

# Anti-Corruption Policy

**For Betsson Group**

**GRC-010**

**Approved 2025-11-20 by the Board of Directors in Betsson AB**

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## Version log

### Revisions

Date	Version	Author	Description of changes
2021-09-16	1.0	Legal Counsel and Sr GRC manager	Initial version of new policy.
2022-10-04	1.1	Head of GRC and GRC Analyst	Minor linguistic revisions, with a new clause pertaining to External collaboration partners.
2023-10-04	1.2	Senior GRC Analyst	Minor linguistic revisions. Conflicts of Interest section moved under a dedicated heading.
2024-10-10	1.3	Senior GRC Manager (Compliance)	Annual review, no changes
2025-08-04	1.4	Senior GRC Manager (Compliance)	Annual review. Change in reference section 6.5

### Revisions approved by the Board of Directors

Version	Date of Policy	Date Approved
1.0	2021-09-16	2021-11-24
1.1	2022-10-04	2022-11-24
1.2	2023-10-04	2023-11-13
1.3	2024-10-10	2024-11-19
1.4	2025-08-04	2025-11-20

## 1. Introduction, objective, and scope

- 1.1. Within Betsson – we play fair. This means that Betsson has a zero-tolerance approach to corruption, bribery, and related corrupt practices. It is inherent in the Betsson DNA to honestly participate in, and fairly contribute to, the communities in which we have offices, employees, and operations.
- 1.2. This Anti-Corruption policy (the “Policy”) sets the objective and explains more in detail the core principles on how Betsson works with Anti-corruption. The Policy should be implemented in all parts of Betsson Group (covering Betsson AB and Betsson Operations, below referred to as Betsson or Betsson Group) taking applicable local legislation into account.
- 1.3. This Policy should be read in conjunction with the Code of Conduct and the Whistleblowing Policy available on Infosson and the Betsson AB website.
- 1.4. These standards do not only apply to Betsson, but to all suppliers, vendors, consultants and whoever Betsson is doing business with.

## 2. Corruption

### 2.1. Understanding corruption

- 2.1.1. There is no official and universal definition of the word *corruption* but one common meaning to it is *the abuse of entrusted power for personal gain* (which can also be someone else’s gain). This could mean participating in either criminal or unethical acts, such as giving or taking a bribe, either monetary or a gift or other benefits or by abusing a position of trust and thus abuse is to the benefit of one person while causing harm to another person, company, or community.
- 2.1.2. It is of utmost importance that Betsson manages the trust from our customers, shareholders, business partners and employees and as well as the societies in which we offer products, holds licenses, or have operations in. By working in the gambling sector, we are always at risk of corrupt practices as we handle player funds, accumulate vast amounts of player data and engage on a constant basis several consultants and suppliers. Adding to this, we are dependent on local licenses in jurisdictions world-wide, including contacts and interactions with authorities and public officials that is required to obtain or hold such licences.
- 2.1.3. Corruption is a crime which could result in fines and even imprisonment in most countries. In addition to complying with local laws and regulations, Betsson is committed to follow external conventions, guidelines and similar such as the OECD Convention of Combating Bribery and the UN Convention on Anti-Bribery, as well as local guidelines and applicable legislation such as the Institute against Bribery in Sweden and their statements of Anti-corruption, the UK Anti-Bribery Act including any associated guidelines. Betsson has also established its own set of rules and clarifications which can be found in Betsson’s Code of Conduct and thereto related policies and instructions.

## 2.2. Examples of corruption

- 2.2.1. The following is a non-exhaustive list of corrupt practices which are strictly prohibited within Betsson Group.
- a) the solicitation or acceptance, directly or indirectly, to or from any of our counterparties, of any article of monetary value, or other benefit, such as a gift, favour, promise, facilitating payment (i.e. payments to encourage or ensure that routine procedures are carried out or speeded up) or advantage for him or herself or for another person or entity, in exchange for any act, omission or decision;
  - b) the offering or granting, directly or indirectly, to a government official or a person who performs public functions, of any article of monetary value, or other benefit, such as a gift, favour, promise or advantage for him or herself or for another person or entity, in exchange for any act, omission or decision in the performance of his or her public functions;
  - c) any act, omission, or decision in the discharge of one's duties for the purpose of illicitly obtaining benefits for him or herself or for a third party; and
  - d) cronyism or nepotism (to appoint one's friends, family, or associates to positions of authority, without proper regard to qualifications, experience, and the internal onboarding/promotion process).

## 3. Guiding principles

### 3.1. Total prohibition of corrupt practices and bribery

- 3.1.1. It should be noted that what constitutes corruption and bribery has a cultural dimension to it, where some regions of the world certain behaviour or hospitality can be more acceptable than others. This fact can, however, never be an excuse to participate in corrupt practices or bribery. All Betsson employees, directors, vendors, suppliers, associated affiliates, consultants, and partners shall always act in an ethical manner, and more importantly, never take part in any corrupt practice.
- 3.1.2. Anti-corruption considerations must be incorporated in all aspects of our business. Anti-corruption measures shall be risk-based, meaning an evaluation of the specific risks related to a certain product, market, vendor, or person must be done as part of the day-to-day activities and in parallel to the operational business.

