

ESG Policy

For Betsson Group

COMM-002

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

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Version log

Revisions

Version	Date	Author	Description of changes
1.0	2022-01-28	Head of Sustainability	Initial version.
1.1	2023-09-11	Head of Sustainability	Clarification on the SDGs, addition that Betsson is an official participant in the U.N Global Compact initiative, updated wording under the 'Social impact' section, clarification on reporting to the Board and Audit Committee and more generic reference to external reporting requirements.
1.2	2024-10-01	Head of ESG	Updated wording to further equate 'sustainability' with 'ESG'. Reporting cycle for Sustainability Forum updated. Clarification on inclusion of upstream value chain in ESG/sustainability efforts. Added mention of the already existing climate roadmap in Climate Impact focus area description.
1.3	2025-09-30	Head of ESG	Changed name of policy from 'Sustainability Policy' to 'ESG Policy' to clarify scope across environment, social and governance matters. Added reference to ISO certifications. Clarified responsibility of the Board and the Audit committee in view of CSRD.

Revisions approved by the Board of Directors

Version	Date of Policy	Date Approved
1.0	2022-01-28	2022-02-09
1.1	2023-09-11	2023-11-13
1.2	2024-10-01	2024-11-19
1.3	2025-09-30	2025-11-20

1. Purpose and background

- 1.1. Sustainability can be understood as the balance between the environment, social equity, and economy and how they are all connected. In 1987, the United Nations Brundtland Commission in its report *Our Common Future* defined sustainability as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.”
- 1.2. It follows therefore, that corporate sustainability is about creating long-term value by implementing strategies that incorporate environmental, social and governance, or ESG, dimensions, in addition to economic value.
- 1.3. The purpose of this ESG policy (the “Policy”) is to lay down the principles for Betsson Group’s sustainability work. The goal is to have clear governance and ways of working, which ensures continuity and a long-term approach to environmental, social and governance factors in Betsson Group.
- 1.4. The policy is applicable to both Betsson AB and to Betsson Operations, i.e. to all of Betsson Group.
- 1.5. This Policy is derived from the Rules of Procedure for the Board of Directors in Betsson AB (publ) (“Betsson AB”).

2. Overall definition and program statement

2.1 Overall definition: Sustainability

- 2.1.1. *Sustainability at Betsson is defined as a long-term approach to include environmental, social and governance factors as a central part of the business strategy and the company culture, with the aim to create shareholder value, increase competitiveness, and secure the integrity of Betsson AB as a listed company over time.*

2.2 Program statement: A responsible business

- 2.2.1. A strategic approach to sustainability and responsible business is a prerequisite to stay relevant in regulated and highly dynamic markets. Also, it is crucial for maintaining trust among investors, employees, partners, and customers.
- 2.2.2. Responsible business is about meeting legal requirements and running a sound business, work for long-lasting customer and supplier relationships and strive to be the best place to work and do better for the environment and society.
- 2.2.3. By taking responsibility, Betsson makes sure to operate in a sustainable way that creates value for customers, employees, partners, and society while generating competitive financial returns for Betsson’s shareholders.

2.2.4. To focus the efforts, Betsson has developed a strategic sustainability framework.

3. The Sustainability Framework

3.1. Betsson’s sustainability framework covers environmental, social and governance aspects and is based on five focus areas: Responsible Gaming, Business Compliance, Employee Impact, Social Impact and Climate Impact. Each area within this framework includes defined ambitions, goals and KPIs. For each ambition, a responsible person in either Operational or AB Management is appointed as accountable for the specific goals, KPIs and related actions.



3.2. The overall framework shall be adopted by the Board of Directors of Betsson AB. The specifics of the framework, i.e., ambitions, goals and KPIs, shall be approved by the Sustainability Forum and reviewed on a yearly basis.

3.3. The sustainability framework shall be managed, overseen, and developed by the VP Communications & Investor Relations, Betsson AB.

3.4. Betsson’s efforts within the Sustainability Framework are mapped against the U.N. Sustainability Goals (SDGs), where Betsson has defined that its biggest impact is on the following SDGs: Goal 3 Good Health and Wellbeing, Goal 5 Gender Equality, Goal 8 Decent Work and Economic Growth, Goal 13 Climate Action and Goal 16 Peace, Justice and Strong Institutions.

- 3.5. Betsson is an official participant in the U.N Global Compact initiative and therefore has pledged to align the Group's strategies and operations with the ten principles on human rights, labor, environment, and anti-corruption, and to take action to advance societal goals such as the SDGs.
- 3.6. Betsson's Italian operations, the entity Azzuri Ltd, has the following ISO certifications and independent assessments:
- ISO 14001 Environment Management
 - ISO 50001 Energy Management
 - ISO 26000 Social responsibility
 - ISO 30415 Human resource management
 - ISO 9001 Quality management
- 3.7. The certifications reflect the Group-wide commitment to operating responsibly, ethically and sustainably. While the audit was conducted for the Italian operations, the values underpinning these standards – from quality and environmental care to diversity and social responsibility – are deeply embedded across Betsson Group.
- 3.8. The Group also holds an ISO 27001 Information Security Management System certification.

