

## **Betsson & AML/CFT – Policy and framework summary**

This summary is based on Betsson's AML and CFT policy (the "Policy") and framework and aims to convey its most important principles.

### **Primary objective – To keep crime out of gaming**

Betsson AB (publ), the stock listed parent entity of Betsson Group, is a holding company that invests in, and manages, fast-growing entities within online gaming. The Group's operational and licensing holding subsidiaries must, as obliged entities, comply with various local Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) legislation, however, Betsson AB is not considered an obliged entity according to AML/CFT legislation in Sweden as it does not hold any gaming licenses. Still, the operational subsidiaries' compliance with AML/CFT legislation is a key priority for Betsson AB, and for the Group as a whole. Betsson's primary objective is to actively prevent that the organisation becomes a vehicle for money laundering, terrorist financing, or any other illicit financial activities.

Therefore, the Board of Directors in Betsson AB has issued a policy statement to establish and maintain a minimum standard for AML/CFT endeavours across all markets where the Group operates safeguarding that Betsson's operational business observes a common minimum standard aligned with principles issued by key standard setters such as the international Financial Action Task Force. All with the aim to keep crime out of gaming.

### **Betsson's AML program**

To further strengthen the compliance with AML/CFT legislation, Betsson's Operational Management team and all concerned subsidiaries' Board of Directors have adopted the Policy that explains the Group's approach to AML and common sets of group wide controls on AML/CFT. Additionally, in the wide range of markets where the Group operates, Operational Procedures for AML/CFT are in place further outlining the specific local obligations subsidiaries must adhere to, to remain compliant in every jurisdiction.

The Policy and the Operational Procedures establish a) a risk-based approach, b) risk based procedures for initial and ongoing customer due diligence (Know Your Customer, or KYC) which comprise initial checks and ongoing screening to identify high risk customers such as Politically Exposed Persons, or persons subject to sanctions or other circumstances which may indicate connections with crime, c) risk based monitoring of customers' transactions and activities to identify suspicious transactions/behaviour including procedures to address such suspicions, and d) proper routines for record keeping and statutory reporting to relevant authorities such as Financial Intelligence Units. In addition, Betsson has appointed Money Laundering Reporting Officers for all such markets responsible for enforcing the policies and procedures across the Group, monitor compliance, and ensure timely reporting of suspicious transactions to relevant authorities. All Betsson's employees are regularly taking part in AML/CFT and KYC training customised to their roles and responsibilities within the business.

By applying a risk-based approach and continuously evaluate and develop Betsson's Business Risk Assessment within AML/CFT, the Group can understand which parts of its operations are posing the greatest risks so that adequate remediations can be put in place to reduce these risks. Lastly, to ensure the overall effectiveness of Betsson's AML/CFT program, regular internal audits and targeted assessments are conducted to identify any improvement areas.

### **Betsson's contribution to a safer online gaming industry**

Betsson is committed to maintaining the highest standards of ethical conduct and regulatory compliance within AML/CFT. The Group's AML policy aim to protect the organisation, customers, and other stakeholders from the risks associated with money laundering and illicit financial activities. By adhering to applicable legislation, continuously evaluating and address the main AML/CFT risks in the business activities, educate employees and collaborating with regulatory authorities, Betsson strives to contribute to a safer and more secure online gaming industry.

---