### 3.2. Low value threshold for gifts and business entertainment,

- 3.2.1. Acceptance or offering of gifts and business entertainment (e.g. food and drinks), or any other remuneration or benefits that may in any way unduly influence or be perceived to influence business judgement, decisions or behaviour are not allowed. This includes low value benefits but does not mean all benefits are prohibited. In the case of recurrent

benefits or if a benefit has a total market value exceeding EUR 50 (inc. local VAT), you must discuss the benefit with your line manager. Offering or accepting gifts of cash is prohibited. Further instructions may be found in the Code of Conduct

### **3.3. Sponsorships**

- 3.3.1. Sponsorships are part of our marketing, and it is important to show not only our brand but our commitment to local communities and teams. Various forms of sponsorship are therefore a vital part of our strategy and the Betsson vision, as well as our values of fair play. However, to maintain our reputation as a trustworthy global company within the iGaming industry, all sponsorships shall be made in good faith and on rational commercial grounds, with a clear cost/benefit analysis for maximal exposure of our brand(s).

### **3.4. Political donations**

- 3.4.1. Donating money to political parties or giving donations to politicians themselves is common in several countries all over the world. Nonetheless, it is also viewed with suspicion that such donations or money will influence the way a politician behaves in his or her office.
- 3.4.2. Betsson shall not be involved in political donations and will only work with public affairs either as part of our communicated strategy for public affairs and/or through various industry organisations which only operate through legal means.

### **3.5. Due Diligence of External collaboration partners**

- 3.5.1. All reasonable, appropriate measures, including screening of Betsson's business partners, service providers and other suppliers ("External collaboration partners"), shall be taken to secure that we do not involve ourselves in business with parties that are linked to organised crime and/or known, or suspected, to be involved in corrupt practices.
- 3.5.2. Betsson shall select External collaboration partners based on merit. External collaboration partners shall be evaluated against predetermined criteria to identify, assess, and mitigate corruption risks and to ensure that the External collaboration partner will behave in a manner consistent with this Policy. Payments to External collaboration partners must be appropriate, reasonable, and justifiable in return for legitimate products and/or services in line with the contract or agreement.
- 3.5.3. If an External collaboration partner experiences or comes across corrupt practices, this should immediately be raised with Betsson AB's Vice President for Governance, Risk and Compliance, in this Policy referred to as "Betsson's Designated Contact Person" at [GRC@betssongroup.com](mailto:GRC@betssongroup.com).

### **3.6. Reporting on corrupt practices and guidance**

- 3.6.1 All Betsson employees are expected to report any suspicion or knowledge of corrupt practices or attempts of such practices to their Reporting Manager. If the Reporting Manager is unavailable or if reporting to him or her is inappropriate due to the specific

circumstances, the corrupt practice should be reported to the next Manager in line or to local HR representatives.

- 3.6.2 Managers requiring advice, guidance, or assistance with interpretation on issues relating to gifts and entertainment are asked to consult local or group HR representatives. Queries relating to procurement shall be addressed to the legal and compliance team.
- 3.6.3 As further specified in the Whistleblowing Policy, Betsson provides an internal Whistleblower system which protects the identity of the reporting person and can be used in case of fear of retaliation or other negative repercussions, please see section 6. The Whistleblower system can be accessed on Infosson.
- 3.6.4 External parties noticing or experiencing corrupt behaviour from any Betsson employee or Betsson representative are asked to promptly notify Betsson's Designated Contact Person, so that Betsson can take relevant actions.

## **4. Conflicts of interest**

- 4.1. Conflicts of Interest can relate or lead to corrupt practices. There are no general prohibitions on doing business with former colleagues, friends, or family. However, such situations require special attention and care that the transaction or agreement is reached on fair market terms at arm's length distance and does not cause harm in any way to Betsson. Furthermore, it should not give Betsson unfair benefits or advantages on behalf of others.
- 4.2. To achieve this, all such transactions that involves former colleagues, friends, or family, or which could in any other way be questioned, should be subject to the four eyes principle where the Reporting Manager shall approve the transaction.
- 4.3. If an employee holds a position as Director, CEO or similar statutory appointment in a subsidiary or part-held entity, there may be local laws or regulations stating what is considered conflict of interest when exercising decision-making powers in the director's capacity. Each employee holding such position(s) is responsible to ensure compliance with local legislation in this regard.

## **5. Risk-based approach**

- 5.1. Betsson follows a risk-based approach in organising the day-to-day work of integrating control mechanisms and processes relating to Anti-corruption. The guiding principle is that resources shall be directed in accordance with priorities, so that the greatest risks receive the highest attention.
- 5.2. For Betsson, risks related to corruption and bribery may emanate from our customers, employees, vendors, suppliers, and consultants, among others. Based on this, Betsson has developed and maintains an Anti-Corruption Risk Assessment that is an integral part of the Group Anti-corruption Framework.