4. Focus areas within the framework

4.1 Responsible gaming

- 4.1.1. Responsible gaming is at the core of the sustainability framework. As a gaming company, Betsson has a responsibility to provide customers with the right conditions to enable them to control their gaming and have a healthy relationship to gaming. In addition, Betsson must identify and always help customers at risk of problem gambling.

4.2 Ethics and business compliance

- 4.2.1. Compliance with relevant laws, rules, and ethical standards in the jurisdictions in which Betsson operates is the foundation of a sustainable business model. Betsson also works to ensure that gaming legislation is sustainable in the long term, which means that legislation must ensure a high degree of channelisation as well as player protection, while also considering individual player preferences.

4.3 Employee impact

- 4.3.1. Betsson's ambition is to be the Employer of Choice – the first choice for both current and potential employees. Attracting talent with the right skills, retaining, and developing employees is an important part of Betsson's winning concept.

4.4 Social impact

- 4.4.1. Betsson should have a positive impact on societies where the Group operates. Betsson focuses its social impact efforts on three main areas: sports, diversity, and environment, but also adapts to world events and directs its support where it is most needed.

4.5 Climate impact

- 4.5.1 Betsson will contribute to counteracting climate change and will reduce its greenhouse gas emissions in accordance with the science-based targets set out in the climate roadmap. Betsson climate compensates for its current greenhouse gas emissions, including those generated by customers playing games offered by Betsson.

5. Governance of sustainability at Betsson

5.1 The Board of Directors in Betsson AB

- 5.1.1. The Board of Directors is responsible for identifying how sustainability and ESG factors affect risks and business opportunities for the Group. The Board's oversight of ESG matters is further formalised through the Board's signature of the sustainability statement, ensuring its accuracy and completeness, in accordance with the EU Corporate Sustainability Reporting Directive.
- 5.1.2. The Audit Committee shoulders the responsibility for sustainability matters on behalf of the Board. It is responsible for monitoring the Group's sustainability reporting and related internal control and processes, as well as internal and external audits.
- 5.1.3. To ensure that the Board is kept up to date in this regard, VP Communications and Investor Relations, or a person designated by him or her, shall provide the Board with a yearly update. Further, VP Communications and Investor Relations, or a person designated by him or her, shall keep the Audit Committee updated within the ESG area with reasonable intervals throughout the year.

5.2 The Sustainability Forum

- 5.2.1. The Forum shall have a responsibility, on behalf of the respective management teams, to ensure that the sustainability framework is kept up to date, complied with and delivered on through-out the Group. This includes a responsibility to follow-up on the set long-term goals and KPIs within the framework.
- 5.2.2. The Sustainability Forum shall consist of the CEO and president of Betsson Group and the operational CEO and elected senior executives from the management teams in Betsson AB and Betsson Operations.
- 5.2.3. The Forum shall meet twice per year. The meetings shall be chaired by the VP Communications & Investor Relations, Betsson AB, or a person designated by him or her. The respective CEOs for Betsson AB and Betsson Operations shall participate in at least one meeting per year.

5.3 The Sustainability Working Group

- 5.3.1. The Sustainability Working Group shall be responsible for driving, coordinating, and developing the work around the sustainability framework, as well as continuously keeping track of and evaluating ESG KPIs and activities. The Working Group's members are appointed by the Sustainability Forum and shall represent relevant parts of the operational organisation and may in turn engage other internal resources within their area.
- 5.3.2. More in detail, the Working Group members shall administrate the follow-up and reporting on KPIs and activities to the Sustainability Forum and in connection with the annual sustainability report as well as, where relevant, with interim reports. The Working Group shall be led by the Head of ESG, who holds individual Sustainability Working Group member meetings as needed.

6. Follow-up and reporting on KPIs

- 6.1. Betsson shall use a suitable monitoring and reporting tool, provided by an external service provider, to objectively follow up and report on ESG related KPIs and to ensure a high degree of transparency and traceability.
- 6.2. The individual measurement items to be reported on are linked to the areas in the Sustainability framework and in line with EU requirements and international standards such as, but not limited to, the EU Corporate Sustainability Reporting Directive (CSRD). Climate related measurement points correspond to emissions within Scope 1, 2 or 3.
- 6.3. Designated employees within the Group shall be responsible to provide relevant data and submit such data into the reporting tool.
- 6.4. The Head of ESG has the overall responsibility for the management of the reporting tool, or any such equivalent tool used from time to time. He or she shall make certain that there are adequate procedures and routines in place to ensure that reliable information is reported.
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