

Betsson & Whistleblowing – Policy summary

This policy summary is based on Betsson's Whistleblowing Policy and aims to convey its most important principles.

Available Whistleblowing channels

Betsson Group is committed to conducting business with the highest standards of professionalism, integrity, and ethical behaviour, in line with our Code of Conduct and corporate values. Betsson takes every effort to avoid any malpractices that could result in serious consequences for the Group or its employees. However, all organisations face the risk of wrongdoings in any part of the business from time to time. A culture of openness and accountability is essential to prevent such situations from occurring and to address them when they do occur.

Therefore, Betsson AB (publ), being the ultimate parent entity of the Group, has since many years maintained a global whistleblowing channel accessible to all employees and other persons working for Betsson. To comply with EU's directive on the protection of persons who report breaches of Union law, Betsson nowadays also has several local and internal whistleblowing channels established for subsidiaries with at least 50 employees. These whistleblowing channels are governed by a global policy for Whistleblowing as well as operational procedures customized to local legal requirements to ensure the channels' independence and fair case investigations.

Whistleblowing – A piece of the puzzle

Whistleblowing is a key piece of the puzzle of Betsson's business ethics program. Other cornerstones include a yearly anti-corruption risk assessment, an anti-corruption policy, a Code of Conduct including reoccurring training on anti-corruption for employees. Other parts of a Betsson's endeavours to foster a transparent business climate include openness and trust expressed through our 'Open door policy' as well as both a *prohibition* on retaliation (unjustified detriment) by managerial personnel against persons who voice their concerns as well as *protection* from retaliation. Should an employee experience or suspect that our business in some way is conducted in conflict with applicable law, our Internal rules, or has led to other kinds of wrongdoings, Betsson's whistleblowing channels provide for a safe, reliable, and impartial way to raise one's voice.

Betsson's contribution to fair play within the online gaming industry

All Betsson's whistleblowing channels are managed by experienced lawyers and compliance managers according to a set procedure to ensure that submitted reports are handled in line with principles on confidentiality, anonymity, impartiality, presumption of innocence and with awareness of circumstances which may pose a conflict of interest. Information on what can be reported and how to use the whistleblowing channels are available on Betsson's intranet.

Betsson emphasises a sound 'tone at the top'. Therefore, the Board of Directors are presented with the outcome of the anti-corruption risk report and yearly re-adopts the global Whistleblowing policy. The Chairman and another director have view access to reports submitted into the global whistleblowing channel. Thereby, Betsson aspires to contribute to fair play within the online gaming industry.