SASB code: SV-CA-320a.1

Percentage of gaming floor where smoking is allowed

2022 0% (excludes outdoor smoking areas)

2021 0% (excludes outdoor smoking areas)

SASB code: SV-CA-320a.1

Percentage of gaming staff who work in areas where smoking is allowed

2022 0% (excludes outdoor smoking areas)

2021 0% (excludes outdoor smoking areas)

Internal Controls on Money Laundering

SASB code: SV-CA-510a.1

Description of anti-money laundering policies and practices (see page 18)

SASB code: SV-CA-510a.2

Total amount of monetary losses as a result of legal proceedings associated with money laundering (based on legal cases) (£)

2022 0

2021 0

Casinos & Gaming

SASB code: SV-CA-000.A

Number of casino gaming tables

2022	613
2021	610

SASB code: SV-CA-000.B

Number of casino slots – Grosvenor B3/B4 Machines

2022	1,385
2021	1,385

SASB code: SV-CA-000.C

Number of active online gaming customers

2022	793k
2021	821k

SASB code: SV-CA-000.D

Total area of casino gaming floor (m²)

2022 Data not available

2021 Data not available

Software & IT Services

Environmental

SASB code: TC-SI-130a.1

Total energy consumed (kWh)

2022	128,527,425
2021	104,383,088

SASB code: TC-SI-130a.1

Percentage grid electricity

2022	100%
2021	100%

SASB code: TC-SI-130a.1

Percentage renewable

2022 0%

2021 0%

SASB code: TC-SI-130a.2

Total water withdrawn (m³)

2022	214,625
2021	209,259

SASB code: TC-SI-130a.2

Total water consumed (m³)

2022 Not recorded

2021 Not recorded

SASB code: TC-SI-130a.2

Percentage of each in regions with high or extremely high baseline water stress (%)

2022 Not recorded

2021 Not recorded

Software & IT Services

Data Privacy & Freedom of Expression

SASB code: TC-SI-220a.1

Description of policies and practices relating to behavioural advertising and user privacy (see page 28)

SASB code: TC-SI-220a.2

Number of users whose information is used for secondary purposes

2022	545
2021	430

SASB code: TC-SI-220a.3

Total amount of monetary losses as a result of legal proceedings associated with user privacy (£m)

2022 Zero

2021 Zero

SASB code: TC-SI-220a.4

Number of law enforcement requests for user information

2022	101
2021	62

SASB code: TC-SI-220a.4

Number of users whose information was requested

2022	111
2021	84

SASB code: TC-SI-220a.4

Percentage resulting in disclosure

2022	75%
2021	80%

Software & IT Services

Data Privacy & Freedom of Expression

SASB code: TC-SI-220a.5

List of countries where core products or services are subject to government-required monitoring, blocking, content filtering or censoring

2022 Not applicable for Rank's operations

2021 Not applicable for Rank's operations

Maintain IT security and continuity of platforms

Statutory report of personal data breach to the regulator

2022 Zero

2021 1

Data Security

SASB code: TC-SI-230a.1

Number of data breaches

2022	14
2021	11

SASB code: TC-SI-230a.1

Percentage involving personally identifiable information

2022	43%
2021	64%

SASB code: TC-SI-230a.1

Number of users affected

2022	660
2021	1,060

SASB code: TC-SI-230a.2

Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards (see page 28)

Software & IT Services

Recruiting & Managing a Global, Diverse & Skilled Workforce

SASB code: TC-SI-330a.1

Percentage of UK employees that are foreign nationals

2022 Not recorded

2021 Not recorded

SASB code: TC-SI-330a.1

Percentage of UK employees that are located offshore

2022 0%

2021 0%

SASB code: TC-SI-330a.3

Percentage of gender and racial/ethnic group representation for management

2022 25%

2021 22%

SASB code: TC-SI-330a.3

Percentage of gender and racial/ethnic group representation for technical staff

2022 Not applicable for Rank's operations

2021 Not applicable for Rank's operations

SASB code: TC-SI-330a.3

Percentage of gender and racial/ethnic group representation for all other UK employees

2022 32%

2021 31%

SASB code: TC-SI-330a.2

Employee engagement

2022 68%

2021 65%

Software & IT Services

Intellectual Property Protection & Competitive Behaviour

SASB code: TC-SI-520a.1

Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations (£)

2022 Zero

2021 Zero

Managing Seismic Risks from Technology

SASB code: TC-SI-550a.1

Number of performance issues/service disruptions – excludes operations outside of the UK and Gibraltar (Days)

2022 152

2021 209

SASB code: TC-SI-550a.1

Number of total customer downtime (Days)

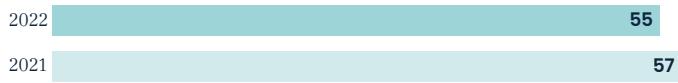
2022 Not recorded

2021 Not recorded

Software & IT Services

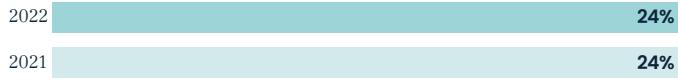
SASB code: TC-SI-000.A

Number of licences or subscriptions – excludes locally managed subscriptions and those used in our Spanish operations



