

Human Rights Policy

Global

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1. Purpose

At Betsson Group, we are committed to respecting, promoting, and upholding the human rights of all individuals impacted by our operations and supply chains. As a global gaming and entertainment provider, we recognise our responsibility not only to provide safe and enjoyable services but also to operate ethically and with integrity.

This policy is guided by:

- The **UN Guiding Principles on Business and Human Rights (UNGPs)**
- The **OECD Guidelines for Multinational Enterprises**
- The **EU Charter of Fundamental Rights**
- The **ILO Core Labour Conventions**
- The **European Convention on Human Rights**
- The **General Data Protection Regulation (GDPR)**
- The **Corporate Sustainability Due Diligence Directive (CSDDD)**

We are also proud participants in the **United Nations Global Compact**, aligning with its Ten Principles, including those on human rights and labour.

2. Scope

This policy applies to all Betsson Group employees, contractors, consultants, and business partners.

While local laws may vary, we aim to uphold these principles consistently across our operations.

3. Our Human Rights Commitments

We are committed to:

a) Dignity, Equality and Non-Discrimination

- We treat all individuals with fairness, dignity, and respect - regardless of gender, ethnicity, age, disability, sexual orientation, religion, or any protected characteristic.

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- We are committed to creating a diverse, equitable, and inclusive workplace and online environment.
- Discrimination, harassment, bullying, and victimisation are strictly prohibited.

b) Safe and Inclusive Work Environment

- We provide a safe and healthy working environment for all employees and contractors.
- We embed psychological safety, accessibility, and flexible working where possible.

c) Freedom of Association and Collective Bargaining

- We recognise the right of employees to freedom of association and collective bargaining in accordance with applicable laws.
- While Betsson does not formally recognise employee representatives unless legally required, we do not interfere with or deny the right of individuals to seek representation where permitted.

d) Prevention of Modern Slavery and Child Labour

- We do not tolerate forced labour, bonded labour, or human trafficking in any part of our business or supply chain.
- We do not employ anyone under the age of 18.
- We address these risks through:
 - Our Code of Conduct
 - Our Whistleblowing Policy, providing anonymous reporting channels

e) Fair Employment Practices

- We provide fair pay, benefits, and working conditions in accordance with applicable labour laws.
- We ensure transparency in hiring, promotion, and termination processes.

f) Responsible Supply Chains

- We work with suppliers and partners who demonstrate ethical labour practices and transparency.
- We expect all suppliers to operate in accordance with our standards and applicable laws.

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- Betsson's Supplier Code of Conduct states that suppliers shall respect internationally recognised human rights and undertake not to cause, participate in, or through their business activities be linked to a negative impact on human rights.
- We include human rights clauses in contracts and assess supplier risk where relevant.

g) Privacy and Digital Rights

- We respect and protect the personal data and digital rights of our employees and players.
- We comply with GDPR and any applicable data protection laws across our markets.

h) Community and Social Impact

- We consider both the impact of our operations on human rights and communities (outside-in) and how human rights risks may in turn affect our business (inside-out), particularly in the markets where we operate.
- We engage with stakeholders, including employees, NGOs, suppliers and regulators, to understand, assess and address human rights concerns.
- We support local communities through responsible operations, local employment, and social engagement.

4. Implementation

- Responsibility for human rights lies with the Chief Human Resources Officer, in collaboration with the Head of ESG. Oversight is provided by the Board of Directors, ensuring that human rights considerations are integrated into strategic decisions and group-level risk management.
- We integrate respect for human rights through our core people practices, governance policies, and compliance processes.
- These include our Code of Conduct, Whistleblowing Policy, and Anti-Corruption Policy.
- Relevant legal requirements guide our approach, and we will continue to strengthen our human rights practices over time as part of our broader sustainability journey.

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5. Reporting and Grievance Mechanisms

We maintain accessible, confidential, and non-retaliatory reporting channels for employees and stakeholders (for example, suppliers) to raise concerns related to human rights. These include:

- Our anonymous whistleblowing platform is available for employees and external stakeholders.
- Reports made to designated officers (HR, Legal, Compliance)

All concerns are investigated promptly, with corrective actions taken where required.

6. Monitoring and Review

- This policy is reviewed annually or in line with regulatory changes.
- We monitor implementation through internal controls, ESG reporting, the enterprise risk assessment, and stakeholder feedback.
- Progress is communicated via our annual Sustainability Report and aligned with international reporting standards, i.e. CSRD.

7. Accessibility

This policy is available to all employees via the company intranet and to external stakeholders via the [Betsson AB website](#). It is intended as a public commitment to respecting and promoting human rights across our operations, supply chain, and business relationships.

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