- 5.3. This assessment covers specific “high-risk” areas or processes as identified in the “Reporting guidance on the 10th principle against corruption” issued by the United Nations, and Transparency International for potential threats and vulnerabilities related to fraud, bribery, and corruption across the activities of the Group, which include:
- a) **Country-specific Risks:** This is evidenced by perceived high levels of corruption, an absence of effectively implemented anti-bribery legislation and a failure of the foreign government, media, local business community and civil society to effectively promote transparent procurement and investment policies.
  - b) **Business Area Risks:** Inherent risks related to for example Finance, Human Resources, M&A project teams or similar.
  - c) **Transactional Risks:** Certain types of transaction give rise to higher risks, for example, charitable or political contributions, licences and permits, and transactions relating to public procurement.
  - d) **Business Opportunity Risks:** Such risks might arise in high value projects or with projects involving many contractors or intermediaries; or with projects which are not apparently undertaken at market prices, or which do not have a clear legitimate objective.
  - e) **Partnership Risks:** Certain relationships may involve higher risk, for example, the use of intermediaries in transactions with foreign public officials; consortia or joint venture partners; and relationships with politically exposed persons where the proposed business relationship involves, or is linked to, a prominent public official.
  - f) **Internal Risks:** This relates to employee training, bonus culture, documented procedures etc.

- 5.4. The assessment is coordinated by the GRC function with input from key individuals within the organisation, as identified below, who have a key role as part of the Anti-corruption framework and are responsible to ensure that the standards set out in this Policy are met.

## 6. Roles and responsibilities

- 6.1. Anti-corruption awareness and actions is everyone’s responsibility, but the overall and ultimate accountability lies within the Board of Directors of Betsson AB, the CEO of Betsson AB, and indirectly the GRC function as certain responsibilities are delegated to this function.
- 6.2. The CEO of Betsson AB oversees the Anti-corruption work and, with the help of his or her management team, ensures the overall implementation and compliance with the relevant laws and regulations including applicable recommendations and guidelines (the “Applicable law”) and internal policies and other steering documents relating to this field (the “Framework”).

- 6.3. The Operational CEO is responsible for ensuring compliance with the Policy and the related Framework within all the subsidiaries, including the approval of the Framework (from time to time and at recurring intervals) in the Group's subsidiaries. It is also the joint responsibility of both CEOs to ensure this Policy is duly communicated within Betsson Group so that all employees are familiar with its content and can follow its practice (which can be done by training sessions, or as they deem fit).
- 6.4. Each Manager also has a responsibility towards the operational CEO to ensure compliance with the Framework within the realm of their respective field and area of responsibility, to act as an ambassador for the Betsson values including the Betsson stance on Anti-corruption, to facilitate and to ensure proper training is available to all and to allow employees to participate in and/or follow training, and to act in an exemplary manner in cases where corruption or bribery is discovered.
- 6.5. It is the responsibility for everyone to always be familiar with and comply with this Policy and the related Framework. This responsibility includes also to report suspicious activities or attempts of corruption or bribery (within Betsson or externally) by using the Whistleblower system (for internal use) or contact Betsson's Designated Contact Person (for external parties) as described in section 3.650.
- 6.6. It should, as a final remark (also explained above in the Guiding principles), be pointed out that the Anti-corruption work is an ongoing and risk-based assessment which should be part of our everyday work.

## **7. Whistleblowing**

- 7.1. Each employee is expected to be vigilant and report suspicions of attempts or committed acts of bribery and corruption. Employees may also suspect or come to know of actual breaches of this Policy.
- 7.2. Submission of a report on breaches to any Anti-corruption law or corrupted practices should primarily be made through Betsson's Whistleblower system and, for external parties, by contacting Betsson's Designated Contact Person.
- 7.3. Reporting made in good faith will be handled with absolute discretion to safeguard the identity of the reporting person to ensure protection from any threats or retaliation. More information is available in the Whistleblowing policy (GRC-013) and the Operational Procedures for whistleblowing.

## **8. Training**

- 8.1. All employees shall on an annual basis undertake a mandatory Anti-corruption and bribery training program aimed at providing education on applicable measures and best practices on Anti-corruption. It is each managers' responsibility to ensure that all employees are familiar with the Policy, its content, and that the Policy is adhered to.

## **9. Consequences of non-compliance**

- 9.1. A violation of relevant anti-corruption legislation can lead to severe civil and criminal penalties and reputational damage to Betsson Group.
  - 9.2. Any employee found to be in violation of this Policy may be subject to disciplinary action, up to and including termination of employment, in accordance with applicable law and Betsson's policies.
  - 9.3. Distributors, suppliers, agents, consultants, or other contract workers and third parties working for Betsson Group who are found to be in violation of this Policy may be subject to termination of the business relationship as well as any other legal and remedial actions available.
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