SASB code: TC-SI-000.A

Percentage cloud-based – excludes locally managed subscriptions and those used in our Spanish operations



SASB code: TC-SI-000.B

Data processing capacity

2022 Not available

2021 Not available

Software & IT Services

SASB code: TC-SI-000.B

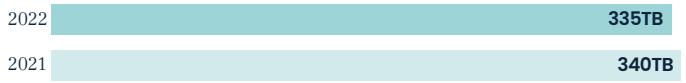
Percentage outsourced

2022 Not available

2021 Not available

SASB code: TC-SI-000.C

Amount of data storage – excludes Azure data storage, locally managed storage and storage for our Spanish operations



SASB code: TC-SI-000.C

Percentage outsourced – excludes locally managed data and those used in our Spanish operations



Multiline and Speciality Retailers & Distributors

Labour Practices

SASB code: CG-MR-310a.1

Average hourly wage

	2022	2021
Mecca venues	£9.76	£9.01
Grosvenor venues	£10.92	£9.97
Enracha venues	€12.40	€10.20

SASB code: CG-MR-310a.1

Percentage of in-store employees earning minimum wage, by region

	2022	2021
Mecca venues	70%	78%
Grosvenor venues	28%	60%
Enracha venues	not available	not available

SASB code: CG-MR-310a.2

Voluntary turnover rate for in-store (venues) employees

	2022	2021
Mecca venues	40%	19%
Grosvenor venues	52%	21%
Enracha venues	4%	4%

Multiline and Speciality Retailers & Distributors

Labour Practices

SASB code: CG-MR-310a.2

Involuntary turnover rate for in-store (venues) employees

	2022	2021
Mecca venues	9%	11%
Grosvenor venues	11%	5%
Enracha venues	13%	1%

SASB code: CG-MR-310a.3

Total amount of monetary losses as a result of legal proceedings associated with labour law violations (£)

	2022	2021
Only regarding court proceedings	Zero	Zero

GRI reference table

GRI content index

Statement of use

Rank Group has reported the information cited in this GRI content index for the period 1 July 2021 to 30 June 2022 with reference to the GRI Standards. We have also indicated where relevant information can be found within the Annual Report or on our website.

GRI 1 used – GRI 1: Foundation 2021.

GRI Standard	Disclosure	Location
GRI 2: General Disclosures 2021	2-1 Organisational details	Annual Report
	2-2 Entities included in the organisation's sustainability reporting	Annual Report
	2-3 Reporting period, frequency and contact point	Annual Report
	2-4 Restatements of information	Annual Report
	2-6 Activities, value chain and other business relationships	Annual Report
	2-7 Employees	Annual Report
	2-9 Governance structure and composition	Annual Report
	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	Annual Report
	2-14 Role of the highest governance body in sustainability reporting	Annual Report
	2-15 Conflicts of interest	Annual Report
	2-17 Collective knowledge of the highest governance body	Annual Report
	2-18 Evaluation of the performance of the highest governance body	Annual Report
	2-19 Remuneration policies	Annual Report
	2-20 Process to determine remuneration	Annual Report
	2-22 Statement on sustainable development strategy	Pages 4-5
	2-23 Policy commitments	https://www.rank.com/en/responsibility/policies.html
	2-26 Mechanisms for seeking advice and raising concerns	Annual Report
	2-27 Compliance with laws and regulations	Pages 18-19
	2-28 Membership associations	Pages 20-21
	2-29 Approach to stakeholder engagement	Annual Report
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Page 7
	3-2 List of material topics	Page 7
	3-3 Management of material topics	Throughout this 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 45-52
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Page 34
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

GRI Standard	Disclosure	Location
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	Page 51
GRI 303: Water and Effluents 2018	303-5 Water consumption	Page 43
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions 305-2 Energy indirect (Scope 2) GHG emissions 305-3 Other indirect (Scope 3) GHG emissions 305-4 GHG emissions intensity	Page 51 Page 51 Page 51 Page 9
GRI 306: Waste 2020	306-3 Waste generated 306-4 Waste diverted from disposal 306-5 Waste directed to disposal	Page 43 Page 43 Page 43
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Page 35
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	Page 32
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee 404-2 Programs for upgrading employee skills and transition assistance programmes	Page 35 Page 35
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees 405-2 Ratio of basic salary and remuneration of women to men	Page 39 Page 39
GRI 417: Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling	Page 31
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 60

The Rank Group Plc

TOR
Saint-Cloud Way
Maidenhead
SL6 8BN
Tel: 01628 504 000
www.rank.com

Company registration number: 03140769

Consultancy and copywriting by Buchanan Communications
buchanan.uk.com

Design and produced by Gather.london